Appendix B – EAW Comments and Responses

The Environmental Assessment Worksheet (EAW) for the East Side Corridor (29th Ave Corridor) Project was distributed on November 18, 2025, to agencies and organizations on the official distribution list, as well as additional agencies/organizations that could be affected by the proposed Project. The Owatonna People's Press published a press release on November 17, 2025, and a legal notice was also published on November 18, 2025. The comment period for the EAW officially closed at the end of the business day on December 31, 2025. Reviewers were invited to submit comments via the Project website form or by mail to the Steele county Public Works Facility, 3000 Hoffman Dr NW, Owatonna, MN 55060.

During the public review and comment period, Steele County received comments on the EAW from a total of three (3) agencies, sixty-seven (67) individuals from the public, and one (1) neighborhood group.

Consistent with state environmental rules, substantive comments received are responded to in this appendix, as part of the Findings of Fact and Conclusions for the Project record. Specifically, responses have been prepared for substantive statements pertaining to analysis conducted for and documented in the EAW, including: incorrect, incomplete or unclear information; permit requirements; content requirements. These comments and responses are included in the following pages. Written comments agreeing with the EAW Project information, general opinions, statements of fact, or statements of preference were not formally responded to but are also included.

Comments and Responses to Those Comments

This section contains the comments and written responses to all comments received from the following agencies/organizations, individuals, and neighborhood group during the public comment period:

Agencies/Organizations:

- City of Owatonna (*Comment #80*)
- Minnesota Department of Transportation (*Comment #248 & #249*)
- Minnesota Department of Natural Resources (*Comment #55*)

Individuals and Neighborhood Group:

- The attached table (Pages B: 1 of 82 – 82 of 82) includes all comments from individuals/neighborhood group and responses to them.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
1	11/18/2025	Patricia Braasch-Turi	Burpingeagle@gmail.com	482 Morning Dr	I don't understand the need when you have 34th already available. Improve or change access to it for the North	As indicated in the purpose and need in the EAW Section 6, there are limited continuous north-south routes linking the northern and southern portions of the city and the east-west routes within the community. Residents are required to use multiple roadways to make north-south trips and use neighborhood roads which are not designed to carry through traffic due to the number of driveways and conflict points. 29th Ave provides that connection where development exists nearby and is expected to be in the future. In addition to using disjointed/disconnected routes, some traffic uses routes into the downtown that have a more direct route. This puts pressure on the limited north-south routes contributing to problems today and in the future. The county's transportation indicates that a few routes will be congested (Mineral Springs and North Street) and several others will be approaching congestion at a volume to capacity ratio over 0.92 or higher. In addition, the city continues to grow and develop. This development is on the eastern side of the community as reflected in the city's comprehensive plan and in its annexation agreement with the neighboring township. The project will help support this growth. As noted in the EAW, the project also provides a good connection for those living in the northeastern portion of the community to the relocated high school. MnDOT's Access Management Manual (effective January 2, 2008) recommends spacing of 1 to 3 miles between roadways. The proposed East Side Corridor/29th Ave Corridor would provide approximately 2.2 miles of spacing from Cedar Avenue, consistent with recommended spacing guidelines. 34th is approximately 3 miles to the east, but would not serve existing development and traffic as well. Preparation of an EAW does not require an alternatives analysis under MEPA. The alignment at 29th addresses the documented transportation needs.
2	11/18/2025	Monte Mowry	mowryslazymeadows@gmail.com	2549 SE 34th Ave	To bring traffic out of NE Owatonna there are already several existing streets that can bring traffic to Rose street. Crestview Lane, Country View Ave, and Greenhaven Lane, Off of Rose Street is Partridge Ave that appears to have been design from the past as a designated road bed but has never been developed all the way through to School Street, I used to live on East School St and know the area well. Traffic could then be routed on to Old Main "Claremont Ave" to Bixby road or extend Partridge to cross tracks and connect to or cross Havana Road, and then connect to 18th east of OHS. This would have less impact on the ag land that the proposed 29th St project has. This project should see major funding from Owatonna City Streets Dept and the Steele County as a secondary contributor. If it is believe that this is actually is a "county traffic improvement" than it should be on the old cartway/roadway which lines up with 34th Ave on both ends as it was suggest to be many years back.	As indicated in the purpose and need in the EAW Section 6, there are limited continuous north-south routes linking the city and east-west within the community. The routes mentioned in the comment are not continuous north south, with several of the routes being local/neighborhood roadways with closely spaced driveways (part of the problem identified). Some of the routes cannot be extended further north or south due to the golf course or being required to connect to additional local neighborhood roads which were not designed to accommodate more through traffic. See response to Comment 1 regarding 34th.
3	11/19/2025	Robert Grant	7589co13@gmail.com	7589 CR 13	I own the land where the road plans on running. I have asked for risk assessment on the bridge and road haven't been given any information about going through the flood zone I feel that it will flood my sons house if the road is built on the west side of his house. I need the risk assessment so I can retain a hydrologic engineer to give independent look at the county work on this project	A floodplain analysis was completed and is included in Attachment D of the EAW. No floodplain impacts are expected. Section 12 of the EAW provides a summary of the analysis and next steps that will be coordinated with the DNR as design continues to progress.
4	11/21/2025	Shelley Thom	shelleymaethom@yahoo.com	625 14th St NE	I'm against this proposal. I use Kenyon road, Havana Rd and Claremont road every day for driving back and forth to work. I have zero clue what the alternative route would be. I have had zero issues driving this route and with the 4 way stop in Havana now the traffic has cooperated and it is working. As a taxpayer I think this project needs to be on hold. Every single person is struggling with the economy and we are strapped to the max. The tax increase and cost of healthcare has put every body backwards. People are going to be leaving Steele County for other counties that are cheaper and don't have millions of dollars of tax dollars planned for the future. Steele county citizens should absolutely have a vote in the projects that are planned. The amount of land taken also from home ownership is unfair because this is a want not a necessity. Please do not move forward with this project. Thank you	Comment noted. Section 6 of the EAW identifies and describes the purpose and need for the project. Property needed for the project will go through a formal right of way acquisition process and will include appraisals and compensation for land acquired.
5	11/21/2025	Roger Knutson	NA	2235 Majestic Ln	Use the current black top road that's already there. That would be a lot cheaper and would make a lot of people more comfortable with it	Please see response to Comment 1. The closest continuous north-south roadway to the project that is paved is CSAH 43 (SE/NE 44th Ave). That route is over a mile and a half away and would be further away from existing and proposed development and would not address the purpose and need for the project.
6	11/22/2025	Eydie Hauer	eydiemarie62@gmail.com	2927 Rose St	Everything looks good. Moving the new road farther away from town would be a complete waste and wouldn't solve the problems that currently being delt with. The bullies very upset about the east corridor chose to purchase land with a road planned. They can move.	Comment noted.
7	11/23/2025	Matt Pichner	Mpichner193@gmail.com	2183 SE 24th Ave	Curious why there will be curb and gutter on a road that runs thru mainly fields. Seems like a very unnecessary expense to add storm sewer to a project like this. Also a trail? Too many taxes in this county already. The argument was for residents from the north side of town to get to the high school. No one will be walking to school so ditch the trail and curb and save the population millions , and then there is no need for the ponds	**Curb and Gutter** Curb and gutter will be provided on a portion of the proposed route near existing neighborhoods as noted in the project description in the EAW. That will narrow the roadway footprint and keep speeds lower. Other portions of the corridor will be rural (ditches - no curb and gutter) or suburban (one side curb and gutter and one side ditch) to minimize costs. **Trail** Much of the proposed trail is consistent with existing city plans as noted in the EAW. Walking and biking were also noted as a secondary need. Providing a non-motorized option is a safety benefit for those walking and biking. **Ponding** Ponding will be needed to address additional impervious surface for more than just the trail.
8	11/28/2025	Leon Dibble	leondneln@gmail.com	1542 Hemlock Ave	Too expensive. Hwy 14 into I-35 gives the best bypass one could get. I believe there to be problems on the West side. I will attend the public meeting	Comments noted. The project is not intended to provide a bypass of the city as indicated in the purpose and need of the EAW.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
9	12/5/2025	Michael O'Neill	mjoneill@charter.net	NA	As a long term resident, I understand your concern about the proposed route. Has anyone asked about straightening out the curved route closest to the 17 homes? If moved to 34th, will you object business's that could be built in your backyard, like a Kwik Trip or fast food, offices etc. My opinion you are looking out just for the 17 homes being effected and not what's good for the community long term. Over 30 years, a group just like yours extremely opposed the expansion of Bridge street. They wanted to block expansion of Bridge St to what you see today, industrial park businesses, commercial businesses and access to US 35. The expansion was for the good of the community! Think community needs. Mike O'Neill	Comment noted.
10	12/11/2025	Sandra Michels	Sandramichels50@gmail.com	5410 Timberwood Lane NE	Why does Owatonna need a road going around the city at this time when Faribault with a population close to Owatonna doesn't have one? How will this road be funded?	The proposed project is not a part of a ring road. As noted in the response to Comment 1, there is a lack of continuous north-south roadways to serve the community. As a result people are using neighborhood streets, going downtown, or using multiple routes to make a north south connection. The proposed project provides that continuous north-south connection to link the northern and southern portions of the community. The project will be paid for by the county and the city. Both agencies have identified funding for the project. The county will not be assessing residents for the improvements.
11	12/11/2025	Dennis Luebbe	luebbe28@gmail.com	307 1st St SW	This project is essential for the long term economic growth of the city and county.	Comment noted.
12	12/12/2025	Michael O'Neill	mjoneill@charter.net		I strongly agree with the current plan. It provides a true north/south corridor, not available today. A lot of consideration is in the for American with Disabilities Act (ADA) elements, intersection control, and storm water treatment. The plan also addresses the 17 homes directly affected and has options to mitigate noise/safety concerns with berms, trees and fencing. This plan provides for future growth that is good for the majority of the population.	Comment noted.
13	12/11/2025	Sharon Brown	NA	571 Riverwood Dr SW	Thanks for adding the paved trail and connecting it to the trail network. Glad to see an East Side connector street from North to South	Comment noted.
14	12/11/2025	Leon Dibble	leondneln@gmail.com	1542 Hemlock Ave	We do not need it On the west side lakeside wastewater is affected Bad for the company	Please see the response to Comment 1 regarding the need for the project. Other comments noted.
15	12/11/2025	Nicholas Elgner	NA	3645 Saint Paul Rd, Owatonna, MN	Can't wait for the project to wrap up. Selected route is the best option and was planned for years. Needed route. Don't move further east, this route is the best option Good job on planning this route over the years.	Comment noted.
16	12/11/2025	Angie Jarrett	NA	1275 Ridge Rd	This is going to be incredibly efficient and so much safer than driving through neighborhoods. Excellent idea and advancement Looks like it would reduce traffic on Havanna too.	Comment noted.
17	12/11/2025	Kris Busse	Krismbusse@gmail.com	1653 Wedgewood Dr	I am in strong support of constructing the East side corridor on the proposed alignment. It is long overdue! It will greatly benefit the city, less congestion downtown, east of getting around town. Please proceed!	Comment noted.
18	12/11/2025	Paul Flay	pflay@live.com	2345 Liinhaven Pl NE, Owatonna	I love having a trail put in next to the road. It seems like a berm would be the best buffer for the road & close by houses with trees or shrubs on the berm. It seems like a huge long term win for Owatonna. Can the road be moved to the east even 30 feet where the houses are close to the road? I like the roundabouts to help slow traffic. Will the railroad crossing create traffic issues when trains run? Thanks for hosting tonight's session. Well done. The speed limit needs to be kept low to avoid noise & accidents. Thank you.	**Trail** Comment noted. **Berm/Trees** Comment noted. **Road Shift** Moving the roadway 30 feet to the east will create unusable land that would have be owned and maintained by the county and would require additional roadway extensions at Timberwood Ln. It would also impact existing underground utilities and their connections. **Roundabout** Comment noted. **Railroad Crossing** The new railroad crossing will be better than current crossings. The cross street (Claremont Rd) will be moved further from the railway tracks to provide better separation with the railroad and allow for gates and flashers to be installed. Traffic volumes are not anticipated to create significant traffic problems when trains pass through. **Speed Limit** The design speed of the roadway is 40 mph. 40 miles per hour is considered a low-speed roadway.
19	12/11/2025	Rick Sommers	NA	2352 Haddonstone Ln NE	I would hope for the better of the Environment you are able to keep mature Pine trees along the north Border of my property - These trees were planted many years ago with the intent of this project would become a reality Sincerely Rick Sommers	Specific impacts to trees and other features will be further analyzed in final design and during the right of way negotiation process, as applicable.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
20	12/11/2025	Kari Wiste	Kwiste13@gmail.com	2545 Mossy Creek Dr	The road is too close to homes. Bottom line, move the road out further away from our Owatonna families, citizens, + residents. We are concerned for the safety of our family, kids, and elderly in our neighborhood. The noise will affect mental health with sleep disturbances. Concerns - safety and well being, noise due to proximity of bedroom windows, not enough money to pay for this...taxes already going up w/ police + fire projects. Mitigations - if having to choose, we want all options...fence, berm, and trees (all). The fence offered is NOT high enough + will not be a big enough sound barrier being that close to houses. A noise wall is needed, not a little wooden fence. We wont even be able to have our windows open due to pollution + noise. We want a "Full Environmental Statement."	**Safety** The proposed roadway took safety into consideration. The design speed of the roadway is 40 miles per hour, which is considered a low-speed roadway; roundabouts were included at key intersections to help keep speeds slower and to provide safer crossings for all users; an urban design was used near neighborhoods to decrease the roadway footprint and to help slow speeds near developed areas; and a trail was included in the project to provide a safe location for non-motorized users. The trail also helps to add a buffer between residential areas and the roadway. **Noise** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. **Funding** Funding has been identified by both the county and the city to construct the roadway. **Environmental Statement** The county board will determine if an environmental impact statement is needed under MEPA.
21	12/11/2025	Becky Boll	BeckyKay04@yahoo.com	660 Countryview Ave, Owatonna	Our family moved into this neighborhood in April 2022 and we live along Countryview Avenue, the current only in-out road to our development. The high rate of traffic and speeds along our road definitely necessitate an additional north-south road and connection to northern sides of Owatonna, however the current preferred proposed is far too close to our development and it does not need to be located there. The proposal to place the road at 34th Avenue needs to be seriously studied, as this is further out and does not impact our neighbors + friends' homes and safety. Please conduct a full Environmental Impact Statement. The lack of consideration of alternate road placements by the council is irresponsible and affects many young families, including my own. My daughters are 2 and almost 5 years old and we want to see safety and noise impact considerations for us and our neighborhood. I do not agree with the current proposed for the ESC placement. Please take the time to listen to your residents and constituents and consider other options. The impact in property value reduction to our neighbors and friends and additional noise and safety concerns are no worth placing the ESC in our neighbors' backyards. Thank you.	**Alternatives/34th** Please see the response to Comment 1 and 31. The county believes 29th has good spacing with existing development and can better serve existing traffic and demand. **Safety** Please see the response to Comment 20. **Noise** Noise was documented in Section 19 of the EAW. Please see the response to Comment 20. **EIS** The county board will determine whether an environmental impact statement is needed.
22	12/11/2025	Susan Mullenbach	dsmully@msn.com	2535 Mossy Creek	This Project needs to go to EIS! Where are the Noise, Pollution, Safety Impact Studies? Why is 29th the preferred route over 34th? WE NEED A NOISE WALL If the location is not moved, you cannot use our property to measure footage 97 ft is not the correct measurement - should be measured from our property line! Mitigation measures are adequate with a fence, berm or trees. They will not meet the Standard Noise Wall. Study + move the location to 34th Ave!!!	**EIS** The county board will determine whether an environmental impact statement is needed under MEPA requirements. **Noise/Pollution/Safety Studies** The EAW contains information on Noise (Section 19), Air Quality (Section 17) and Greenhouse Gas (Section 18). The design of the proposed roadway took safety into consideration. Please see the response to Comment 20. **Roadway Location** Please see the responses to Comments 1 and 31. The county believes 29th has good spacing with existing development and can better serve existing traffic and demand. **Distance from Homes** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway.
23	12/11/2025	Christopher Miller	NA	1557 Hemlock Ave	I support the general concept of this plan. As a resident in the Northern portion of Owatonna, I see the desperate, overdue need for a North-South corridor in the East portion of Owatonna. Traffic going to southern portions of our community has become dangerous with over use and over capacity. I appreciate any and all measures to protect Maple Creek and other environments affected by this project. Please consider the addition of native plants and/or pollinator friendly habitats in ditches and open spaces created by this project. I also sympathize with any community members affected by the increased noise and traffic and believe it is very important to include their feedback on mitigating any impacts from that. Thank you.	The county will consider pollinator seeding consistent with MnDOT standards. Other comments noted.
24	12/11/2025	NA	NA	NA	Build it!	Comment Noted.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
25	12/11/2025	Seth Muir	sethmuir12@gmail.com	2551 Mossy Creek Dr, Owatonna, MN 55060	Good morning, I have thought of more concerns regarding the proposed East Side Corridor at the 29th Avenue location in Owatonna and I am asking for a full Environmental Impact Statement (EIS). Putting a roadway with such high speeds so close to many existing homes (some possibly closer than 20 feet) is unprecedented and will seriously jeopardize the safety of the hundreds of children, elderly, all people and pets that live there. Air pollution and light pollution would be another environmental factor. If an East Side Corridor is necessary, then an alternative at the 34th Avenue location (where there is an existing County road bed some of which was plowed under (legally?) by a farmer) should be considered. I ask for the EIS; I ask for safety and common sense; I ask for justice. Please help,	**EIS** The county board will determine whether an environmental impact statement is needed. **High Speed Road/Location** Please see the response to Comments 20 and 22. **Safety** Please see the response to Comment 20. **Air Pollution** The EAW contains information on air quality and greenhouse gas emissions (Sections 17 and 18). **Light Pollution** Lighting will be installed at roundabouts and intersections and will be directed to the roadway. Lighting near residential properties will include back shields to block/reduce light from spilling into other areas. LED lighting will be used and will be set at a natural light color. These are standard construction practices. **Alternative/Location** Please see responses to Comment 1 and 31.
26	12/11/2025	Seth Muir	sethmuir12@gmail.com	2551 Mossy Creek Dr, Owatonna, MN 55060	I have one more reason a full Environmental Impact Statement must be completed for the proposed 29th Avenue East Side Corridor at the edge of Owatonna. There will be serious impacts to the physical and mental health of the numerous residents next to this fast roadway. The value of the properties will diminish while a developer (or developers) behind the scenes is scheming to make money for themself--this possible and likely fraudulent behavior needs to seriously be investigated. The proposed 29th Avenue location is short-sighted and will have seriously negative impacts on the people, the habitats, and the future development of Owatonna. I ask for a full Environmental Impact Statement for the health and future of Steele County residents. In fairness and honesty, thank you for your help,	**EIS** The county board will determine whether an environmental impact statement is needed under MEPA review. **Physical/Mental Health** The EAW studies air quality and greenhouse gas in Sections 17 and 18. Mental health studies are not required as a part of MEPA. **Property Values/Fraudulent Behavior** Property vales are not an environmental effect and are not required for an EAW. There are numerous factors impacting property values - including the overall state of the economy, interest rates, housing demand, adjacent development, supporting transportation network, quality of the school district/schools, and numerous other factors. We are unaware of what developments/developers are mentioned in the comments.
27	12/13/2025	Linda Elbert	thekey945@hotmail.com	NA	Good evening. My husband and I were not able to come to the open house. I hope it went well. Is the project still a go for 29th Ave. I sure hope so. We live on Havana Rd not too far where the road will be going. Do you have a start date for construction. We are very excited about it. Owatonna is growing. I know there are a handful of people that are putting up some objections. But for the greater good of Owatonna you must do what is good for the whole community not just a few. Thank you for reading this. Any reply would be appreciated. Merry Christmas.	**Project Location** Yes, the proposed project is on 29th Ave. **Construction Year** The EAW noted construction will begin in 2026. It was anticipated to begin late in 2026. However, based on some expected timing of right of way acquisition, it is now expected to begin in 2027. Please see the FOFC.
28	12/11/2025	Sandi Kurth	skurth07@msn.com	NA	As a taxpayer in this community I have been paying attention to this project. I question whether other options that wouldn't disrupt an established residential area have been properly evaluated. I also am not convinced to safety concerns and environmental impact concerns have not been thoroughly studied. And why was federal funding removed from this project? Federal laws are strict and are in place to protect citizens. How is this project going to be paid for now? And why the lack of transparency that caused the citizens to have to file a complaint with the State in order to get the data they are entitled to. There are so many reasons that this project appears to be totally mismanaged. I hope further research is done into this situation. Thank you for your time.	**Alternatives** Please see the response to Comment 1 and 31. **Study Detail** The EAW documents a wide range of environmental impacts that have been studied according to state requirements. Please refer to sections 7 - 21 of the EAW that define impacts associated with the project. The EAW took safety into consideration. Please see the response to Comment 20. **Federal Funding/Costs** Federal funding was removed from this project and put on the Main Street project for multiple reasons as noted in the county's request to MnDOT State Aid to have the funding transferred (letter dated March 27, 2025). Reasons included: timing of funding - the county was concerned that the environmental document would not be completed and even if it was, there was not enough time to complete final design and right of way acquisition. Additional concerns regarding meeting the deadline included coordination with the railroad and opposition to the project from a neighborhood group. Delays would put the federal funding at risk, and the county wanted to utilize the federal funding. Main Street already had federal funding included and would meet the fiscal 2026 deadline. Please also see Comments 248 and 249 regarding federal funding. The city and county have funding identified for constructing the identified improvements. **Data Requests** Information contained in the EAW and FOFC contains information needed to comply with MEPA requirements for an EAW.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
29	12/10/2025	Kari Wiste	kwiste13@gmail.com	2545 Mossy Creek Drive, Owatonna, MN 55060	We are emailing in regards to the East Side Corridor project. We continue to be very concerned about the lack of communication from the county and about the lack of transparency that the county has had with us residents that are going to be directly affected by this road. We are once again asking that this road be moved out to 34th Ave or to look at other options that will not directly and significantly affect the well being of so many people and families that live in these neighborhoods. We are extremely concerned for our family's health, safety, and well being that this road will have. The noise and vehicle pollution that will be just feet away from our family bedrooms and house windows will have a significant affect on us. We are extremely concerned about the incomplete studies that have been done on noise and noise mitigations, the safety impacts that the road will have being so close to houses and homes, and of course the air pollution that will come directly into our windows and home daily. Our well being is going to be affected by a road that is too close to residential living. We want more studies done. We want the county to listen to the citizens of Owatonna that this road directly affects. We want the county to look at the other alternatives, 34th Ave. We want a full Environmental Impact Statement. Thank you, Greg and Kari Wiste	**Transparency/Alternatives** Steele County presented information about alternatives under consideration and a summary of the review at public informational meetings and shared the information on the project's website about the alternatives and need for the project. Please see the response to Comment 1 regarding the need for the project and why 29th was selected. **Health/Safety/Wellbeing** The EAW documents a wide range of environmental impacts that have been studied - including noise and air quality. Please refer to responses to Comment 20 regarding noise. Sections 17 and 18 of the EAW contain information on air quality and greenhouse gas. Please see the response to Comment 20 regarding safety. **Alternatives** Please see response to Comment 1 and 31. **EIS** The county board will determine whether an environmental impact statement is needed under MEPA.
30	12/13/2025	Donald/Susan Mullenbach	dsmully@msn.com	NA	I am commenting on the stated Purpose and Need for the East Side Corridor. The County claims the project is needed to address a "4-mile gap" in north-south roads, citing best practices of 1-3 mile spacing. However, the County's own mapping shows that 34th Avenue already meets this standard, as it is approximately 3 miles from Cedar Avenue and 1 mile from 44th Avenue. Because the stated spacing objective is already met, the proposed route does not meet its stated Purpose and Need. A lower-impact option that protects existing neighborhoods and productive farmland should be fully evaluated before advancing a new roadway. Please include this comment in the EAW record. Respectfully submitted, Susan Mullenbach	**Purpose and Need/Alternatives** Please refer to the responses to Comment 1 and 31. The project will have farmland impacts which are noted in the EAW in Section 10 - Land Use. The county will work with property owners during final design and the right of way acquisition to minimize and mitigate for property impacts.
31	12/15/2025	Sherri Whalen	swhalen@charter.net	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The ESC project has been studied for three decades. In the past twenty years, Owatonna development extended further east. •Did the City of Owatonna approve and permit homes within the North Country subdivision to be built on 50 feet of the 29th Ave right of way map in 2004 forward? •Was 34th officially designated as option 1 and 44th as option 2 for the East Corridor on February 8, 2005? •Was 29th removed from the Steele County Transportation Plan (2005-2025)? •If 29th was removed as a viable option due to proximity to the North Country subdivision, why was it brought back when the 150' right of way no longer exists? And why was a current mapped right of way (34th or 44th) not studied? •If 34th was a viable option back in 2005 and 2011, what study data has now made 34th no longer an option? The impact of constructing the ESC on the proposed 29th route has not considered the most logical routes previously studied (specifically 34th), therefore a full Environmental Impact Statement (EIS) is requested. Thank you, Sherri Whalen - Owatonna East Side Corridor Resident	**Purpose and Need/Alternatives** Please refer to the response to Comment 1. There is a long history associated with transportation needs in the east side of Owatonna. The purpose and need for those routes is varied. Some are/were intended to serve as part of a beltline or beltway around the community and to provide connections to larger transportation facilities such as US 14 (arterial routes). Other routes are/were intended to serve a more local purpose (collector routes). The proposed alignment at 29th St serves the purpose and need of the project to provide connections between the northern and southern portions of the city. Please see Section 6 of the EAW which describes the need for the proposed project and how 29th Ave addresses this need. Under MEPA, an EAW does not require an alternatives analysis. **EIS** The county board will determine whether an EIS is needed.
32	12/15/2025	Sherri Whalen	swhalen@charter.net	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The proposed route on 29th Ave is creating a dangerous situation for young children and vulnerable adults who live in the North Country development. Those at greatest risk have back yards that will be adjacent to the mapped area for a new highway. •What is the recommended distance between an existing neighborhood and a new highway (there is ample space to the east)? •Why is resident safety and the risk of human death and serious injury due to proximity to a highway not addressed in the EAW? The evident risk of human death and serious injury is not addressed at all in the EAW for the proposed 29th route. Since human safety (for drivers, pedestrians, surrounding residents, etc.) should be a significant concern for any new highway project, a full Environmental Impact Statement (EIS) is requested. Thank you, Sherri Whalen - Owatonna East Side Corridor Resident	**Recommended Spacing of Roadway and Development** There are no established standards for proximity to roadways and developments. There are numerous examples of county highways within the city of Owatonna where homes abut a county highway - either with a front yard, a back yard or a side yard. Examples near the project include: 26th St NE, NE 24th Ave, Dane Rd, Rose St, and others. **Safety** While the EAW does not require a "safety analysis", the design of the proposed roadway took safety into consideration. Please see response to Comment 20 on how the county considered safety as part of its design. **EIS** The county board will determine whether an EIS is needed.
33	12/15/2025	Sherri Whalen	swhalen@charter.net	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. As often stated, the ESC has been studied for at least three decades. In the most recent twenty years, Owatonna development extended further east. With the abandonment of prior right of way considerations at 29th Ave, more recent studies rightly pushed out the roadway areas to be studied for a potential beltline or corridor. This is evident in the most recent 2011 study. •Why did the most recent research go all the way back to the 1990s (when the North Country development did not exist) and bypass the more recent 2011 studies and current neighborhoods? •With the most recent 2011 study (of 34th and 44th), and insufficient new studies, why was 29th chosen as a preferred route in 2022? The impact of constructing the ESC on the proposed 29th route was prematurely selected after previously being removed, therefore a full Environmental Impact Statement (EIS) is requested. Thank you, Sherri Whalen - Owatonna East Side Corridor Resident	**Purpose and Need/Alternatives** Please refer to the response to Comment 1 and Comment 31. **EIS** The county board will determine whether an EIS is needed under MEPA requirements.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
34	12/15/2025	Sherri Whalen	swhalen@charter.net	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The North Country neighborhood enjoys a peaceful area on the edge of town. Though a future low speed outlet road was communicated, a highway was not in the plan when residents chose to build their homes. •What impact studies have been completed for the loss of resident property value? •What quality of life (visual, noise, safety, etc.) impact studies have been completed? The current EAW does not include major impact to existing residents in the North Country neighborhood. Due to the incomplete impact information, a full Environmental Impact Statement (EIS) is requested. Thank you, Sherri Whalen - Owatonna East Side Corridor Resident	**Property Values** Please see response to Comment 26. **Quality of Life - Visual/Noise/Safety** Please refer to the EAW for information on visual studies and noise information. The EAW documents a wide range of environmental impacts that have been studied - including visual impacts (Section 16 and Attachment J) and noise (Section 19). Additional information on noise can be found in the response to Comment 20. Please see the response to Comment 20 regarding safety which describes the design items incorporated into the project to enhance safety. **EIS** The county board will determine whether an EIS is needed.
35	12/15/2025	Sherri Whalen	swhalen@charter.net	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The proposed 29th Ave highway is a new route planned with curves, through existing wetland and forest, and with several roundabouts. 34th Ave is an existing road (some of it plowed under in recent years, but existing nonetheless) that is straight. As fiscal responsibility is a tenant of the County Commissioners and their mission: •How much money has already been spent (since 2022) on the ESC project? •What is the current cost comparison for 29th versus 34th (initial cost to construct and ongoing maintenance)? It is reasonable and expected that the commissioners and public can compare these costs prior to making a very large financial investment. Assuming this would be included, a full Environmental Impact Statement (EIS) is requested. If not included, a full cost benefit analysis (CBA) between 29th and 34th is requested. Thank you, Sherri Whalen - Owatonna East Side Corridor Resident	**Alternatives** Please refer to the response to Comment 1 regarding the need for the project and selection of 29th Ave as the preferred location. **Costs/Benefit-Cost** Comment noted. An EAW does not require a benefit-cost analysis to be completed. **EIS** The county board will determine whether an EIS is needed under MEPA requirements.
36	12/11/2025	Eileen Piccolo	eileenpic@yahoo.com	NA	My name is Eileen Piccolo and I am the oldest daughter of Kenneth & Jenell Warner. My parents own and live at the farm at 2697 Kenyon Road, Owatonna (PID#12-036-3000). My parents have not been able to attend any of the East Side Corridor Open Houses due to their health and they do not own or use computers so they are very confused about the whole situation. Mailings have been sporadic and confusing. I live in VA so it is difficult to piece together the information and to relay it to them. The Warner Family Farm will be dramatically impacted by both the 26th Street NE extension AND the new East Side Corridor (29th Ave). The 26th Street extension will run along their southern property line, replacing the current gravel road. The East Side Corridor- 29th Avenue will cut across the north part of their property, slicing off a large chunk, making it unusable. From what I read, the new high-speed road will require wide, steeply graded ditches on either side where tractors will not be able to cross over it so they can reach the land to farm. My parent's farm has been in the family since 1939 when my grandparents, Edward & Mary Warner purchased it from Frank Fisher. For decades Ed & Mary farmed the land with their three children; Kenneth (my Dad), Shirley and Diane. When my parents married in 1971 they farmed the land and later when my grandparents passed away in 2005 and 2007, my parents inherited the farm land along with my aunts, Shirley & Diane. My Dad has since retired from farming (he is currently 84 years old) but my aunt Shirley's family continues to farm the land. Three generations of my family have worked and cared for the land. Approximately ten years ago they spent thousands re-tiling the land to improve drainage. If the 29th Ave corridor is made, it will slice through all of this tiling and alter how the whole area drains, creating possible flooding. I am not sure this was even considered when they chose this option over the existing 34th Ave option. The 34th Avenue option has always been the best option for our family as well as all of the families who would be impacted by building a whole new 29th Avenue. Driving in Owatonna is always such a relief after my day to day on I95 in the Washington DC area. I wish people could see what real congestion looks like. Its very short sighted to chose an option that saves maybe a couple minutes of travel time over one that preserves tranquil homes and productive farms which are the heart of Steele County.	**Farmland Impacts** The county will be working with individual property owners to discuss compensation for direct property impacts, including impacts to farmland and opportunities to maintain access to the property and reduce ditch slopes where feasible. These discussions will occur as part of final design and the right of way acquisition process. The county is happy to meet with you and your family to discuss impacts and potential mitigation. **Alternatives** Please see response to Comment 1 regarding the purpose and need and selection of 29th Ave.
37	12/13/2025	Donald/Susan Mullenbach	dsmully@msn.com	NA	My husband and I own property that abuts the proposed 19th Ave option. It is not surprising that we would be concerned about the impacts the highway would have on our quality of life. Based on the information presented, the East Side Corridor does not meet its stated Purpose & Need and key data is missing or incomplete. Significant noise, environmental, neighborhood, farmland, floodplain, and environmental justice impacts require further study. I respectfully request that the RGU require a full Environmental Impact Statement (EIS). Respectfully submitted, Susan Mullenbach	**Purpose and Need** Please refer to the response to Comment 1 regarding the purpose and need as well as Section 6 of the EAW which explains current transportation problems that exist on the eastern half of the city. The proposed alignment on 29th Ave addresses the identified needs. **Missing Data/Incomplete - Noise, Environmental, Neighborhood, Floodplain** The EAW addresses the topics identified. Please refer to Section 19 (Noise) and response to comment 20 regarding noise. Several sections of the EAW address "environmental" impacts such as Air Quality and Greenhouse Gas, Climate (Sections 17, 18, and 7). Section 10 addresses land use (neighborhood and farmland) and Section 12 and Attachment D address floodplain. For some of these topics additional mitigation may be required through the permitting process. The county will be working with regulatory agencies regarding refinements and mitigation to impacts as design is further advanced. This is typical of transportation projects. Please refer to Section 9 (Permits) and the FOFC for information regarding permits needed. **Environmental Justice** Environmental Justice analyses had been required under federal guidance for projects with federal funding for construction (which the project does not have), but have been eliminated due to Presidential Executive Orders signed in early 2025 by President Trump. **EIS** The county board will determine whether an EIS is needed under MEPA requirements.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
38	12/13/2025	Donald/Susan Mullenbach	dsmully@msn.com	NA	My husband and I live on property that will abut up-to the proposed 19 Ave corridor. We are very fearful about the noise impact on our lives. The traffic noise impacts of this project are not adequately addressed in the Environmental Assessment Worksheet (EAW). Noise impacts are predictable, distance-based, and permanent when roadways are placed close to homes, yet the EAW fails to meaningfully evaluate avoidance, separation distance, or long-term impacts to nearby residents. State noise standards demonstrate that acceptable noise levels are only reached at substantial distances from travel lanes, particularly for heavy vehicles and higher speeds. Proposing a roadway closer than those distances creates foreseeable impacts that cannot be undone without costly mitigation or relocation. Because these impacts are significant and not fully analyzed, the EAW does not provide sufficient information to support a Finding of No Significant Impact. A more comprehensive review is necessary. An Environmental Impact Statement (EIS) is warranted to properly evaluate noise impacts, avoidance alternatives, and long-term consequences to residential neighborhoods. Respectfully submitted, Susan Mullenbach	**Noise** Please refer to Section 19 of the EAW and the response to Comments 20 and 46. **EIS** The county board will determine whether an EIS is needed in accordance with MEPA requirements.
39	12/12/2025	Chelsie Hansen-Stratton	ckhansen55@gmail.com	2586 Stony Creek Dr, Owatonna	I am commenting on the stated Purpose and Need for the East Side Corridor. The County claims the project is needed to address a “4-mile gap” in north–south roads, citing best practices of 1–3 mile spacing. However, the County’s own mapping shows that 34th Avenue already meets this standard, as it is approximately 3 miles from Cedar Avenue and 1 mile from 44th Avenue. As the stated spacing objective is already met, the proposed route does not meet its stated Purpose and Need. A lower-impact option that protects existing neighborhoods and productive farmland should be fully evaluated before advancing a new roadway. Facilitating development does not establish transportation need, particularly where existing transportation problems are unsupported elsewhere in the record. The EAW’s identification of a future “destination” adjacent to the corridor raises concerns that the project is being structured to enable development rather than address documented transportation demand. The East Side Corridor does not meet north–south travel improvement. When travel times are calculated using standard distance-and-speed formulas, Alternative 3 (29th Ave) shows no meaningful improvement, while Alternatives 4 and 5 perform as well or better. Travel-time assumptions should be based on consistent, real-world calculations. The East Side Corridor does not meet the purpose of moving traffic from downtown. Recent traffic data shows volumes have decreased on nearly all roadways previously identified as congested. When congestion is already declining, building a new roadway to address it is not justified.	**Purpose and Need - 34th Ave** Please refer to the response to Comment 1 regarding the need for the project and how the 29th Ave alternative addresses the need. 29th Ave provides that connection where development exists nearby and is expected to be in the future. 34th Ave is further away and would not serve existing traffic/development. The roadway is not intended to facilitate future development - it is intended to address existing needs and support development in the area where the city is growing. Several developments are occurring in the northeastern portion of the city along 26th St NE. These developments include Majestic Oaks on the north and directly across from Majestic Oaks on the south side, and a development along 26th Street NE on the south side where Kenyon Rd connects. It also does support planned growth in the community as noted in the city's comprehensive plan and explained in the EAW. **Development/Future Destination** The future destination area included in the traffic information (Section 20 of the EAW and in Attachment K) is for planned development consistent with the city's comprehensive plan. The destination being referenced is a future school on property owned by the school district. Planned land uses were used to help project future traffic volumes for the roadway (29th Ave) which range between 2,500 and 3,500 in 2046 as noted in the EAW. Information on future traffic is required for the EAW. **Traffic in Downtown** Traffic volumes in the downtown have dropped slightly since the completion of the county's transportation plan. There are fluctuations in traffic volumes and they can vary slightly from year to year. People making trips from the northern portion of the city still must go through the downtown or through neighborhood streets to get to the southern portion of the city - with the need for the connectivity still remaining. As noted in the county's transportation plan, additional growth in the community will put more traffic on the routes in the future. In the future, traffic volumes on key downtown routes are expected to be over capacity or closely approaching capacity.
39					Additionally, the East Side Corridor project does not have data showing it will remove trucks from neighborhood roads. The County has confirmed there are no traffic counts, truck volume data, or modeling showing truck traffic is a documented problem on Shady Ave or Crestview Ln or that it would be reduced by the ESC. Occasional service vehicles are not through-truck traffic and would continue regardless of this project. All of the above reasons warrant further study and support a full Environmental Impact Statement. At the heart of this, when a project that saves minimal travel distance, does not meaningfully improve travel time, does not remove truck traffic, and relies on future development for justification, is the project needed at all? Please include this comment in the EAW record.	**Truck Traffic** A continuous north-south roadway and trail network would serve all motorized users - including trucks, cars, school buses - and non-motorized users, as it would be a better connection than driving through the downtown or through roadways that were not designed for through traffic. The county agrees that trucks destined for specific locations - may still use neighborhood roads if that is their destination. The traffic analysis included in Section 20 of the EAW and Attachment K. **EIS** The county board will determine whether an Environmental Impact Statement is needed.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
40	12/10/2025	Kat Hansen-Stratton	kathie.l.stratton@gmail.com	2586 Stony Creek Dr, Owatonna	I am commenting on the stated Purpose and Need for the East Side Corridor. The County claims the project is needed to address a “4-mile gap” in north–south roads, citing best practices of 1–3 mile spacing. However, the County’s own mapping shows that 34th Avenue already meets this standard, as it is approximately 3 miles from Cedar Avenue and 1 mile from 44th Avenue. As the stated spacing objective is already met, the proposed route does not meet its stated Purpose and Need. A lower-impact option that protects existing neighborhoods and productive farmland should be fully evaluated before advancing a new roadway. Facilitating development does not establish transportation need, particularly where existing transportation problems are unsupported elsewhere in the record. The EAW’s identification of a future “destination” adjacent to the corridor raises concerns that the project is being structured to enable development rather than address documented transportation demand. The East Side Corridor doesn’t not meet north–south travel improvement. When travel times are calculated using standard distance-and-speed formulas, Alternative 3 (29th Ave) shows no meaningful improvement, while Alternatives 4 and 5 perform as well or better. Travel-time assumptions should be based on consistent, real-world calculations. The East Side Corridor does not meet the purpose of moving traffic from downtown. Recent traffic data shows volumes have decreased on nearly all roadways previously identified as congested. When congestion is already declining, building a new roadway to address it is not justified. Additionally, the East Side Corridor project does not have data showing it will remove trucks from neighborhood roads. The County has confirmed there are no traffic counts, truck volume data, or modeling showing truck traffic is a documented problem on Shady Ave or Crestview Ln or that it would be reduced by the ESC. Occasional service vehicles are not through-truck traffic and would continue regardless of this project. All of the above reason warrant further study and supports a full Environmental Impact Statement. At the heart of this, when a project that saves minimal travel distance, does not meaningfully improve travel time, does not remove truck traffic, and relies on future development for justification, is the project needed at all? Please include this comment in the EAW record.	Please see response to Comment 39.
41	12/10/2025	Melissa Zimmerman	lyssalynn13@gmail.com	NA	I am submitting this email and the attached correspondence as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The attached correspondence documents ongoing failures to provide meaningful access to ESC-related public data during the EAW comment period, including missing datasets and unusable inspection systems. The attached email, sent to Steele County on December 9, 2025, documents continued failures to provide meaningful access to ESC-related public data, despite a compliance order in OAH Case No. CAH 22-0305-40882. These failures are on-going and occurring during the active EAW comment period and have directly interfered with the public’s ability to review project information and submit informed, substantive comments. By way of summary, the documented procedural defects include: •Failure to lawfully obtain and make available key ESC-related records, including noise study materials and Joint Transportation Committee (JTC) records necessary to evaluate impacts, alternatives, and decision-making history •Previously available datasets now missing and inaccessible, including email records that were accessible during earlier inspections and are no longer present •Materially incomplete and degraded datasets, including email records converted into unusable formats that strip attachments, metadata, and context •Reliance on non-standard, third-party viewing software and unstable inspection systems, which prevent coherent, chronological, and meaningful review of records	Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA.
41					Under MEPA and NEPA, public participation is intended to occur early and often, with access to the underlying data necessary to evaluate impacts and alternatives. Here, essential ESC-related public data was not meaningfully accessible prior to the release of the EAW, for 14 months, and remains inaccessible now, further restricting residents’ ability to participate meaningfully in the environmental review process. The lack of access to essential ESC-related public data represents an additional procedural barrier in a process where opportunities for timely and meaningful public participation have already been limited and denied. Because these access failures persist during the EAW comment period, they raise serious concerns regarding whether the current process satisfies the procedural requirements for informed public participation required under MEPA and NEPA. Accordingly, I respectfully request that: 1.This email and the attached December 9, 2025 correspondence be included in the official EAW record; and 2.The RGU consider whether proceeding with the EAW under these conditions is procedurally appropriate, including whether the comment period should be paused or extended until meaningful access to the underlying ESC-related public data has been restored. Please confirm receipt of this submission and its inclusion in the EAW comment record. Thank you for your time and consideration. Sincerely, Melissa Zimmerman - Owatonna East Side Corridor Residents	
42					No Comment Included in #42	
43					No Comment Included in #43	
44					No Comment Included in #44	

Comment	Date Received	Name	Email	Address	Comment	Comment Response
45	12/13/2025	Melissa Zimmerman	lyssalynn13@gmail.com	NA	I am submitting the attached EAW comment regarding the East Side Corridor / 29th Avenue project, focused specifically on noise impacts and procedural compliance under MEPA, NEPA, and FHWA regulations. This comment identifies fundamental deficiencies in the Environmental Assessment Worksheet, including the absence of required noise modeling, failure to disclose absolute and relative noise levels, mischaracterization of nonfunctional measures as mitigation, and failure to evaluate avoidance and minimization. These omissions prevent informed public review and preclude a lawful finding of no significant environmental impact. Additionally, it is important to note that on November 24, 2025, Administrative Law Judge Moseng issued a ruling finding that Steele County substantially violated the Minnesota Government Data Practices Act (MGDPA) by denying residents meaningful access to project-specific public data. The ruling imposed the maximum civil penalty, ordered full compliance, and awarded court costs. The ALJ specifically ruled that the County improperly responded to residents' requests for noise studies, confirming that these requests were valid and that responsive data exists. Despite this ruling, the County continues to deny access to this noise-related data. Following the ruling, the County made an attempt to provide data; however, the manner in which the data was provided has rendered it effectively unusable. Basic software necessary to inspect records was removed, data formats are inconsistent, and a substantial portion of previously accessible records (approximately 1,800+ records) is now missing. As a result, residents currently have no meaningful access to project-related public data, including emails and records intended for use during the EAW comment period. This lack of functional access directly impairs residents' ability to meaningfully participate in the environmental review process, contrary to MEPA and NEPA public participation requirements. This context is directly relevant to the noise analysis deficiencies identified in the attached comment, as the inability to review underlying data further undermines informed public review. Because the Project involves federal funding, federal approvals, and State Aid eligibility, and because the identified deficiencies implicate systemic compliance issues rather than a localized technical correction, this correspondence is being copied to relevant oversight agencies for awareness. This is not a request for immediate intervention, but rather notice that material issues affecting environmental disclosure and regulatory compliance have been formally raised during the EAW comment period.	**Data** Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA. **NEPA/FHWA** The project does not have federal funding for construction. Please refer to response to Comment 28 regarding federal funds and Comments 248 and 249 indicating it is not a federal undertaking. Full NEPA environmental documentation and processes are not required. This includes noise studies done under NEPA. Noise evaluation in the state and federal processes are different. The project complied with MEPA requirements for the EAW. Please see below. **MEPA** The project is exempt from state noise standards as the roadway is not fully access controlled and is owned by the county. Detailed noise modeling following federal requirements is not necessary under MEPA. Please see response to Comment 20 on noise. The county understands that a new roadway will change noise from what it is today and has identified some measures to help mitigate for the change in conditions. The county has sought input from the public on these measures, which include berming, landscaping and/or fencing. The county acknowledges theses measures will not reduce sound to the extent that a noise wall would, but it is not required to provide that type of mitigation. In addition, as part of the design, the county incorporated design treatments and elements to slow travel speeds which helps to reduce noise. The county has elected to use a 40 mile per hour design speed, has used urban design (curb and gutter) in more developed areas, has shifted the roadway to the east in the urban sections to push the roadway away from development, and has incorporated roundabouts at intersections. Avoidance and minimization are not a MEPA requirement.
45	12/13/2025	Melissa Zimmerman	lyssalynn13@gmail.com	NA	The attached comment is intended to ensure the administrative record accurately reflects these concerns and to preserve the integrity of the environmental review process as required by Minn. R. ch. 4410, 23 CFR 772, and applicable NEPA guidance. Please confirm receipt and inclusion of this email, the attached EAW comment, and the November 24, 2025 Administrative Law Judge ruling in the official EAW record. Sincerely, Melissa Zimmerman - Owatonna, MN - Directly impacted resident	**Ability to Meaningfully Participate** The EAW was prepared compliant with MEPA and included the documentation required. This information was provided as part of the EAW and attachments which were posted to the EQB, were available in hard copies, and were available on-line for review. As noted above, NEPA is not Applicable.
45A	12/13/2025	Melissa Zimmerman	lyssalynn13@gmail.com	NA		Please note - comments in the attached PDF did not completely align with email. This is providing supplemental responses associated with the pdf. **Legally Noncompliant Under MEPA, NEPA, FHWA Regulations, and Minnesota Rules Chapter 4410.** See above regarding MEPA and FHWA regulations. Note information from MnDOT is in regard to federal noise requirements and state noise requirements it is subject to. Under MEPA, the project is exempt from state noise standards, but does need to consider changes in the land use by existing development. The county did consider noise and made adjustments to the design of the roadway and at key intersections to lessen sound impacts. It also offered to provide berming, fencing and landscaping to help shield homes from the roadway, while that is not the same as a 20-foot wall, a wall is not required. The EAW did include information on existing sound levels. **High Speed and High Volume** The design speed of the road is 40 miles per hour, which is considered a low speed roadway under MnDOT State Aid categories. The proposed traffic volumes on the roadway are projected to be between 1,300 and 1,900 following construction. In the future, traffic volumes are anticipated to range between 2,500 and 3,500 (29th Ave). The capacity of a two lane roadway is approximately 10,000 in urban areas. For context, Rose Street, which is on the south side of the North Country neighborhood has existing traffic volumes of approximately 1,835 vehicles a day. Rose Street is a collector roadway. **Disproportionately High and Adverse Effects** This is a former federal requirement (NEPA analysis) for low income and minority populations (Environmental Justice populations) - not children, elderly people or those medically susceptible. President Donald Trump removed studying Environmental Justice populations from federal documents under Presidential Executive Orders.
45A						**Noise Considerations/Mitigation** Residents were asked to provide input on potential measures to help screen homes and provide mitigation. Their input has been considered. Fencing was identified as an option due to feedback from the public indicating they did not want to see a roadway. Other treatments offered (landscaping trees/shrubs and berming) would be on public right of way. **EIS Needed** Please see responses above. The county board will determine whether an EIS is needed.
45B	12/13/2025	Melissa Zimmerman	lyssalynn13@gmail.com	NA		**Minnesota Cour of Administrative Hearings** Document received. Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA.
46					No Comment Included in #46	

Comment	Date Received	Name	Email	Address	Comment	Comment Response
47					No Comment Included in #47	
48	12/13/2025	Melissa Zimmerman	lyssalynn13@gmail.com		I am providing an identical, signed copy of my previously submitted EAW comment titled “Withheld Noise Study / Incomplete Record.” This submission is intended solely to confirm authorship and does not modify the content of the comment. Please include this signed version in the official EAW record. Thank you, Melissa Zimmerman Owatonna, MN	**EAW Comment - Withheld Noise Study / Incomplete Record** Comment noted. The noise study was prepared when the project had federal funding and was required to conduct a federal noise analysis. Federal funding has been removed and the project is no longer a federal undertaking. See Comment 28 and responses to Comments 248 and 249. The federal study is not applicable to MEPA requirements. The project is exempt from state noise standards as the roadway is not fully access controlled and is owned by the county. Detailed noise modeling following federal requirements is not necessary under MEPA. Please see response to Comment 20 on noise. The county understands that a new roadway will change noise from what it is today and has identified some measures to help mitigate for the change in conditions for existing development. The county has sought input from the public on these measures, which include berming, landscaping and/or fencing. The county acknowledges theses measures will not reduce sound to the extent that a noise wall would, but it is not required to provide that type of mitigation. In addition, as part of the design, the county incorporated design treatments and elements to slow travel speeds which helps to reduce noise. The county has elected to use a 40 mile per hour design speed, has used urban design (curb and gutter) in more developed areas, has shifted the roadway to the east within the established right of way in the urban sections to push the roadway away from development, and has incorporated roundabouts at intersections. **Existence of a project Specific Noise Study Not Included in EAW Record** See response above. **Documented Noise Impacts to Residential Receptors** See response above.
48						**Noise Levels Exceeding or Approaching Regulatory Thresholds** See response above. **Mitigation Feasibility and Cost Effectiveness Was Analyzed and Recommended** See response above. **Failure to Disclose Invalidates the EAW.** See response above. Avoidance is not a MEPA requirement. **Procedural Implications** See response above.
49	12/11/2025	Marie Olinger	marie42401@gmail.com	1340 Clover Ln SE, Owatonna, MN 55060	Based on the information presented, the East Side Corridor does not meet its stated Purpose & Need and key data is missing or incomplete. Significant noise, environmental, neighborhood, farmland, floodplain, and environmental justice impacts require further study. I respectfully request that the RGU require a full Environmental Impact Statement (EIS). I've been profoundly disappointed with the counties choices on this topic in recent years. They seem unreasonable, obstructive, and secretive. It's shameful. Listen to your residents and respond to their well reasoned requests. It is your duty. What is an EIS? An Environmental Impact Statement (EIS) is a much deeper level of study than an EAW. It requires: ✓ full alternatives analysis ✓ thorough review of environmental, social, and safety impacts ✓ public hearings ✓ responses to all substantive concerns ✓ meaningful public participation It's used when a project may cause significant impact or when key information is incomplete or inconsistent.	**Purpose and Need** Please see response to Comment 1. **Environmental Impacts** Please see responses to Comments 20 (Noise); 37 (neighborhood and floodplain); 37 (Environmental Justice). Impacts to farmland are included in Section 10 (land use) in the EAW. The EAW identifies approximately 64 acres of farmland impact. The EAW was provided to the Minnesota Department of Agriculture for review. No comments were received. Neighborhood/Land Use impacts are discussed in the EAW, which indicates existing and planned land uses and compatibility with land uses. **EIS** The county board will determine whether an EIS is needed.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
49					Why an EIS is needed for the East Side Corridor Based on the County's own data and responses: Purpose & Need is not supported – All routes meet the County's stated 1–3 mile north–south spacing – No meaningful travel-time benefit shown for 29th Ave – Downtown traffic is decreasing, not increasing – No truck-traffic data exists for Shady, Crestview, or Countryview Key impacts have not been fully analyzed – Noise impacts near homes (as close as 17 ft from the road) – Cumulative impacts to the surrounding neighborhoods – Environmental justice impacts – Floodplain impacts – Farmland impacts (loss of productive agricultural land) – Air pollution – Light pollution – Safety for people, homes, schools, and the surrounding environment	**Why an EIS is Needed** **Purpose and Need:** The EAW is required to identify the purpose and need for the project and to describe the preferred alternative/project that is proposed. An EAW does not require an alternatives analysis. It is a disclosure document that identifies impacts of a project. The RGU determines if the impacts rise to the need to prepare an environmental impact statement. Section 6 of the EAW identifies an alternative that addresses the purpose and need for a project. 29th Ave addresses the need to provide north/south continuity, help to keep unnecessary trips out of the downtown, and to keep longer trips off of neighborhood streets which were not designed to accommodate through traffic. **Impacts not Analyzed:** Please refer to Comment 20 regarding safety and noise. Please refer to response to Comment 37 for Environmental Justice. Please refer to response to Comment 37 for floodplain. Please refer to response to Comment 49 regarding farmland. Please refer to Comment 20 regarding safety. **Cumulative Impacts:** Section 21 of the EAW identifies cumulative impacts that were considered and noted that future projects may have either permits that are reviewed and approved by regulating agencies and will have to meet their requirements or may trigger state or federal environmental review. Cumulative effects included review of farmland loss, soil disturbances, wetlands and floodplain, species, noise, and transportation. **Air Pollution:** Sections 17 (Air Quality) and 18 (greenhouse gas) of the EAW address information on air pollution. **Light Pollution:** MEPA does not require the study of light pollution. However, the project design includes lighting at the roundabouts. However, the design of the project incorporated elements to reduce light into the neighborhood. Please see response to Comment 25.
49					Alternatives were dismissed prematurely – 34th Ave and other routes meet Purpose & Need but were not evaluated equally – Assumptions were used instead of standard formulas and methods – Historical information and context appear to have been cherry-picked Federal nexus and segmentation concerns – $4M in federal funding was removed rather than used to address costly mitigations – Federal permits and approvals exist on this project – Federal funds were used to complete related studies – The ESC has been tied to other projects (including the 18th St roundabout) in ways that may trigger segmentation concerns and federal review When a project does not clearly meet its Purpose & Need, or when major impacts and alternatives are not fully analyzed, state and federal laws support requiring deeper study through a full EIS. What you can do Ask the RGU to require a full EIS in your public comment. Email comments to: ronald.gaines@steelecountymn.gov Deadline: December 31, 2025	**Alternatives** MEPA EAW documents are not required to compare alternatives. **Federal Nexus** Federal funding was removed from the project for several reasons. Please refer to response to Comment 28. Covid dollars do not trigger full NEPA review for a project. Federal environmental review is tied to federal funding for construction. **Segmentation** Segmentation is a federal review, not a state review under MEPA. MEPA does address connected actions. The proposed project is geographically near the 18th St roundabout (roundabout project is just west of the east side corridor). That project was built to address safety and mobility needs at the intersection of 18th St and Bixby Rd. The east side corridor was identified to address north/south connectivity within the community to serve existing travel demand between existing land uses within the city. Building the roundabout did not induce the need for the east side corridor and vice versa. Each project is justified on its own merit - one is not a prerequisite for the other. **EIS** The county board will determine whether there is a need for a full EIS under MEPA.
50	12/14/2025	Donald/Susan Mullenbach	dsmully@msn.com	NA	I am submitting this comment because the Environmental Assessment Worksheet (EAW) for the East Side Corridor fails to meet the basic requirements of transparency, completeness, and accuracy required under MEPA. First, this project is clearly being advanced without adequate oversight. Decisions that materially affect cost, scope, impacts, and regulatory thresholds appear to have been made outside of public view and without full disclosure. Environmental review is not meant to follow decisions that have already been made — it is meant to inform them. That has not occurred here. Second, the EAW relies on misrepresented and incomplete data. Key assumptions regarding traffic, impacts, and mitigation are contradicted by available records and prior studies, while other critical analyses are missing entirely. When residents have raised legitimate questions supported by data, the response has not been clarification — it has been revision, expansion, or omission. That is not a valid environmental process. Third, residents are being asked to accept less than what the law requires. This includes being told to choose insufficient mitigation for impacts they did not create, despite the existence of federal regulations that provide stronger protections when impacts are significant. That is not a choice — it is coercion through incomplete disclosure.	**Oversight** The EAW was prepared under the direction of county staff. Some staff members changed over time, but was always overseen by county staff. Every design decision is not required to be shared and put out for public comment. MEPA requires preparation of an EAW when projects reach certain thresholds. For transportation projects, it is for those that are over two miles in length. The county complied with this requirement. The county also provided information about the project at open house meetings and on the project website. An EAW is a disclosure document that indicates the impacts associated with a project. The RGU (Steele County in this case) then needs to make a decision if there is need for a preparation of an EIS. As noted on the EQB website: An EAW is intended to succinctly assess a project's potential for significant environmental effects. RGUs are responsible for completing the environmental assessment worksheet that has a standardized list of questions, as maintained by the EQB, to assess the environmental effects that may be associated with a proposed project. The project proposer works with the RGU to complete the worksheet. The RGU completes the review and uses the criteria in rule to decide if the project has the potential for significant environmental effects. If the project does, then the preparation of an Environmental Impact Statement is ordered. **Misrepresented and Incomplete Data** Information in the EAW contains complete information for following MEPA requirements. Additional information on some elements of the project have been included in the FOFC to provide additional clarification. **Accepting Less than Law Requires** The project does not include federal funding and is not subject to NEPA review, including NEPA noise processes. Please see responses to Comments 20 and 28.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
50					Fourth, essential documents are missing or have not been made accessible to the public, including but not limited to: • Area of Potential Effect (APE) maps • 3B and all analysis • Noise and impact studies relied upon or referenced • Farmland impact evaluations • Cumulative effects analysis •Clear and complete financial disclosures showing the true cost of the project and its expansions An environmental review cannot be considered valid when the public is asked to comment without access to the documents necessary to understand the project. Finally, the scope of this project has expanded well beyond what was originally presented, driving up costs and impacts and pushing it into federal-undertaking territory — yet the review remains constrained to an EAW. If a project is too large for the state to manage without federal involvement, it is too large for an EAW. Transparency is not expensive. Noncompliance is. For these reasons, I do not believe this EAW meets MEPA or NEPA standards. A full, independent Environmental Impact Statement (EIS) is required to properly evaluate impacts, disclose costs, restore public trust, and protect residents.	**Missing/Inaccessible Data** Several items contained in the list of data are required under federal NEPA documentation, but not under state MEPA documentation for an EAW. The project is not under NEPA review. The following are not required: Area of Potential Effect maps, alternatives analysis, federal noise studies and federal noise mitigation, detailed farmland impact analyses. Cumulative effects regarding state requirements were completed and included in Chapter 21 of the EAW. Farmland impacts are discussed in Section 10 under land use in accordance with MEPA EAW requirements. Project costs have been updated and shared with the public via capitol improvement programs and at information shared at public meetings and on the project website. **Scope** The project does not have federal funding. **EIS** The county board will determine whether an EIS is needed.
51	12/12/2025	Ariana Finholdt	arianaf@gppaustin.com	NA	My husband and I attended the open house last night for the ESC project. We are lifetime residents of Steele County. We have concerns about this project. One of the main issues is its impact on the environment. We'd like to request a full Environmental Impact Statement. Are you able to provide this information? We'd also like to know how much research has been done about extending 34th Ave. This road is already in place and extending it would seem like an option to consider. There are no neighborhoods along that path, and there would be room for expansion for future developments. We live on Hill Drive and do feel a road is needed to streamline traffic south. We take pride in nature and the environment for the future of all. We moved from our country home on 10 acres to 1.5 acres on Hill Drive over 8 years ago to keep our country feel but closer to town. Sadly, we have seen major impacts of the development and destruction of the many mature trees/woods and established wildlife west of Hill Drive over the past couple of years. It's awful to see how these new homes and street behind have changed the dynamics of nature on our road and wooded properties of Hill Dr. The current project seems outdated and needs new research and facts about how this major road will impact the environment, including air pollution, noise, light pollution, and the safety of our community. Please listen to residents' concerns and respond with valid and factual answers. Last night when asking some of these questions, we felt we were given scripted answers by the few leaders that spoke to us. This project needs to be done right for the future of Owatonna.	**EIS** The county board will determine whether an EIS is needed. **Alternatives/34th** Please see response to Comment 1. **Outdated Information - New Research and Facts - Air Pollution, Noise, Light Pollution, Safety** Please see response to Comment 20 regarding noise and safety. Please see response to Comment 25 regarding light and air pollution.
52	12/13/2025	Donald/Susan Mullenbach	dsmully@msn.com	NA	Last night at the ESC Open house, we had a conversation about the yellow circle on a map designated “Future Destination”. You asked me if I got that information from Face Book. I want to follow up on my concerns that I believe were not heard. The identification of future destination came from the EAW NOT Facebook. Let me clarify my position. I do not believe the East Side Corridor meets a transportation purpose based on supporting future development. Facilitating development does not establish transportation need, particularly where existing transportation problems are unsupported elsewhere in the record. The EAW's identification of a future “destination” adjacent to the corridor raises concerns that the project is being structured to enable development rather than address documented transportation demand. Because this justification relies on future development rather than demonstrated transportation need, further environmental review is warranted, including consideration of whether a full Environmental Impact Statement (EIS) is required.	**Development/Future Destination** The future destination area included in the traffic information (Section 20 of the EAW and in Attachment K) is for planned development consistent with the city's comprehensive plan. The destination being referenced is a future school on property owned by the school district. Planned land uses were used to help project future traffic volumes for the roadway (29th Ave) which range between 2,500 and 3,500 in 2046 as noted in the EAW. Information on future traffic is required for the EAW. **Purpose and Need** The purpose and need in Section 6 of the EAW indicates the existing transportation problems that exist (lack of existing continuous north-south routes, traffic having to go to the downtown due to lack of routes, and traffic using neighborhood streets which are not designed for through traffic) today. The proposed project addresses those concerns by providing continuity near existing development/traffic demand. It is also able to accommodate additional growth in the community. Please see response to Comment 1.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
53	12/17/2025	Donald/Susan Mullenbach	dsmully@msn.com	NA	I attended the Public Open House on the East Side Corridor to voice my concerns and hopefully have those concerns considered. Was I deceived by predetermination? I am submitting this comment to address concerns of predetermination under MEPA related to the East Side Corridor. The Environmental Assessment Worksheet (EAW) is intended to inform decision-makers before commitments are made. Minnesota Rules prohibit actions that tend to determine subsequent development or limit reasonable alternatives while environmental review is ongoing. Here, Resolutions of Support adopted by cooperating governmental units are referenced in the EAW and collectively point to the same project alternative. The Township resolution does so through designation of the corridor via the outlots, and the City resolution through explicit support of Alternative 3. These resolutions were adopted, or advanced, prior to completion of environmental review. Their inclusion in the project record reflects existing commitments to a specific alternative, which narrows the field of reasonable alternatives and cannot be disregarded or neutralized simply by noting their existence. When commitments to a specific alternative are made before environmental review is complete, the EAW risks becoming a justification for a predetermined outcome rather than a neutral evaluation of impacts and alternatives. This undermines the purpose of MEPA and compromises meaningful public participation. For these reasons, the EAW is procedurally and substantively deficient and cannot support a lawful Finding of No Significant Impact. Where predetermination has limited reasonable alternatives and meaningful public participation, MEPA requires preparation of a full Environmental Impact Statement. Environmental review must inform decisions — not follow them. Respectfully submitted, Susan Mullenbach	**Resolutions** Other governmental agencies are allowed to provide comment and input on their preferences for alternatives. The township indicated in their resolution that it was consistent with the annexation agreement and that is why they supported it. It was included as full disclosure of the township's interest in the project and its annexation agreement with the city, but it did not determine the alternative under review in EAW. The city of Owatonna chose to submit a resolution in support of the project. It was not at the county's behest. Please see response to Comment 232. **Alternatives Analysis** Preparation of an EAW does not require an alternatives analysis under MEPA. **EIS** The county board will determine whether an EIS is needed and whether a FONSI can be issued under MEPA.
54	12/18/2025	Gale Jorgensen	watersprite57@yahoo.com	NA	I have grave concerns regarding how this project has proceeded. First of all , it makes much more sense to restore 34th to a thru road as it was platted and designed. And that would be to build the # 3 choice aka 29th St. Which has significant impacts to neighborhoods & farms in Steele county. As I've been following this project over the years , there seems to be a continued lack of respect towards the citizens to which this project affects the most. The residents whose properties are adjacent to the planned roadway , and to the citizens who are taxed for this project. It doesn't take that more time , to make sure that the ' i ' is dotted and the t's are crossed. In this case , to make sure that the right noise studies are presented. That the eaw are complete before open houses. That if there is a township agreement, that it's available for review. That representatives of neighborhoods affected would also be allowed to attend meetings such and joint transportation committee. So they could discuss concerns with their representatives afterwards. And certainly that no government authority votes and signs off on this before the e a w processes / comment period is finished. As well as having all information presented , available . Without roadblocks over simple data requests. That's just silly. It puts projects behind . And it erodes public trust. It erodes my trust in you over any future project. I realize your new to the job here. And it's not fair to you. But I'm being honest in how I feel , what I'm seeing .	**Restore 34th** Comment noted. The county board will determine whether there is potential for significant impacts under MEPA. **Respect** Comment noted. **Dotted Is and Crossed Ts** **Noise** information in the EAW is consistent with MEPA requirements. Under MEPA, the project is exempt from state noise standards as the roadway will be owned by the county and it is not a fully controlled access facility. The county did consider the change in condition with a roadway near existing development and made design changes to lessen sound impacts and has offered to provide additional buffering/mitigation between the roadway and existing development. Those buffering opportunities are identified in the EAW. In terms of design, the county changed the design speed from 55 miles per hour to 40 miles per hour, included roundabouts at key intersections near developed areas to help slow traffic, used an urban design near developed areas, and shifted the roadway to the east within identified right of way to provide better separation between the roadway and homes. **Complete EAW** - information in the EAW was considered complete. The Findings of Fact and Conclusions (FOFC) has additional clarifications and updates. **Township Agreement** - the orderly annexation agreement is an attachment in the EAW (Attachment C). **Attend Meetings** - Comment noted. Residents have had multiple opportunities to discuss the project with elected officials. There have been open house meetings, stakeholder/neighborhood meetings individual property owner meetings, and opportunities at county board and city council meetings. MEPA does not require public participation in the development of the project, but the county provided those opportunities. **City of Owatonna Resolution** - the city is allowed to provide comments/resolution during the public comment period, as are other government agencies. The city is not the RGU.
54					To me , a lay person , a person paying for this project with their taxes. It seems like this road. The east side corridor on 29 the was created to benefit speculative developers , rather then the current community it should serve. I don't have an issue with anyone earning a living , or investing for their future. I do have an issue with, a big issue if they are using my money to build their business. In this case with my tax dollars. A designated destination is just that. Other versions of an esc routes serve as a north south route just as well , without the impact on existing neighborhoods. And a restoration of 34th preserves farms as well. The noise study needs to be presented to the residents affected , as well as the elected officials. In fact the noise study shows that more homes then those right on the proposed 29th St / # 3 are affected. As well as farmland. To be fair to those other households , they need to be brought into the conversation. If that means door knocking , so be it. I believe this project now needs an EIS . I need to feel that this project is thoughtfully proceeding. And not ramrodded thru. It's not fair to the elected officials , not to have all of the facts (noise studies for example) . They represent us , the citizens. Without transparency it appears that everyone is working for a future development / developer. Rather than a current traffic need. The noise study needs to be presented to the residents affected , as well as the elected officials. In fact the noise study shows that more homes then those right on the proposed 29th St / # 3 are affected. As well as farmland. To be fair to those other households , they need to be brought into the conversation. If that means door knocking , so be it.	**Data Requests** Comment noted. **Speculative Development** See response to Comments 1 and 31 regarding project need. **Farmland** Comment noted. **EIS** The county board will determine if an EIS is needed under MEPA.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
54					That the Owatonna city council voted on a resolution of support before the e a w processes / public comment period is finished grieves me. It grieves me personally. I advocated for ADA laws. Because of my dyslexia , it takes my a crazy amount of time to string a sentence together , much less a letter. That vote invalidates what I have to say. I'm not asking for extra time for my response , as I could with ADA . But if civil engineers take great care to abide by the letter of the law in regards to ADA compliance for example for such things as sidewalks. then too you much look at the spirt of the law , and how it affects things like a persons voice in the process. I need every one of these days allowed to form a coherent and thoughtful response. This vote is showing me that minds were made up long before the process started. Predetermination . No idea , why the Owatonna city engineer asked the city council of Owatonna to vote on a resolution before the e a w public comment closed. But because your the desk where the buck stops ... the responsible government authority. You're the one who has to deal with it. I have no idea how to unringing that bell. All I know it will cause more frustration , anger , angst ; more money , time , resources . When to me a layperson. Communication and inclusion was always key. When to me , a layperson . Restoration of 34th is the simple solution. The elegant solution ... Thank you so much for your time and consideration in this matter. Gale Jorgensen.	
55	12/18/2025	Haley Byron, Minnesota Department of Natural Resources - Division of Ecological & Water Resources, Region 4 (South Region)	haley.byron@state.mn.us	21371 Hwy 15 S, New Ulm, MN 56073	Please see the attached DNR comment letter for the proposed Owatonna East Side/29th Ave Corridor Environmental Assessment Worksheet.	**Section 12. Water Resources** The FOFC has been updated to include a Public Waters Work Permit. The county will continue to work with the DNR through final design of the bridge and apply for a permit if it is needed. **Section 14. Fish, Wildlife, Plan Communities, and Sensitive Ecological Resources (Rare Features)** The county will contract with a qualified surveyor to determine if a botanical survey is needed for the Moderate Biodiversity Significance site near the Canadian Pacific/Kansas City Railroad along the proposed 29th Ave. The county will work with the DNR on the survey and incorporate any avoidance and/or mitigation activities as a result of the survey. **Attachments** The DNR provided standard erosion control and invasive species prevention best practices. The county will incorporate as applicable.
56	12/19/2025	Jerry Pettipiece	jerrypettipiece@gmail.com	NA	I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Based on the information provided in the EAW and materials withheld from the public, the project clearly exceeds the threshold for significant environmental effects under Minnesota Rules 4410.1200. The EAW is incomplete, improperly segmented, and fails to analyze required impacts related to noise, safety, air quality, human health, traffic, environmental justice, and cumulative effects. Independent oversight and an independent RGU are necessary to ensure compliance with MEPA and NEPA. Further, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**EIS** The county board will determine if an EIS is needed in accordance with MEPA requirements. **Incomplete** **Segmentation** - this is a federal term. The project does not have federal funding and is not a federal undertaking. See response to Comment 28 and Comments 248 and 249. If the concern is connected actions under MEPA no context in the comment is provided to respond. **Noise** - See response to Comment 54 **Safety** - Is not required to be studied in MEPA. The county took safety into consideration with its design. Design elements to promote safety include: low-speed design, roundabouts at intersections to slow travel speeds and to provide non-motorized users with better crossings of the roadway, used an urban design in developed areas to reduce the roadway footprint, incorporated at trail for non-motorized users, shifted the roadway to the east within identified right of way to provide better separation between homes and the roadway, and is incorporating berming to provide better separation and screening between development and the roadway. **Air Quality** - Sections 17 and 18 of the EAW address air quality. **Human Health** - see response above. Other items are not required under MEPA. **Environmental Justice** - not required under MEPA. Was a federal requirement until early 2025 when President Trump issued Executive Presidential Orders to have it removed from federal environmental review. **Traffic** - Please refer to Section 20 of the EAW and Attachment K which provide information on traffic as well as Section 6, which includes the purpose and need. **Cumulative Effects** - Please refer to Section 21 of the EAW which describes potential cumulative effects. Independent Oversight and Independent RGU - these requirements were met. NEPA - see response above, project is not subject to NEPA **FONSI** See responses above. The EAW was complete. An EAW under MEPA does not require alternatives or an alternatives analysis.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
57	12/19/2025	Jerry Pettipiece	jerrypettipiece@gmail.com	NA	Steele County, the City of Owatonna, and their consultants improperly segmented a single, connected transportation and development system into multiple projects to avoid full environmental review. The following projects function as connected actions and must be reviewed together: •East Side Corridor (ESC) •18th Street expansion and trails •18th St. railroad roundabout •26th St. roundabout •Owatonna High School relocation •Utility expansions and substation upgrades •Havana intersection project •Main Street project •Fire and Police Station relocation •Adjacent housing and commercial development identified in Imagine Owatonna Federal and state law prohibit segmentation when projects: •depend on one another, •are justified by the same traffic or development need, or •cumulatively increase impacts. Here, each project was used to justify the next, while being excluded from environmental analysis. This is classic segmentation and requires a single, unified EIS. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	See responses to Comments 61 and 58. **Additional projects in this list not included in comments referred to.** - 26th St Roundabout (part of the east side corridor project - it is included in the EAW) - Havana Intersection (part of the east side corridor project - it is included in the EAW) - Utility substations and Upgrades - Utility improvements are not connected to the east side corridor. Neither project induced the other, neither project is a prerequisite for another, and each project can be justified on its own. The east side corridor is intended to address north-south transportation needs. - Fire and Police Station Projects. Neither project induced the other, neither project is a prerequisite for another, and each project can be justified on its own. The east side corridor is intended to address north-south transportation needs. - Adjacent housing and commercial development identified in Imagine Owatonna - comprehensive plans are generally not reviewed under MEPA because they are policy-level, not project-level, no physical change is authorized. Specific development proposals that meet state EAW or EIS thresholds would be subject to review. Information in Imagine Owatonna did not induce the need for the east side corridor (there are existing transportation problems), neither is a prerequisite for another, and each can be justified on its own. The east side corridor is intended to address north-south transportation needs. Imagine Owatonna is a policy document, not a project. **Federal and State Law Prohibit Segmentation** Information included in the comment is not accurate. Under MEPA, it is connected actions as noted in previous responses to comments. Segmentation is a federal requirement and the project is not a federal undertaking. **EIS** See above. The county board will determine if an EIS is needed under MEPA. **FONSI** See response to Comment 56
58	12/20/2025	Eric/Jenelle Gustafson	epgust-2023@outlook.com	2264 Hill Drive, Owatonna, MN 55060	The EAW fails to address critical safety issues related to the 18th Street railroad roundabout, which was constructed without required federal permits at a non-compliant distance. This intersection is the primary southern access point of the ESC, yet it was excluded from the environmental review. It was also coupled with the ESC project because WSB was the consultant on both projects. These omissions represent significant environmental and safety risks and require preparation of a full EIS. Additionally, FONSI requires a complete, accurate, and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**18th St Roundabout** The 18th St Roundabout was not a part of the project under review. The 18th St project was developed prior to the east side corridor project. It is being built to address safety and mobility problems at the intersection of 18th St and Bixby Rd. While the project is next to the proposed project (east side corridor) neither project meets the criteria for a connected action under MEPA. The proposed project (east side corridor) did not require a roundabout to be built at 18th St and Bixby and vice versa; neither project was a prerequisite for the other; and each project has its own justification/purpose and need. As noted in the EAW, the purpose and need for the project (east side corridor) is north-south connectivity. Consultants working on the project has nothing to do with connected actions. **Omissions Require EIS** See response above. The county board will determine whether and EIS is needed under MEPA. **FONSI** See responses above. An EAW under MEPA does not require an alternatives analysis.
59	12/20/2025	Eric/Jenelle Gustafson	epgust-2023@outlook.com	2264 Hill Drive, Owatonna, MN 55060	The East Side Corridor EAW does not include required noise and human health analysis. A referenced noise study reportedly indicates the 20-foot noise wall, yet no feasible mitigation or right-of-way analysis is included. As of April 1, 2025 this project was declared a federal undertaking. These deficiencies meet a threshold for significant environmental effects and require a full Environmental Impact Statement. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Noise Study** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. **Federal Undertaking** The project does not have federal funding for construction. Reference to cultural resources was inadvertently left in the document indicating the project was a federal undertaking. Please see Comment 28 and Comments 248 and 249 from MnDOT indicating the project is not a federal undertaking.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
60	12/20/2025	Eric/Jenelle Gustafson	epgust-2023@outlook.com	2264 Hill Drive, Owatonna, MN 55060	Public participation in the East Side Corridor review was inadequate. Notices were late, key documents were withheld, and residents were denied the opportunity to comment after approval of the purpose, need, and preferred alternative. Because the EAW is incomplete and the process flawed, I request a full EIS with independent oversight. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Inadequate Public Participation/Review** The EAW was posted to the EQB as required. It was published on November 18, 2025. The EQB posting included information on where the documents were available, which was the project website and provided a link to the website. The EAW was put on the project website the day the notice was published in the EQB. The EQB posting included information on the public meeting date and location. As required, a legal notice was published to the local paper which included information on the availability of the documents and included information on the public meeting. There was an error on the comment end date in the original publication to the EQB, as the county was extending the public comment period beyond the required 30 days to due to the upcoming holiday (Thanksgiving). A second notice was published to the EQB the following week showing the extended comment period to end on December 31. The EAW provided the information required under MEPA and its supporting documentation. At one point, the project had federal funding. Federal funding was removed from the project and is not a federal undertaking. See response to Comment 28 and Comments 248 and 249. Therefore the project is not subject to federal requirements and analyses. Under MEPA and NEPA for that matter, the public is not required to provide comment after every decision on a project is made. Furthermore, under MEPA, public participation and input is not required during project development - the public is to provide input during a 30-day public comment period. The county afforded numerous opportunities to provide input on the project - going beyond MEPA requirements. **EIS** The county board will determine whether an EIS is required under MEPA. **FONSI** See response to comment 58. Comment noted.
61	12/20/2025	Eric/Jenelle Gustafson	epgust-2023@outlook.com	2264 Hill Drive, Owatonna, MN 55060	The East Side Corridor cannot be reviewed in isolation. It is functionally connected to the 18th Street expansion, railroad roundabout, high school relocation, utility expansions, and Main Street project. These connected actions were improperly segmented to minimize impacts. Under MEPA and NEPA, a unified Environmental Impact Statement is required. I formally request a full EIS and an independent RGU. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Connected Actions** If multiple actions are connected, environmental review may be needed for the project that may not have been required if it was a standalone action. Three types of relationships between projects qualify as connected actions (part 4410.0200, subpart 9c): One project induces the other; One project is a prerequisite for the other and is not justified by itself (the first occurring previously or simultaneously); or Neither project is justified by itself; that is, the two projects are interdependent parts of a larger whole project. Whenever two or more projects are related in any of these ways, they must be considered as one project, regardless of ownership or timing (parts 4410.1000 and 4410.2000, subparts 4). **18th Street Expansion:** First, it is not an expansion project. The city of Owatonna is reconstructing a portion of an existing roadway between Austin Rd and Cornerstone Lane. The project includes a trail, stormwater improvements, and utility work. This project is being initiated because the roadway is in poor condition and to provide a non-motorized connection to the existing trail that accesses the high school. This project is undergoing federal environmental review. The purpose and need of the east side corridor is to provide a link between the northern and southern portions of the community and to address walkability and bikeability needs. Neither project induced the other, neither project is a prerequisite for another, and each project can be justified on its own. **18th St Roundabout at Bixby Road.** See response to Comment 58 **High School Relocation:** The Owatonna School District relocated the high school t address its aging infrastructure. The purpose and need of the east side corridor is to provide a link between the northern and southern portions of the community and to address walkability and bikeability needs. Neither project induced the other, neither project is a prerequisite for another, and each project can be justified on its own.
61						**Utility Expansions** Unaware of what is being referred to. **Main St Project** Main Street, an east-west roadway between South Oak and South Grove is being reconstructed to eliminate a travel lane, to improve intersection traffic control, to improve sidewalk connections and to enhance pedestrian crossings in the downtown. It does not connect to the proposed project and is to address transportation problems in the area. The purpose and need of the east side corridor is to provide a link between the northern and southern portions of the community and to address walkability and bikeability needs. Neither project induced the other, neither project is a prerequisite for another, and each project can be justified on its own. **MEPA and NEPA Require EIS** The county board will determine if an EIS is needed under MEPA. NEPA is not applicable as the project is not a federal undertaking. See response to Comment 28 and Comments 248 and 249. **FONSI** See response to comment 58. Comment noted.

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62	12/20/2025	Eric/Jenelle Gustafson	epgust-2023@outlook.com	2264 Hill Drive, Owatonna, MN 55060	1. Formal Request for an EIS I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Based on the information provided in the EAW and materials withheld from the public, the project clear1y exceeds the threshold for significant environmental effects under Minnesota Rules 4410.1200. The EAW is incomplete, improperly segmented, and fails to analyze required impacts related to noise, safety, air quality, human health, traffic, environmental justice, and cumulative effects. Independent oversight and an independent RGU are necessary to ensure compliance with MEPA and NEPA. Further, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. 2. Improper Segmentation of Connected Projects Steele County, the City of Owatonna, and their consultants improperly segmented a single, connected transportation and development system into multiple projects to avoid full environmental review. The following projects function as connected actions and must be reviewed together: •East Side Corridor (ESC} •18th Street expansion and trails •18th St. railroad roundabout •26th St. roundabout •Owatonna High School relocation •Utility expansions and substation upgrades •Havana intersection project •Main Street project •Fire and Police Station relocation •Adjacent housing and commercial development identified in Imagine Owatonna	**Formal Request for EIS** The county board will determine whether an EIS is needed under MEPA requirements. **Improper Segmentation of Connected Projects** Segmentation is a NEPA standard and does not apply as the project does not have federal funding for construction and is not a federal undertaking. Connected Actions are discussed under MEPA. Projects identified in the list are not connected actions. Please see responses to Comments 57, 58 and 61.
62					Federal and state law prohibit segmentation when projects: •depend on one another, •are justified by the same traffic or development need, or •cumulatively increase impacts. Here, each project was used to justify the next, while being excluded from environmental analysis. This is classic segmentation and requires a single, unified EIS. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. 3. Federal Nexus Requires Federal-Level Review The ESC project has a clear federal nexus, triggering NEPA requirements: •A railroad crossing requiring federal permits •Federal funding used for related roadway and roundabout construction •Federal documents referenced in the EAW and on the project website •As of April 1, 2025, this project was declared a federal undertaking Despite this, the EAW fails to address federally required noise, safety, and health analyses. Federal actions were relied upon to make substantial decisions, yet federal environmental standards were not applied. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Federal Nexus Requires Federal-Level Review** The project does not have federal funding and does not have a federal nexus. Federal funding has been removed from the project. Please see response to Comment 28 and Comments 248 and 249. Information regarding cultural resources (Section 15 of the EAW and its attachment) inadvertently included reference to a federal undertaking. Permits issued by federal agencies do not require full NEPA documentation. **FONSI** See response to Comment 58
62					4. Railroad Roundabout Safety and Permit Violations The 18th Street railroad roundabout was constructed without required federal railroad permits and at a non-compliant distance: •Railroad standards require 200 feet separation •The County built it at approximately 150 feet •The railroad refused responsibility •The County now refuses responsibility *It was also coupled with the ESC project because WSB was the consultant on both projects This intersection is the primary southern access point of the ESC, yet it was excluded from the ESC EAW. It will likely need to be rebuilt during ESC construction, creating significant safety, cost, and construction impacts that were never disclosed. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. 5. Missing Required Impact Analyses The EAW fails to include required analyses under Minnesota Rules, including: •Noise impacts (no published noise study; residents were denied access). 371 homes impacted by noise. 82 are substantially impacted •Safety impacts (railroad, roundabouts, emergency response) •Human health impacts •Noise impacts Visual impacts •Wetlands and environmental resources •Flood plain and farmland impacts A referenced noise study reportedly indicates a need for a 20-foot noise wall, yet there is insufficient right-of-way to construct one. This alone demonstrates significant environmental effects requiring an EIS. f formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Railroad Roundabout Safety and Permit Violations** This is a separate project. See response above about connected actions. Having the same consultant is not a coupled or connected action. **Missing Required Impact Analysis** **Noise** - The EAW contains information required under MEPA. Under MEPA the project is exempt from state noise standards as the roadway is owned by a county and is not a fully access controlled facility. The county, consistent with MEPA did consider adjacent development next to the roadway and incorporated design elements to slow speeds which will reduce noise impacts and has identified screening to help separate the roadway from existing development. Please see responses to Comments 48 and 54. **Safety** - Roundabouts are a recognized as providing a safety benefit. They slow traffic, eliminate conflicting movements between vehicles, provide better opportunities for pedestrians to cross traffic as they only have to watch for one lane and direction of travel at a time. Roundabouts can reduce severe and fatal crashes by 90 percent (NCHRP 1043). The proposed railroad crossings currently do not have gates and flashers. The project will include gates, flashers and bells and the roadway will be shifted to provide better separation between vehicles and the railroad and a better approach angle for crossing. Emergency responders will have a more direct route to respond to calls. **Visual Impacts** - A visual impact analysis was included in the EAW - Section 16 and Attachment J. It did not include noise walls, as noise walls are not going to be built. **Wetlands** - Wetland impacts are discussed in Section 12 of the EAW and it is noted that a permit will be needed for the impacts. **Floodplain** - Floodplain impacts are discussed in Section 12 of the EAW and a floodplain analysis is included in Attachment D. **Farmland** - Farmland impacts are noted in Section 10 of the EAW. **EIS** See above **FONSI** See above

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62					6. Predetermination of Outcome Project records show clear predetermination: •Preferred alternatives were identified before the project was public •Alternatives were dismissed using assumptions rather than calculations •Avoidance options were not fully evaluated despite being cheaper •Right-of-way abandonment occurred over decades without contention •No road of this proximity to homes has ever been built in Steele County Environmental review cannot occur after decisions have already been made. The EAW was used to justify a predetermined outcome, not evaluate alternatives. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. 7. Procedural Violations and Withheld Information The public process was fundamentally flawed: •Only two days' notice for the first open house •Notice of the EAW comment period received two weeks late •RFPs were signed before public disclosure •RFPs and study data were withheld from public access •A 61-page federal memorandum was kept from residents •Residents were denied a comment period after approval of purpose, need, and preferred alternative on 9/24/2024 These actions denied residents the opportunity to correct inaccuracies before information was submitted to state and federal agencies. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Predetermined Outcomes** Development of an EAW under MEPA does not require an alternatives analysis. It requires identifying the projects need, describing what the project entails and the impacts of the project. The EAW for the east side corridor does this. Avoidance is not required under MEPA. Other items - comment noted. See previous responses regarding EIS and FONSI. **Procedural Violations and Withheld Information** See response to Comments 193, 236, 75. At one point the project had federal funding and a noise study was completed in conjunction with federal requirements, which are different than MEPA requirements. The noise study was not included because it is not relevant to MEPA. MEPA does not require a public participation in the development of the project. MEPA requires a 30-day public comment period for the published EAW, which the county provided. It provided an extended period due to the Thanksgiving Holiday. It also provided multiple opportunities for residents to participate. There are no requirements under MEPA to have public input after every decision. See previous responses regarding EIS and FONSI.
62					8. Incomplete and Misleading EAW The ESC document is not a true "worksheet." It includes finalized construction steps, limits alternatives, and omits key data. It is not short, not understandable to the public, and lacks transparency. Key concerns include: •Five roundabouts with no comprehensive safety analysis •No identified engineer responsible for critical decisions •No study of acquisition and relocation impacts I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. 9. Conclusion When viewed as a whole, the East Side Corridor and its related projects form a single regional transportation and development plan. Their cumulative impacts are significant and have never been properly disclosed or analyzed. For these reasons, I request: •A full Environmental Impact Statement (EIS) •Independent environmental oversight •An independent Responsible Governmental Unit (RGU) •A unified review of all connected actions Anything less would violate the intent and requirements of MEPA and NEPA and deny the public meaningful environmental review. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Incomplete and Misleading EAW** See previous responses above regarding MEPA requirements. The roundabouts are a design decision. As noted above roundabouts are a proven safety feature reducing severe and fatal crashes, slowing traffic, and providing better opportunities for non-motorized users to cross roadways. The county provided oversight of the development of the document, always having a county engineer/public works director on staff The EAW identifies right of way acquisition. There are no relocations as part of the project. See previous responses regarding EIS and FONSI. **Conclusion** See previous response regarding EIS and responses to comments.

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63	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing the County's continued withholding of Project-related public data in violation of the Minnesota Government Data Practices Act and the resulting failure to provide meaningful public participation as required under the Minnesota Environmental Policy Act. The Minnesota Office of Administrative Hearings has issued Findings of Fact, Conclusions of Law, and Order determining that Steele County violated the Minnesota Government Data Practices Act in its handling of public data requests related to this Project and ordering the County to comply with the law. Despite this adjudicated violation and court order, Steele County has documented—through written correspondence during the EAW process—that responsive Project-related data will not be completed or meaningfully available until after the close of the EAW comment period on December 31, 2025. The County's own status updates identify estimated completion dates extending into January and February 2026, including for datasets directly relevant to environmental review, such as commissioner emails, traffic-related correspondence, federal funds records, and consultant communications . Failure to Provide Meaningful Public Participation Under Minn. R. 4410, environmental review must provide the public with a meaningful opportunity to evaluate environmental impacts at a time when that information can influence the decision-making process. Proceeding with the EAW while acknowledging that essential Project data will not be available until after December 31, 2025 deprives the public of the ability to: •Evaluate the accuracy of the EAW's noise, traffic, safety, and human health conclusions •Identify inaccuracies, omissions, or contradictions in the EAW •Meaningfully comment on environmental significance, alternatives, avoidance options, or mitigation The County's correspondence further documents that data provided to date has been delivered in degraded and non-standard formats, limiting usability and preventing meaningful review within the comment period . An EAW conducted under these conditions cannot satisfy MEPA's public participation requirements.	Data needed to support the EAW is included in the document and as attachments in accordance with MEPA. The public has access to this information in the text of the document and its attachments to provide meaningful public participation. As noted, MEPA does not require an alternatives analysis for an EAW and does not require avoidance.
63					The County May Not Rely on Withheld or Inaccessible Information Minnesota law does not permit a Responsible Government Unit to rely on information in its possession to support an environmental decision when that information was not made available to the public during environmental review. Here, the County: •Was found by a court to have violated data practices law •Was ordered to correct its data practices •Has acknowledged that responsive ESC data exists •Has documented that completion and meaningful access will occur after the EAW comment period closes As a result, any decision based on the EAW would necessarily rely on information that the public was denied the opportunity to review and comment on, rendering the environmental review legally insufficient. Impact on the Integrity of the EAW The continued withholding and inaccessibility of Project data compounds multiple substantive deficiencies already identified in the EAW, including: •Missing or inadequate noise analysis •Unsupported traffic and travel-time assumptions •Failure to evaluate safety impacts •Inadequate cumulative effects analysis •Premature elimination of alternatives •Predetermination of the Project alignment The procedural violation does not stand alone; it undermines the integrity of the entire EAW record. Requirement for an EIS and Independent Oversight Because the EAW process has proceeded while relevant, court-ordered public data remains unavailable—and will remain so until after December 31, 2025—the Responsible Government Unit cannot lawfully conclude that the Project will not have significant environmental effects. Accordingly, the Responsible Government Unit must require preparation of a full Environmental Impact Statement (EIS) pursuant to Minn. R. 4410. Given the adjudicated data practices violations and documented failure to provide timely, usable access to Project data, I further request independent oversight and assignment of an independent Responsible	**Withheld or Inaccessible Information** Data needed to support the EAW is included in the document and as attachments in accordance with MEPA. **Continued Withholding of Data** **Noise** - Project no longer has federal funding nor is a federal undertaking. Federally required noise analyses are not applicable to MEPA requirements. **Traffic** - Please see Section 20 of the EAW and attachment K. **Safety** - Safety was considered. Detailed safety studies are not required. See response to Comment 62 and 20 about safety considerations and design elements. **Cumulative Effects** - Section 21 of the EAW documents cumulative impacts/effects. **Alternatives** - Development of an EAW under MEPA does not require an alternatives analysis. **Predetermination** - Federal context requirement. See above on alternatives regarding MEPA. **EIS and Oversight** The county board will determine whether an EIS is needed under MEPA. Comment noted. **Attachments - Forwarded Email and Minnesota Court of Administrative Hearings** See response to Comments 45 and 45B
63A	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060		Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA. See response to comments 45 and 45B
63B	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060		Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA. See response to comments 45 and 45B
64					No Comment Included in #64	
65					No Comment Included in #65	

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66	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing deficiencies in the EAW's air quality and human health analysis. The EAW concludes that no air quality analysis is required because Minnesota is in attainment with the National Ambient Air Quality Standards. While attainment status may address regional conformity, it does not satisfy the Minnesota Environmental Policy Act's requirement to evaluate localized air quality and human health impacts, particularly where residences are located in extreme proximity to a new roadway. Under Minn. R. 4410, an EAW must evaluate whether a project may cause significant environmental effects, including effects on human health, based on the nature, magnitude, duration, and location of those impacts. The EAW fails to analyze near-roadway air quality impacts to residences located approximately 17 feet from the proposed roadway, including but not limited to: •Mobile Source Air Toxics (MSATs), including diesel particulate matter •Fine particulate matter (PM2.5) •Ultrafine particles associated with braking, acceleration, and heavy vehicles •Long-term exposure risks to residents living immediately adjacent to traffic lanes Scientific and regulatory guidance consistently recognizes that pollutant concentrations are highest within the first 50 to 100 feet of roadways, where exposure risks are most severe. Despite this well-established principle, the EAW does not: •Identify or map near-roadway residential receptors •Quantify pollutant exposure at those residences •Evaluate long-term exposure duration or cumulative health risks •Identify sensitive populations such as children, elderly residents, or individuals with respiratory or cardiovascular conditions	The EAW contains information on air quality and greenhouse gas emissions (Sections 17 and 18). A detailed air quality analysis not required, nor are there tools available that get at detailed results at a corridor or individual parcel level. Projected traffic volumes on the roadway are well below the capacity of the roadway (3,500 vehicles a day in the future of a roadway that has a capacity of at least 10,000). The roadway volume to capacity ratio is 0.35, which indicates the roadway is not congested, even in the future. When there is no reason to expect traffic congestion, the project will not cause any significant decrease in air quality.
66					Instead, the EAW relies on generalized statements regarding regional air quality attainment and fleet-wide emissions trends. This approach masks localized exposure risks and does not provide the site-specific information necessary to determine whether air quality impacts may be significant at the most affected residences. Minnesota law requires environmental review to disclose reasonably foreseeable localized impacts, not to rely solely on regional compliance determinations. Where residences are located approximately 17 feet from a new roadway, the potential for long-term human health impacts from vehicle emissions is foreseeable and must be evaluated. Because the EAW does not analyze near-roadway air quality or human health impacts for residences in extreme proximity, it lacks the information necessary to support a negative declaration. Accordingly, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410.	
67	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing deficiencies in the Project's noise analysis. While the EAW includes general information regarding construction noise and acknowledges the presence of residential land uses along the corridor, it fails to analyze long-term operational noise impacts at residences located in extreme proximity to the proposed roadway, including homes approximately 17 feet from the roadway edge. Under Minn. R. 4410, an EAW must evaluate whether a project may cause significant environmental effects by considering the magnitude, duration, frequency, and sensitivity of the receiving environment. Noise impacts to residences are explicitly required to be evaluated in an EAW. The EAW does not: •Model projected operational roadway noise at nearby residences •Analyze daytime and nighttime noise exposure •Compare projected noise levels to Minnesota residential noise standards •Evaluate noise generated by braking and acceleration at roundabouts •Evaluate heavy truck traffic, emergency vehicles, or winter maintenance noise •Assess whether noise impacts would be continuous, unavoidable, or permanent Instead, the EAW relies primarily on construction noise tables and generalized statements that noise impacts are temporary or manageable. Construction noise analysis does not satisfy MEPA requirements where permanent operational noise is the primary concern. Where residences are located approximately 17 feet from a new roadway, exceedances of residential noise standards are reasonably foreseeable, particularly during nighttime hours and winter operations. The EAW's failure to quantify these impacts obscures their severity and prevents informed public review. The EAW also defers identification of noise mitigation measures and does not evaluate whether such mitigation would be feasible or effective given site constraints. Undefined or future mitigation cannot be relied upon to justify a negative declaration. Because the Project has the potential to result in significant, long-term operational noise impacts to residences in extreme proximity, and because those impacts were not adequately analyzed in the EAW, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410.	**Noise** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. See responses to Comments 20, 48, and 54 regarding considerations the county took with regard to noise. Please note, there are no homes within 17 feet of the roadway. The closest homes (2) are approximately 65 feet away, most are in excess of 100 feet. **EIS** The county board will determine whether an EIS is needed.

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68	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing the EAW's failure to evaluate safety impacts to adjacent residences as environmental effects. Under the Minnesota Environmental Policy Act, environmental review must evaluate impacts to human health and safety where those impacts result from a physical environmental change. A roadway located in extreme proximity to occupied residences creates foreseeable safety risks that must be disclosed and analyzed. Under Minn. R. 4410, an EAW must provide sufficient information to determine whether a project may cause significant environmental effects, including impacts related to safety and the use of property. Despite proposing a new roadway located approximately 17 feet from existing homes, the EAW does not analyze foreseeable safety impacts, including: •Run-off-road crashes and vehicle intrusion into residential yards •Winter maintenance hazards, including snow spray and ice throw •Headlight glare and nighttime safety impacts affecting residential use •Pedestrian and driveway access conflicts created by increased traffic •Emergency access and response considerations for adjacent homes These safety concerns are not speculative. They are direct and foreseeable consequences of placing a transportation facility in extreme proximity to occupied residences. The EAW treats safety primarily as a traffic engineering or operational issue, rather than as an environmental effect requiring disclosure and analysis. This approach does not satisfy MEPA's requirement that safety-related impacts be evaluated where they stem from environmental change. The absence of safety analysis is particularly significant given that the EAW also defers mitigation measures intended to buffer residences from the roadway. Without analyzing safety impacts or the effectiveness of mitigation, the Responsible Government Unit cannot determine whether such impacts would be significant, unavoidable, or irreversible. Because the Project has the potential to result in significant safety-related environmental effects to residences located in extreme proximity, and because those effects were not adequately analyzed in the EAW, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410.	**Proximity to Homes** Please note, there are no homes within 17 feet of the roadway. The closest homes (2) are approximately 65 feet away, most are in excess of 100 feet. **Safety Impacts** Safety is not an environmental effect and is not required for an EAW. The county took safety into consideration. The design speed of the roadway is 40 miles per hour, which is considered a low-speed roadway; roundabouts were included at key intersections to help keep speeds slower and to provide safer crossings for all users; an urban design was used near neighborhoods to decrease the roadway footprint and to help slow speeds near developed areas; and a trail was included in the project to provide a safe location for non-motorized users. The trail also helps to add a buffer between residential areas and the roadway. Access on the roadway is limited and is primarily public streets. A new route provides more direct access for emergency vehicles. The county has also offered to provide berming as noted in Section 19 of the EAW and landscaping as a buffer between the roadway and homes. The berm would be between 2.5 and 3 feet with plantings/trees on top. **EIS** The county board will determine whether there is a need for an EIS under MEPA.
69	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project. While the EAW generally acknowledges the presence of residential neighborhoods along portions of the corridor, it fails to conduct the site-specific analysis required under the Minnesota Environmental Policy Act (MEPA) for residences located in extreme proximity to the proposed roadway—specifically homes located approximately 17 feet from the edge of the roadway. Under Minn. R. 4410, an EAW must evaluate whether a project has the potential for significant environmental effects, considering the type, extent, duration, frequency, and magnitude of impacts, as well as the sensitivity of the affected environment. Where impacts are highly concentrated on a small number of receptors, generalized or corridor-wide analysis is insufficient. The EAW does not: •Identify or map residences located within tens of feet of the roadway •Differentiate between homes in extreme proximity and those located farther away •Quantify noise, air quality, safety, or visual impacts at the most affected residences •Evaluate whether impacts to these homes are unavoidable, irreversible, or disproportionate •Identify or analyze sensitive populations such as children, elderly residents, or individuals with disabilities	**Proximity to homes** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway. **Differentiate between homes in extreme proximity and those located further away** The MEPA process does not require an analysis indicating distance of a proposed corridor proximity to homes. Some analyses are site specific and others are more regionalized - it is based on the resource. See response to Comment 66 regarding air quality. **Quantify noise, air quality, safety or visual impacts at the most affected residences** **Noise** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled and is owned by a county. The county has considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. **Air Quality** The EAW contains information on air quality and greenhouse gas emissions (Sections 17 and 18). See response to Comment 66.

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69					Instead, the EAW treats residential receptors as a uniform category, relying on planning-level assumptions and generalized impact discussions that mask the severity of impacts where they are most acute. This approach conflicts with MEPA's requirement that environmental review disclose impacts where they are greatest, not averaged across a broader corridor. The EAW further states that no "critical facilities" with insufficiently mobile occupants are located within the Project area. This conclusion is unsupported by evidence in the record and improperly substitutes a categorical assumption for the required analysis of actual residential occupants and human health considerations. Minnesota courts have consistently held that an EAW must provide sufficient site-specific information to allow decision-makers and the public to determine whether environmental effects may be significant. By failing to evaluate impacts to residences located approximately 17 feet from a new roadway, the EAW does not provide the information necessary to support a negative declaration. Because the Project has the potential to cause significant, concentrated, and long-term impacts to nearby residences, and because the EAW does not adequately analyze those impacts, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410.	**Safety** Safety is not an environmental effect and is not required for an EAW. Please see response to Comment 68. **Visual Impacts** See Section 16 and Attachment J for visual impact analysis. Please note - there are images specific to the North Country included in the evaluation. **Evaluate whether impacts to these homes are unavoidable, irreversible, or disproportionate** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. Adverse and "disproportionate" impacts was a federal requirement for environmental justice populations. These populations are low-income and minority populations. President Trump removed studying environmental justice impacts as part of presidential executive orders in early 2025. These items are no longer included in federal environmental analyses either. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. As part of the review, the type, extent and reversibility of environmental effects will be considered. Permitting through regulatory agencies is part of the process and their approvals need to be obtained for impacts associated with the project. Minimization and mitigation measures will be used to reduce effects. **Identify or analyze sensitive populations such as children, elderly residents, or individuals with disabilities** This is not required as part of an EAW under MEPA. **Negative Declaration/EIS** The county will determine whether there is a need for an EIS under MEP requirements.
70	12/20/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached document (and attachments on previous emails) as a formal written comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. While the EAW public comment period remains open through December 31, 2025, the City of Owatonna adopted a Resolution of Support on December 16, 2025 endorsing a specific alignment, right-of-way acquisition, cost participation, and reliance on mitigation. This action constitutes predetermination under Minnesota Rules 4410.3100, which prohibit governmental actions during environmental review that tend to determine subsequent development or limit alternatives or mitigation. Residents raised concerns regarding predetermination and MEPA compliance prior to the City's vote, and those concerns were acknowledged on the public record. Despite this, the City proceeded with formal commitments while environmental review remained incomplete. Because commitments to alignment, right-of-way acquisition, and cost sharing occurred during an active EAW, the environmental review is legally deficient and cannot support a lawful Finding of No Significant Impact (FONSI). Under MEPA and NEPA, corrective action and heightened review are required. Please confirm receipt and inclusion of the attached comment in the official record.	**Email - Resolution Discussion** Other governmental agencies are allowed to provide comment during the public comment period. The city of Owatonna chose to submit a resolution in support of the project. They are not the RGU. Please see response to Comment 232. **Email - FONSI** See responses above and below. **Attachment - Formal Predetermination Comment** Comment noted. **Attachment - Predetermination under MEPA** See response above regarding resolution. Minn Rules 4410.3100 - Please see response to Comment 162. MEPA does not require an alternatives analysis for an EAW. An EAW is intended to describe the need for the project, describe the project, and discuss its impacts. It does not require public involvement in the development of the project. **Attachment - Statement on the Record Demonstrating Predetermination** See response above. Avoidance is required under NEPA, it is not under MEPA.
70						**Attachment - Cumulative Predetermination by Cooperating Governmental Units** See responses above. The resolution was included in the EAW to indicate its consistency with the orderly annexation agreement. It was not used to determine the alignment studied in the EAW. The resolution was passed after the removal of federal funding. It is not subject to federal requirements. **Attachment - FHWA Direction and Federal Undertaking** The project does not have federal funding and is not subject to FHWA review or procedures. As noted in the email, it was discussing the city or county not taking action prior to the EAW being completed and provided for public comment. The city is allowed to provide comments during the comment period as they are not the RGU. **Legal Consequence** The project is not subject to NEPA and it complies with MEPA.

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71	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing the EAW's improper deferral of mitigation measures for foreseeable environmental impacts. Throughout the EAW, the Responsible Government Unit states that mitigation measures—such as fencing, landscaping, berming, and buffering treatments—are still "under consideration" and will be finalized after the public comment period, with details to be provided in a future findings or decision document. This approach does not satisfy the requirements of the Minnesota Environmental Policy Act. Under Minn. R. 4410, an EAW must evaluate environmental impacts as proposed, including reasonably foreseeable mitigation, so that decision-makers and the public can determine whether impacts may be significant. Mitigation measures cannot be deferred to a later stage and then relied upon to justify a negative declaration unless they are specific, enforceable, and evaluated during environmental review. The EAW defers mitigation for impacts that are central to the Project's environmental significance, including: •Operational noise impacts to nearby residences •Visual and aesthetic impacts to residential properties •Headlight glare and nighttime lighting impacts •Safety-related buffering for homes located in extreme proximity •Loss of privacy and residential usability	Most of the items mentioned by the commenter are not required in the environmental document. **Noise/Safety** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and identified mitigation to screen adjacent homes from the roadway. Berming, trees and fencing options were presented at the open house and noted in the EAW to have a better understanding of what residents prefer. Based on feedback, berming and landscaping/trees will be incorporated into the project as noted in the Findings of Fact and Conclusions. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. The measures included also improve safety associated with the project. **Lighting** As noted in the FOFC, lighting will be limited to roundabout intersections and it will include a warmer led to reduce the harshness of the light and will include backing that will direct light to the roadway and not into adjacent development. **Visual** There is a full visual impact analysis provided in Attachment J.
71					Because these mitigation measures are undefined and unevaluated, the EAW does not allow the public to understand: •Whether mitigation would meaningfully reduce impacts •Whether mitigation is physically feasible given site constraints •Whether impacts would remain significant even with mitigation •Whether mitigation would be enforceable or permanent Minnesota law does not allow an EAW to rely on vague or speculative future mitigation to support a conclusion that environmental impacts will not be significant. Deferring mitigation until after environmental review prevents meaningful public participation and undermines MEPA's purpose of informed decision-making. This deficiency is particularly significant where, as here, residences are located approximately 17 feet from the proposed roadway, and mitigation measures are the primary means by which severe impacts might be reduced. Without evaluating those measures now, the Responsible Government Unit cannot lawfully conclude that impacts will not be significant. Because the EAW relies on deferred and undefined mitigation to address potentially significant impacts, it lacks the information necessary to support a negative declaration. Accordingly, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410.	**Proximity of Homes** Please see response to Comment 71 regarding proximity of homes. Most of the items mentioned by the commenter are not required in the environmental document. **EIS** The county board will determine whether there is a need for an EIS under MEPA.
72	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing deficiencies in the EAW's cumulative effects analysis. The Minnesota Environmental Policy Act requires that an EAW evaluate cumulative potential effects, defined as the incremental impacts of a project combined with other past, present, and reasonably foreseeable future actions. This requirement applies regardless of whether those actions are undertaken by the same or different entities. Under Minn. R. 4410, cumulative effects must be evaluated where there is a basis of expectation for future development or related projects that may interact with the proposed action. While the EAW acknowledges that future residential, mixed-use, commercial, and institutional development is planned along the corridor, it fails to meaningfully analyze how those foreseeable developments will compound environmental impacts to existing residences, particularly those located in extreme proximity to the proposed roadway. The EAW does not evaluate cumulative impacts related to: •Increases in traffic volume, speed, and heavy vehicle use associated with planned growth •Long-term increases in operational noise exposure •Long-term increases in near-roadway air pollution and human health risks •Increased frequency and duration of safety risks to adjacent residences •Secondary roadway expansions or operational changes enabled by the Project	Section 21 of the EAW discusses cumulative impacts that could occur in the future. The timeline for cumulative effects is reasonably foreseeable actions. **Traffic Volumes** The proposed roadway is expected to have traffic volumes approaching less than 3,500 vehicles a day 20 years in the future See Section 20 in the EAW and Attachment K in the EAW that explain future traffic impacts. Roadway capacity of a two-lane roadway is approximately 10,000 vehicles for urban roadways. The traffic volumes would suggest that for a foreseeable future, the proposed roadway design should be adequate. This growth in traffic is based upon existing and planned development. See responses to Comments 103, 104, 92, 93, The project includes roundabouts at intersections where existing development is present thus helping to address safety and speed, which should eliminate the need for changes in traffic control for the foreseeable future. Additionally, the project includes multimodal accommodations (trail, roundabouts) to address nonmotorized user needs for the foreseeable future. **Noise** The project is exempt from state noise standards as it is owned by a county and is not fully access controlled. As noted in other responses to comments, the county did take noise into consideration and took efforts to reduce the roadway footprint, provide additional buffer space, slow travel speeds, provide berming, landscaping, and other mitigation. **Air Pollution** As noted in Section 17 - the air pollution does take into account foreseeable changes in vehicle mix and that air quality with regard to transportation shall improve over the long-term. Because future volumes are well below the capacity of the roadway (3,500 expected traffic and a roadway capacity of 10,000) indicates there is not congestion. Therefore, there would not be an expected concern in air quality.

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72					Instead, the EAW characterizes future development impacts as uncertain and defers their evaluation to future planning processes. This approach does not satisfy MEPA, which requires analysis of reasonably foreseeable development where adopted comprehensive plans and official policies establish a basis of expectation. By limiting its analysis to the standalone impacts of the roadway while deferring growth-related effects, the EAW improperly segments the Project from its foreseeable consequences. This segmentation prevents an accurate assessment of environmental significance and undermines meaningful public review. This deficiency is particularly consequential for residences located approximately 17 feet from the proposed roadway, where incremental increases in traffic, noise, and emissions over time may convert already substantial impacts into significant environmental effects. Because the EAW fails to integrate foreseeable development and growth-related impacts into its cumulative effects analysis, it does not provide the information necessary to support a negative declaration. Accordingly, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410.	**Human Health Risks** This is not a part of the MEPA review. **Safety** This is not a part of the MEPA review. However, the county incorporated several safety measures as previously noted. Lower design speed of 40 mph, two-lane roadway, roundabouts, trails, shifting the roadway within identified right of way to the east, and incorporating a smaller design footprint near more developed areas and incorporating berming and treeing between the roadway and developed areas. **Secondary Roadway Expansion** Roadways near the project area are not congested and not expected to be due to their more neighborhood focus - as noted in the purpose and need, there are not other north-south routes today that serve through trips. **Proximity to homes** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway. **EIS** The county board will determine whether an EIS is needed under MEPA.
73	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing evidence within the EAW that the Project's alignment was functionally predetermined prior to completion of environmental review and that reasonable alternatives were not meaningfully considered. Under the Minnesota Environmental Policy Act, environmental review must inform governmental decisions, not be used to justify decisions that have effectively already been made. An EAW must provide sufficient information to allow meaningful consideration of alternatives and avoidance of environmental impacts before a preferred outcome is selected. Under Minn. R. 4410, an Environmental Assessment Worksheet must disclose whether a project may have significant environmental effects and must not foreclose reasonable alternatives through premature commitment to a specific alignment. The EAW contains multiple indicators of predetermination, including: •Repeated references to the East Side Corridor alignment as having been officially planned, preserved, or maintained for a future roadway for decades •Evaluation of only a single roadway alignment in detail, without meaningful analysis of alternative corridors, alignment shifts, or increased setbacks from existing residences •A purpose-and-need narrative framed so narrowly that only the selected alignment can satisfy it •Advanced right-of-way planning and quantified property acquisition that indicate commitment to a specific alignment •Reliance on mitigation measures to accommodate impacts to nearby residences rather than evaluating avoidance alternatives These factors demonstrate that the alignment is treated as fixed, rather than subject to evaluation through environmental review. This approach undermines MEPA's requirement that environmental consequences be disclosed and considered before a decision is made. The lack of meaningful alternatives analysis is particularly problematic given that residences are located approximately 17 feet from the proposed roadway, where severe site-specific impacts are foreseeable. MEPA requires that avoidance of environmental impacts be considered before reliance on mitigation. Here, avoidance options were not studied because the alignment was treated as predetermined. By structuring the EAW to confirm an already-selected alignment rather than to evaluate whether that alignment—or reasonable alternatives—would avoid or reduce significant environmental effects, the EAW fails to meet the informational requirements of Minn. R. 4410. Because the Project demonstrates functional predetermination and fails to meaningfully evaluate reasonable alternatives or avoidance measures, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS).	**Alignment Predetermined Prior to Completion of Environmental Review and Alternatives Not Considered** The county is not required to complete an alternatives analysis under MEPA for an EAW. The proposer is required to identify the purpose and need and to define the project. The county complied with these requirements. Then the project was evaluated based on the impacts it would impose, again, consistent with MEPA. **Minn 4410 - EAW** Information about alternatives t is not accurate. See response above. The EAW does disclose the environmental consequences of the proposed action in Sections 7 through 21 and the attached appendices. **Proximity to homes** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway. **Avoidance** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required. **EIS** The county board will determine whether there is a need for an EIS under MEPA.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
74	12/19/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N Oak Ave, Apt 306, Owatonna, MN 55060	I am submitting this comment regarding the Environmental Assessment Worksheet (EAW) for the Owatonna East Side Corridor (29th Avenue Corridor) Project, specifically addressing fundamental deficiencies in the Project's stated Purpose and Need and the resulting improper elimination of reasonable alternatives. Under the Minnesota Environmental Policy Act, an EAW must accurately describe the problem a project is intended to solve and provide sufficient information to determine whether the proposed action may cause significant environmental effects. Purpose and Need is not merely descriptive; it governs the scope of alternatives considered and whether avoidance of environmental impacts is required. Under Minn. R. 4410, environmental review must be based on current conditions and reasonably foreseeable circumstances, not outdated assumptions. Failure of the Transportation Purpose The EAW relies heavily on downtown congestion relief, traffic redistribution, and travel-time savings as primary justifications for the Project. However, available traffic data prepared by the Project's own consultant, WSB, indicates that these conditions have materially changed. Traffic counts from 2019 to 2024 show reductions ranging from approximately 5 percent to as much as 30 percent at key downtown and corridor intersections, demonstrating that the congestion conditions cited in the EAW have already been substantially alleviated. The EAW does not reconcile these reductions with its stated purpose. In addition, when standard transportation modeling and mathematical formulations are applied—accounting for route length, posted speeds, intersection controls, and access points—the proposed corridor does not demonstrate meaningful travel-time savings for typical north–south trips. Despite this, the EAW assumes travel efficiency benefits without providing quantitative analysis demonstrating that such benefits exist. MEPA does not allow environmental review to rely on assumed or outdated benefits, particularly where those assumptions are used to justify significant environmental and residential impacts. Development-Driven Purpose and Premature Elimination of Alternatives When unsupported traffic relief and travel-time justifications are removed, the remaining rationale for the Project aligns primarily with facilitating future mixed-use, commercial, and institutional development identified along the corridor in adopted land-use plans. Viewed through this development lens, the predetermined corridor location and alignment make sense. However, this growth-accommodation purpose is not transparently disclosed or analyzed as such in the EAW. Instead, it is embedded within a transportation narrative that is not supported by current data.	**Traffic and Purpose and Need** Please see responses to Comments 92, 93, 96, 103, 104, 105, and 106 regarding traffic and purpose and need. **Proximity to homes** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway. **Alternatives** An alternatives analysis is not required for an EAW under MEPA. **EIS** The county board will determine whether an EIS is needed under MEPA
74					Because the Purpose and Need is framed to support a predetermined development corridor, alternatives that could better meet transportation objectives—such as alternative alignments, increased setbacks from residences, or other network improvements—were eliminated prematurely, before avoidance options were studied. This premature elimination prevented meaningful evaluation of: •Alignments that would avoid residences located approximately 17 feet from the roadway •Design options that could meet transportation needs without imposing severe impacts on existing neighborhoods •Solutions better aligned with current traffic conditions rather than outdated assumptions Requirement for an EIS By relying on outdated traffic conditions, assuming unproven travel-time benefits, and framing Purpose and Need in a manner that only the selected corridor can satisfy, the EAW functions to justify a preselected outcome rather than to inform a decision. These deficiencies prevent meaningful consideration of alternatives and preclude a lawful determination that the Project will not have significant environmental effects. Accordingly, the Responsible Government Unit must require preparation of an Environmental Impact Statement (EIS) pursuant to Minn. R. 4410, including reassessment of Purpose and Need based on current data and full evaluation of reasonable alternatives and avoidance measures.	
75	12/20/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	I am submitting the East Side Corridor consultant Request for Proposals (RFP) materials, including proposal language and scope commitments, for inclusion in the Environmental Assessment Worksheet (EAW) record. These materials are relevant to evaluating the environmental review process, including the sequencing of studies, public involvement commitments, anticipated environmental documentation, and the basis for identifying a preferred alternative. Please confirm that these documents have been added to the official EAW record for consideration prior to any determination.	**Consultant Selection Occurred Before Public Disclosure and Shaped Environmental Review** Comment noted. **Procurement Materials Were not Publicly Disclosed** Comment noted. Not required for MEPA. The proposal and RFP do not stand in place of required environmental review. They are put together so that both parties have an understanding of the work that will be required to develop a project. The 18th St roundabout was a project in process. It had its own need and independent utility - the new project (east side corridor/29th Ave) would need to include a changed condition west of its location at the intersection. **Consultant Scope Confirms Omitted Impacts** The railroad work was a separate project to address safety and congestion at the intersection of 18th St and Bixby Rd. It could be justified by itself to address an unrelated transportation need. Building the roundabout did not require the need for the east side corridor which is needed for north-south connectivity. The actions were not connected actions under NEPA. The decoupling included in the referenced email was with regard to the need for additional railroad infrastructure at the roundabout - it was not about environmental review. At the time, the county did not know if the east side corridor would be proceeding. **Relevancy** The conclusions in this comment are not logical. MEPA does not require an alternatives analysis. Every decision on a project does not have to go up for public review and comment. Under MEPA, public participation is not required until the official 30-day public comment period. As noted above, a RFP and scope of work do not dictate environmental review, rather they provide both entities with an understanding of the work that is likely needed and the potential processes that need to be followed. They do not substitute for formal environmental review and were not for the project.
76					No Comment Included in #76	
77	12/20/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Attached please find my formal EAW comment regarding the East Side Corridor, submitted as a single PDF. Please confirm receipt of this submission and that it will be included in the official EAW record. Thank you.	Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
78					No Comment Included in #78	
79	12/19/2025	Donald/Susan Mullenbach	dsmully@msn.com	2535 Mossy Creek	The East Side Corridor EAW does not include required noise and human health analysis. A referenced noise study reportedly indicates the need for a 20-foot noise wall, yet no feasible mitigation or right-of-way analysis is included. As of April 1, 2025, this project was declared a federal undertaking. These deficiencies meet the threshold for significant environmental effects and require a full Environmental Impact Statement. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Noise Study** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. Slowing of traffic speeds reduces noise. A noise wall is not being considered as it is not required under state standards. **Federal Undertaking** The project does not have federal funding see response to Comment 28 and Comments 248 and 249. **EIS** The county board will determine whether an EIS is needed under MEPA requirements. **FONSI** The county board will review the information and determine if a FONSI can be issued under MEPA requirements.
80	12/16/2025	City of Owatonna	mayor@ci.owatonna.mn.us	540 W Hills Cir, Owatonna, MN 55060	RESOLUTION NO. 88-25 RESOLUTION APPROVING MUNICIPAL SUPPORT FOR EAST SIDE CORRIDOR PROJECT WHEREAS, Steele County has, through its Capital Improvement Plan (CIP), recommended an expansion project on the east side of Owatonna, known as the East Side Corridor, to alleviate downtown congestion, improve vehicle safety and increase multimodal transportation; and WHEREAS, Steele County and the City have, through their separate and simultaneous 2040 Transportation Plans, recommended the addition of a north-south corridor on the east side of the Owatonna Municipal Boundary; and WHEREAS, Steele County, in consultation with the City, commenced the East Side Corridor Study to further develop the north-south route and subsequently engaged in an extensive Environmental review process conforming to Federal Highway Administration (FHWA) and Minnesota State Rules beginning in 2022 to identify and evaluate corridor locations; and WHEREAS, Steele County and the City, together with WSB, have engaged in community engagement as part of the study and preliminary design efforts intended to gather and consider public feedback for the proposed expansion; and WHEREAS, Steele County received concurrence in fall of 2024 on the preferred corridor, Alternative 3, which is consistent with the location of the Steele County officially mapped corridor and is approximately 2.2 miles east of CSAH 1/Cedar Avenue/CSAH 45, with deviations north of CSAH 19 (Rose Street) and south of CR 180; and WHEREAS, the project is consistent with the City's 2050 Comprehensive Plan; and WHEREAS, the project conforms to the orderly annexation agreement in place between the City and Owatonna Township; and WHEREAS, prior to advertising for contractor bids on the Project, Steele County will present the City with a Cooperative Agreement for the cost sharing of the improvements; and NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Owatonna supports the selected alternative, Alternative 3; and NOW, THEREFORE, BE IT FURTHER RESOLVED by the City Council of the City of Owatonna that the City of Owatonna supports the County continuing with the development of final plans and right-of-way acquisition necessary for the construction of the Project; and Passed and adopted this 16th day of December 2025, with the following vote: Aye_7_; No_0_; Absent _0_. Approved and signed this 16th day of December 2025.	Comment Noted
81	12/28/2025	Colin Whalen	cpwhalen71@gmail.com	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. Traffic conditions on neighborhood streets such as Shady Avenue have been cited as a justification for the proposed East Side Corridor. However, the EAW does not disclose any traffic counts, studies, or analyses demonstrating that Shady Avenue experiences congestion, unsafe conditions, or traffic volumes inconsistent with its residential function. The absence of traffic data is not incidental. It is consistent with residents' daily, lived experience using Shady Avenue, which does not reflect a traffic problem of regional or corridor-level significance. To document observed conditions, a resident recently compiled all trips made on Shady Avenue over a typical 24-hour period, including peak hours on a school day. Across multiple trips, only three vehicles were observed. These observations corroborate the lack of supporting data and directly contradict the assertion that Shady Avenue traffic necessitates construction of a $30–60 million regional roadway. Under MEPA, an Environmental Assessment Worksheet may not support a Finding of No Significant Impact when a project's purpose and need is based on disputed, incomplete, or unsupported assumptions, particularly where those assumptions are central to the scale and location of the proposed action. Here, the claimed traffic problem is a core justification for the project, yet it is unsupported by disclosed data and contradicted by real-world conditions. This unresolved discrepancy creates substantial uncertainty regarding the project's necessity, scale, and location, and undermines the EAW's ability to meaningfully evaluate environmental impacts, alternatives, and mitigation. Such uncertainty cannot be resolved through an EAW and requires preparation of a full Environmental Impact Statement (EIS) to ensure informed decision-making, public transparency, and compliance with MEPA.	This comment is conflating two different groups of streets noted in the EAW – the segments that have potential for congestion per the 2040 Transportation Plan, and the residential streets that likely attract some cut-through traffic. Shady Ave is one of the latter – it is not identified as one of the segments with potential congestion. There is no "assertion that Shady Avenue traffic necessitates construction of a $30–60 million regional roadway." The benefit that ESC would have for city streets like Shady Ave has more to do with safety benefits by reducing conflicts, including those with pedestrians and bicyclists.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
82	12/28/2025	Colin Whalen	cpwhalen71@gmail.com	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The EAW relies heavily on the assertion that the East Side Corridor has been a “preserved” or “planned” corridor for approximately three decades. That assertion is not supported by the public record and results in an inaccurate environmental baseline that undermines the adequacy of the EAW. The record demonstrates that while discussions and agreements to preserve an east side beltline occurred at various points, those agreements were never executed. The corridor was never purchased, no right-of-way was acquired, no deed restrictions or designations were recorded, and development was approved multiple times directly over the mapped route. The City did not refuse permits, contest development, or otherwise act to preserve the corridor. Most notably, in 2013 the Owatonna City Council voted to declassify the East Side Beltline and reclaimed state aid funding for the project, explicitly acknowledging that the corridor was no longer anticipated to be built. This constitutes affirmative abandonment, not preservation. Despite this history, the EAW treats the corridor as an established planning constraint and uses it as a baseline justification for locating a new highway immediately adjacent to existing homes. Reliance on a corridor that was functionally abandoned through governmental action misrepresents existing conditions, prejudices alternatives analysis, and improperly narrows the scope of environmental review. Because the EAW’s Purpose and Need, alternatives screening, and impact analysis are premised on an inaccurate and unsupported “preserved corridor” narrative, the EAW fails to provide a reliable foundation for environmental decision-making. This defect cannot be cured through clarification or supplemental explanation and warrants heightened environmental review. Thank you for including this comment in the official EAW record.	**Preserved Corridor** Please see response to Comment 86. **Alternatives Analysis** An EAW does not require an alternatives analysis under MEPA. The RGU is required to state the need for the project, to describe the project and then address impacts associated with the project. Section 6 of the EAW identifies the need for the project and describes it. Sections 7 - 21 address impacts associated with it.
83	12/28/2025	Colin Whalen	cpwhalen71@gmail.com	NA	I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. I am concerned that the environmental review process has been prejudiced by governmental actions taken before environmental review is complete. On December 16, 2025, the City of Owatonna adopted a Resolution of Support for the East Side Corridor prior to completion of environmental review and while key impact information remains unavailable to the public. The resolution commits the City to support and advance the project, including continued development and right-of-way considerations, before the EAW process has concluded. This action signals a predetermined outcome and undermines the purpose of environmental review, which is intended to inform decisions—not follow them. Public comment on the resolution occurred after the vote, preventing residents from raising these concerns before action was taken. Written notice identifying these process concerns was submitted to the City prior to the vote and entered into the public record, yet the City proceeded anyway. Advancing formal project support prior to completion of environmental review prejudices the decision-making process and compromises the integrity of the EAW. Because project decisions are being made before environmental review is complete, a Finding of No Significant Impact (FONSI) would be improper. An Environmental Impact Statement (EIS) is required to restore a lawful and unbiased review process, or at a minimum, the EAW must be supplemented to address the effects of pre-decision commitments and to ensure that alternatives and impacts are evaluated without predetermination.	**Resolution** Other governmental agencies that are not the RGU are allowed to provide comment and input on their preferences for alternatives/support for a project. The city of Owatonna chose to submit a resolution in support of the project. **FONSI** The city of Owatonna is not the RGU. The conclusion is not accurate **EIS** The county board will determine whether an EIS is needed under MEPA requirements.
84	12/28/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com	NA	Please accept the attached PDF as a formal written comment submitted on behalf of Owatonna East Side Corridor Residents for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. Please confirm receipt and that this comment has been included in the official EAW record. Thank you.	**Response to County Request to Select Among Three Noise Options** **Purpose of This Comment** The project does not have federal funding and is not a federal undertaking. See response to Comment 28 and Comments 248 and 249. It is not subject to NEPA or federal Noise Studies. Under MEPA, the project is exempt from state noise standards. The county did consider changes with the roadway being near existing development. Please see response to Comment 85. **None of the Three Options Presented Constitutes Noise Mitigation** Comment noted. See above regarding NEPA and MEPA. The county did identify some additional efforts to help screen the roadway from homes and to provide some mitigation. Those are the items noted in the comment. **Claimed Exemptions do not Relieve the County of its Duty to Address Noise Impacts** See above, the county did consider noise impacts. **Substantial Noise Impacts are Documented** Referenced study was completed under NEPA, which is different than MEPA. Project is required to address impacts under MEPA. **Noise Study Identifies Mitigation Equivalent to a 20-Foot Noise Wall** See response above. **The Project Remains a Federal Undertaking** See response above.

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84						**Avoidance Must Be Considered before Residents are Asked to Choose Mitigation** See response above, the project is not a federal undertaking. Avoidance is not required. Collapse of the purpose and need is the commentors opinion. **Conditional Response to the County's Request** See response to Comment 195. Deer Trail Berm Comparison The reference to the berm along Deer Trail Drive was provided to give context to what the berm could look like. It was not indicating they were developed in the same way. **Significant Impacts Preclude a FONSI** See responses above. The project is under MEPA, not NEPA. NEPA required studies are not applicable. As noted above, the project is exempt from state noise standards as the roadway is not a fully controlled access facility and it is owned by a county. The county did consider the change with a roadway near development as part of the project development. In addition to the features mentioned in the comment, the county also took measures to slow speed on the roadway to lessen noise impacts. This included reducing the design speed, incorporating at roundabouts, using an urban design near developed areas and shifting the roadway to the east in areas with urban design to provide better separation between homes and the proposed roadway. **Conclusion** See responses above. The county board will determine whether an EIS is needed under MEPA.
85	12/28/2025	Jeanne Pichner	jeannep193@gmail.com	1818 SE 24th Ave, Owatonna, MN 55060	I'm writing today to voice my concerns regarding the East Side Corridor Project and the Environmental Assessment Worksheet (EAW). I understand that a north-south roadway on the east side of Owatonna has been thought about for many, many years. The original intent or purpose was to construct a direct roadway on the east side of Owatonna from the north to south. As I read through the EAW (Environmental Assessment Worksheet) I noted some things: 1. Primary Need: Vehicle Mobility – Poor Connectivity" - which was the ORIGINAL INTENT LONG AGO! 2. Secondary Need: Walkability/Bikeability - This was never in the ORIGINAL PLAN many years ago, but ADDED by who??? Where is the data that supports adding a multi-use trail? Is this a NEED or a WANT? However, now it's turned into a more complex project by adding a multi-trail system with curb & gutter, storm sewer and also four (4) roundabouts. 3. For the residents living by Countryview Park (north of Turtle Creek Nursery), the traffic noise impact of this project was not appropriately addressed in the EAW. There are Noise Laws that exist. Once a roadway is built too close to homes, noise impacts are no longer avoidable - only managed after the fact. No road has ever been built this close to homes in all of Steele County history. I believe an Environmental Impact Statement (EIS) is necessary to properly evaluate noise impacts to this project. Additional comments to this project: • There is already an existing road (34th Ave) that is approx 1 mile east. Even though it does not extend the entire length of the city, why construct more roads? There has got to be a better route to avoid cutting up several parcels of prime farm land. Farming is our family business and has been in the Pichner family for 5 generations now. Cutting up our farm land puts a burden on us. We are concerned the 2 ponds that are proposed on our land would damage our drainage system in the field, and dramatically lessen our crop yields. • The City Engineer roughly figured the cost of adding curb & gutter to the roadway would be approximately $1.3M, that doesn't include the storm sewer system, which is required for curb & gutter. To lower the cost of this project let's stick to the PRIMARY NEED - Vehicle Mobility! NOT, the Secondary Need – a multi-use trail! • I feel that adding 4-roundabouts is a safety issue for pedestrians who want to cross them. I do not understand the need for that many roundabouts? Again, costing more money. Please also take into consideration the ORIGINAL INTENT of this project - to build a roadway. NOT, trails, curb & gutters, roundabouts, storm sewer systems, etc. Move it further EAST to alleviate building more roads and affecting residents along the Countryside Parkway. I would like to request a full Environmental Impact Statement (EIS) with independent oversight and an independent Responsible Government Unit (RGU).	**Comments 1 and 2:** Comments noted. The project identified needs for the current project, not past studies or projects. **Comment 3:** The project is exempt from state noise standards as the proposed roadway is not a fully controlled access facility. The county did take into account changes next to existing development and has made changes in design to slow traffic which will lessen noise impacts. These include: 40 mile per hour design speed which is considered low speed, incorporation of roundabouts at intersections near developed areas, using an urban design in developed areas, and shifting traffic within identified right of way to the east to provide greater separation between the roadway and developed areas where right of way was more limited. The county board will determine whether an EIS is needed under MEPA requirements. **Additional Comments** 34th - Comment noted. Cost - Comment noted. Roundabouts - Comment noted. Roundabouts are the safest traffic control for pedestrians and bicyclists. They only have to cross one lane of traffic at a time and it requires all traffic to slow. Original Intent - see response above regarding comments 1 and 2 EIS - see above response.
86	12/28/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the contradiction between the claimed “preserved corridor” and the City’s prior determination that the project was not foreseeable for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Finding - The Claimed Preserved Corridor is Contradicted by an Affirmative Governmental Determination that the Project Was not Foreseeable** The EAW does not rely on a persevered corridor to determine the purpose and need for the project. The county clearly demonstrates the need for the project in Section 6 of the EAW which indicates lack of north-south routes and the transportation problem that creates. Under MEPA, the project proposer is allowed to define the project in the EAW. An alternatives analysis is not needed. **Implications for Environmental Review** See responses to comments above.

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87	12/28/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding delayed notice of the EAW and denial of access to project data during the public comment period for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Failure to Incorporate Federal Undertaking Requirements Renders the EAW Incomplete and Misleading** Please note the title on this comment does not match the comment **Previous Requests of Project Updates and Notifications** The county did not receive a request for the EAW from the commentor. See response to comment 236. The EAW was posted to the EQB as required. It was published on November 18, 2025. The EQB posting included information on where the documents were available, which was the project website and provided a link to the website. The EAW was put on the project website the day the notice was published in the EQB. The EQB posting included information on the public meeting date and location. As required, a legal notice was published to the local paper which included information on the availability of the documents and included information on the public meeting. There was an error on the comment end date in the original publication to the EQB, as the county was extending the public comment period beyond the required 30 days to due to the upcoming holiday (Thanksgiving). A second notice was published to the EQB the following week showing the extended comment period to end on December 31. Data needed to support the EAW is included in the document text and attachments in accordance with MEPA.
88	12/24/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached comment submitted for the Environmental Assessment Worksheet (EAW) for the East Side Corridor project. This comment is intended to preserve procedural and substantive concerns regarding the adequacy of the EAW and the need for further environmental review. Please confirm receipt of this submission and include it in the official project record. Thank you for your time and attention.	**Procedural Restart History Demonstrates Predetermination and Inadequate Environmental Review** **Initial EAW and Unacknowledged Substantial Changes** Comment noted. This was for a different analysis undertaken several years ago and is not associated with current efforts. **Shift to a Programmatic Categorical Exclusion** An EAW has always been required for the proposed project. At one point there was federal funding for the project. The federal highway administration determines the document type. When federal funding when away, federal documentation and processes were no longer required. **Preferred Alternatives without Supporting Analysis and Narrative Reframing** Development of an EAW under MEPA does not require an alternatives analysis. The EAW includes information on the project purpose and need and is clearly documented in Section 6 of the EAW. See above regarding FHWA determination of document type and funding removal. **Repeated Restarts Without Corrective Substantive Analysis** Information in the EAW addresses topics and includes information on studies for MEPA requirements. Federal reviews and processes are not required under MEPA **Conclusion** Conclusion is inaccurate and does not reflect MEPA requirements. **EIS** - the county board will determine whether an EIS is needed under MEPA.
89	12/27/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding failure to incorporate federal undertaking requirements into the Environmental Assessment Worksheet for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Failure to Incorporate Federal Undertaking Requirements Renders the EAW Incomplete and Misleading** Please see response to Comments 97 and 107. **Federal Undertaking Determination Triggered federal Compliance Obligations** See response above. **Required Federal Analyses are Missing from the EAW** See responses above. **Failure to Analyze Railroad Crossing and Grade Separated Structure** The project does not include a grade separation of the railroad. It is an at-grade crossing with arms and gates.
89						**Improper Minimization of Impacts Through Funding Recharacterization** See responses above. **Incomplete Federal Environmental Record Following Non-Programmatic Categorical Exclusion** See responses above. A CATEX was not completed as there was no federal funding on the project. **Fatal Defect** See responses above. **Requested Action** See responses above.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
90	12/21/2025	Kelsey Buchardt	kesbuchardt@gmail.com	2450 Briarwood Place NE	I would like everyone who reads this to think about if this was their backyard, family and neighborhood. It is so silly that this road, that will be between 45 and 55 mph is being built so close to people's homes and backyards. I understand that we need a North South road and support it, but can it please just move over 500 to a 1000 feet? Can a proper EIS be done and presented. Just because the township has an ordinance, that was made before the studies were done, can't a compromise be found. I was told at the open house that 34th Ave will be developed eventually by Renee. Why don't we do that now instead of paying for it twice. Than you can develop the land between 34th and the neighborhood for residential growth. If 34th is made the road, then the city can control how close new homes are put to the road that already exists. Putting a fast road this close to already existing homes is unsafe, irresponsible, and honestly just mean. Please move the road east!	Comments noted. The proposed roadway is anticipated to be posted at 40 miles per hour and will include roundabouts at multiple intersections. The roundabouts will help to slow traffic. **EIS** The county board will determine if there is a need for an EIS under MEPA requirements. **34th** It is possible that 34th could be needed in the future if/when development extends that far. That option does not address current needs and there are no programmed projects on this route.
91	12/21/2025	Tyler Buchardt	seeingdublin@gmail.com	2450 Briarwood Place NE	Please move the road further to the east. There's no reason for it to be this close to people's backyards (or in them for that matter). Also, the roundabouts will cause semis to be constantly jake breaking, which will be loud. Could you also provide an EIS?	Comments noted. EIS - the county board will determine the need for an EIS under MEPA requirements.
92	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding improper land-use assumptions in the traffic analysis based on an annexation map for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Improper Land Use Assumptions Based on Annexation Map** Although the orderly annexation agreement does not define or approve specific developments, the map it contains was one of the tools for estimating the land area (geographic space) likely to develop in the future. The forecast assumed the area labeled C1 on the orderly annexation map would develop by 2046. The other undeveloped areas on the map are not assumed to generate any traffic before 2046 and do not factor into the ESC traffic forecast. Per the orderly annexation agreement, this area has a “largely residential development potential”. Adjacent areas within the city limits are zoned R-1, Single Family Residential, so that is what was assumed for the additional future development. Development density was estimated based on the land area and number of units in the existing North Country development.
93	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding internally inconsistent and unexplained traffic projections for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Internally Inconsistent and Unexplained Traffic Projections** There is no existing roadway with count data to serve as a baseline, and no travel demand model is available. Variation in volume along the corridor corresponds to locations where development is likely to occur. For example, the segment between 26th Street NE and Dane Rd has the lowest forecast volume because there is no assumed development adjacent to that segment. All assumed development is farther south, and there are few destinations to the north. The segments at Rose Street have slightly higher volume than other segments in the 2046 forecast because more development, including the elementary school, is expected to occur in that area.
94	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding a factually incorrect claim regarding CSAH 43’s connection to US 14 in project materials for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	Please see response to Comment 236.
95	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding misleading “official mapping” claims that overstate legal effect and rely on an abandoned corridor for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Official Mapping Claims on the Website Overstate Legal Effect and Mislead the Public** Comment noted. The project website is not the EAW and included information on all the studies and actions that have been undertaken to study multiple transportation projects on the east side of Owatonna, which have differing purposes. The intent was to provide clarity on the studies and their context. The county identified a need for the project and documented it in Section 6 of the EAW. It did not rely on the use of the Official Map as the reason for the need for the project.
96	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the lack of complete baseline AADT data in the traffic analysis for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Incomplete Existing Conditions - Missing Baseline AADT** The baseline condition was the MnDOT AADT map current at the time of the forecast. Existing daily volumes on existing roadway segments intersecting with the East Side Corridor are shown on the layout attached to the forecast memo. Existing daily volumes on other existing roadway segments from which some traffic would be anticipated to shift to the East Side Corridor is shown in Figure 9 of the traffic analysis memo. Existing local roadways for which MnDOT does not collect or report AADT data generally carry lower volumes of traffic. Traffic volumes on these roadways are assumed to be well below capacity, and these roadways are not expected to contribute additional traffic to the East Side Corridor beyond what is already reflected in the analysis. Typically, more recent existing traffic data is preferred. However, in this case, 2019 being the most recent year with data available is not necessarily a deficiency, as it represents the latest pre-pandemic condition.

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97	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding missing referenced cultural resource and project documents relied upon in the Environmental Assessment Worksheet for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Missing Referenced Cultural Resources and Project Documents - Incomplete EAW Record** Please note, the project is not a federal undertaking and federal review is no longer required. See response to Comment 28 and Comments 248 and 249. The federal analyses are not required. Please note - it is also standard practices to not include specific site information on cultural resources in public facing documents due to their potential destruction. Information from the federal analysis was shared with the Office of the State Archaeologist and the Minnesota Indian Affairs Council for their use and review of the project as indicated in the EAW.
98	12/28/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding inadequate noise mitigation, continued federal noise obligations, and associated safety impacts for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	Please see response to comment 195.
99	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding predetermination through improper reliance on the Imagine Owatonna 2050 Comprehensive Plan for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Predetermination Through Improper Reliance on the Imagine Owatonna 2050** Preparation of an EAW under MEPA does not require an alternatives analysis. Consistency with long-term plans was included to provide context that the city had studied transportation as part of its planning duties and had identified a transportation corridor in this area. There is nothing wrong with good planning for both land use and transportation facilities. Furthermore, the EAW documents the need for the project, these transportation problems exist today and are expected to worsen as the community continues to grow and develop. The project does not have federal funding and is not subject to NEPA. **Legal Status and Limits of the Imagine Owatonna 2050 Comprehensive Plan** The comprehensive plan was not treated as an official map. Information from the plan was used in the development of the EAW in terms of answering questions regarding land use and consistency with adopted plans in Section 10 (land use). MEPA does not require alternatives to remain genuinely open until environmental review. An EAW under MEPA does not require an alternatives analysis as noted above. It also does not require public participation during project development. Please see response to Comment 109. **EIS** The county will determine if an EIS is needed under MEPA requirements.
100	12/23/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal public comment on the East Side Corridor Environmental Assessment Worksheet. Attached: EAW Comment – Predetermination and Improper Sequencing Affecting Environmental Review Submitted by: Melissa Zimmerman, directly impacted resident This comment addresses procedural deficiencies, including predetermination of the preferred alignment, improper sequencing of environmental review, and denial of meaningful public participation, and is intended for inclusion in the official EAW record. Please confirm receipt of this submission and confirm that the attached comment will be included in the administrative record for this project.	**Predetermination and Improper Sequencing Affecting Environmental Review** The project does not have federal funding and is not subject to federal studies and evaluations. Preparation of an EAW under MEPA does not require an alternatives analysis. It does require the documenting impacts associated with the project under state rules and determining whether there is a potential for significant impacts under state rules. An alternatives analysis was not required for the project. Likewise, MEPA does not require public input during project development. An opportunity for public input is required once the EAW is published. Which has occurred. The county also provided multiple opportunities for the public to participate at open house meetings, stakeholder meetings, individual property owner meetings, and comments at county board meetings.
101	12/23/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal public comment on the East Side Corridor Environmental Assessment Worksheet. Attached: EAW Comment #8 – Procedural Irregularities, Engineer Oversight Gaps, and Professional Responsibility Concerns Submitted by: Melissa Zimmerman, directly impacted resident This comment documents procedural irregularities affecting the preparation and execution of the EAW, including the absence of a County Engineer during critical project advancement, limitations on interim engineer review, and professional responsibility concerns related to EAW execution. This submission is intended for inclusion in the official EAW administrative record. Please confirm receipt of this submission and confirm that the attached comment will be included in the administrative record for this project.	Please see response to Comment 201.
102	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the unavailability of the project website and its impact on public awareness and participation for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Website Unviability, Project Inactivity, and Timing of Public Comment Period** MEPA does not require public input during the project development process. It requires a 30-day public comment period once the EAW is completed and posted to the EQB. The county completed those requirements. It also provided multiple opportunities to provide input at open house meetings, stakeholder meetings, and city council and board meetings. The website was active during those months which is evident from site diagnostics. Furthermore, the project team was never notified by anyone that there were issues accessing the site, which an effort to troubleshoot individual's problems could have been rectified.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
103	12/28/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the collapse of the project's stated purpose and need due to lack of a demonstrated transportation problem for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Lack of a Demonstrated Transportation Problem** **Current Traffic Data Undermines the Claimed Transportation Need** Posted AADTs are derived from short term duration counts and seasonal adjustment factors. This process for developing AADTs can lead to fluctuations in values from year to year. The projected AADTs in the 2040 Transportation Plan take into consideration future development plans and account for long-term growth. **Alleged Poor Connectivity Is Not Supported** The efficiency of the generally radial existing roadway network centered on downtown will decrease in the future as the developed area of the city expands to the east and as major traffic generators such as the new high school are built farther away from downtown. As this pattern of development progresses, the historic downtown will become relatively less significant as a regional destination. The traffic analysis does indicate the East Side Corridor will reduce travel times for certain north-south trips on the east side of the city, which will lead to traffic shifting away from existing routes that are less direct. Although alternative alignments farther east may technically fit within spacing guidelines, those alignments would provide less travel time savings.
103						**Downtown Congestion Is Unsupported and Methodologically Inflated** The reference to the volumes at the intersection of Mineral Springs Road and Bigelow Avenue establishes a maximum possible traffic diversion and does not represent a forecast of the diversion that would actually occur. This calculation assumes that all traffic from the north and east legs of the intersection goes to and from the west (i.e. there are no westbound right turns or southbound left turns), so there was no double counting of vehicles. Posted AADTs are derived from short term duration counts and seasonal adjustment factors. This process for developing AADTs can lead to fluctuations in values from year to year. The projected AADTs in the 2040 Transportation Plan take into consideration future development plans and account for long-term growth. In the absence of a travel demand model, travel times for sample trips were estimated using Google Maps for the fastest existing route. It is possible that drivers familiar with the area prefer a different route, and the assumed existing route for Trip #2 in the analysis from the North Country neighborhood to the high school does not travel through downtown. The analysis did not estimate the volume of traffic making each trip, but it is apparent from the nature of the development that there is at least some demand for travel between these or similar origin-destination pairs. **Residential Street Traffic Claims Are Unsupported by Data** The statement in the EAW about "considerable through traffic" using the residential streets is based on information from agency staff and public comments. The reference in the EAW to the potential for this to occur on Country View Ave is contingent on anticipated connections that would make it a through street. **Claimed Travel Time Benefits Are Based on Unsupported Assumptions** Alternative 4 is less direct than Alternatives 1-3 for all trips analyzed. At this stage of project development, there is no basis for assuming that operating speed on the new alignment would vary by alternative, so the additional distance would require additional travel time. Furthermore, Preparation of an EAW does not require an alternatives analysis under MEPA. The county is allowed to define the project and does not need to consider other alternatives.
103						**Development Considerations Cannot Supply a Transportation Purpose and Need** The East Side Corridor will improve the capacity of the roadway network to accommodate traffic related to existing land uses and potential future developments that could occur with or without the new roadway. Enabling development is not the purpose of the project, and lack of development is not among the needs. **Inaccurate Capacity Claims in EAW Tables** The traffic analysis used the volume data that was current at the time the analysis was done. Posted AADTs are derived from short term duration counts and seasonal adjustment factors. This process for developing AADTs can lead to fluctuations in values from year to year. The projected AADTs in the 2040 Transportation Plan take into consideration future development plans and account for long-term growth. The North Street segment should be labeled "North Street W" (not E). In any case, the East Side Corridor would not affect traffic on North Street. The discrepancy in traffic volumes on CSAH 8 (Kenyon Rd) stems from the point location of the count. MnDOT's map assigned the higher number to the whole segment between 24th Avenue and 44th Avenue, but the lower number is likely more accurate for the location where the proposed East Side Corridor alignment would intersect. The higher number reported in Table 3 of the EAW does not affect any conclusions. **Updated Traffic Projections Contradict EAW Conclusions** The congestion analysis from the 2040 Transportation Plan was current at the time the traffic analysis for this project was done. The East Side Corridor would increase traffic on 18th Street between the new north-south alignment and Bixby Road. It would not be likely to affect the segment of 18th Street with potential congestion identified in the 2040 Transportation Plan. **Alternatives Analysis and Premature Elimination** Although alternatives 2, 3, and 4 would have equivalent impacts on the segments identified as potentially congested in the 2040 Transportation Plan, Alternative 4 would be longer in both distance and travel time for the analyzed trips.Preparation of an EAW does not require an alternatives analysis under MEPA.

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104	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the use of speculative school siting as a traffic input for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Speculative School Siting Used as Traffic Input** The school was included in the traffic analysis based on planned land uses to account for trips generated by a school rather than low density residential uses. It will generate more trips than low density uses and was included to provide a conservative (higher) traffic potential for the future. Future traffic volumes are based on future land uses and development/redevelopment. This is standard traffic engineering practice for traffic studies. **Failure to Evaluate Safety, Noise, Air Quality and Pedestrian Impacts With a School** The EAW is not required to study items specific to a school. The EAW does evaluate information regarding air quality and noise. The project took safety into consideration by including roundabouts (which are better for non-motorized users) and including a low design speed for the route.
105	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the absence of a travel demand model in the project's traffic analysis for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Inadequate Traffic Methodology - No Travel demand Model** A travel demand model was not required to be developed. Traffic volumes were developed using standard traffic engineering practices.
106	12/26/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding unverifiable traffic estimates based on undisclosed ITE trip generation assumptions for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Unverifiable Traffic Estimates** The trip generation rate refers to the residential development, not the school. The way this is written in the forecast memo isn't completely clear. Single-Family Detached Housing: •Land use code: 210 •Independent variable: dwelling units •Assumed development size: 1264 total units in the areas labeled C1 on the map in the orderly annexation agreement •Trip rate: 9.43 trips per day •Directional distribution: 50% entering, 50% exiting The school is assumed to generally serve the future development area, so any school-related traffic using the East Side Corridor was assumed to be already counted in the trips generated by the residential development. No reduction for internal capture was applied to the trip generation rates, which is a conservative approach for such a large development area.
107	12/24/2025	Nicole Schulz	nrschulz@fedins.com	2535 Stony Creek Dr	The East Side Corridor EAW does not include required noise and human health analysis. A referenced noise study reportedly indicates the need for a 20-foot noise wall, yet no feasible mitigation or right-of-way analysis is included. As of April 1, 2025, this project was declared a federal undertaking. These deficiencies meet the threshold for significant environmental effects and require a full Environmental Impact Statement. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Noise** As stated in the EAW, the project is exempt from state noise standards. The county did consider the change in use next to developed areas within the project area and made changes in design (lower design speed of 40 miles per hour, incorporating roundabouts at intersections to slow travel speeds, using an urban design standard that narrows the roadway footprint near developed areas, and shifting the roadway to the east within identified right of way to provide greater separation between development and homes) to reduce the impact of noise. The county also considered berming, fencing and landscaping to provide screening between the roadway and development. **Federal Funding** The project does not have federal funding and is not considered a federal undertaking. Please see response to Comment 28 and Comments 248 and 249. Reference to federal undertaking was inadvertently left in the EAW Section 15 and its attachment and Section 9 regarding permits/reviews. This has been corrected in the FOFC. Federal noise studies and mitigation are not required under MEPA. **EIS and FONSI** The county board will determine if there is a need for an EIS under MEPA requirements and if a FONSI can be declared.
108	12/28/2025	Brady Beenken	bbeenken11@gmail.com	NA	The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.

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108					If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project's noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	
109	12/29/2025	Garrett Fischer	g_fischer@live.com	NA	The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: •Block line of sight, equivalent in function to a 20-foot noise wall •Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios •Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties •Be entirely contained on public property •Require no private easements or encroachment onto residential land •Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness.	See response to Comment 195.
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110	12/29/2025	Scott Cloutier	SACloutier@fedsins.com	NA	The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.

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111	12/28/2025	Tyrel Alastair Hunter	ialastairhunter@me.com	210 N oak Ave Apt 306, Owatonna, MN 55060	The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
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112	12/28/2025	Kelsey Buchardt	kesbuchardt@gmail.com	NA	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
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113	12/28/2025	Lance Woltman	devildog2043@gmail.com	2555 Stony Creek Dr, Owatonna, MN 55060	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
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114	12/28/2025	Greg/Kari Wiste	kwiste13@gmail.com	2545 Mossy Creek Dr, Owatonna, MN	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
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115	12/28/2025	Andreina Torres	a_torres17@yahoo.com	NA	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
115					If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County’s consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	

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116	12/28/2025	Colin/Sherri Whalen	scwhalen@charter.net	2435 Briarwood Pl NE, Owatonna, MN	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
116					If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County’s consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	
117	12/29/2025	Nicole Schulz	nrschulz@fedins.com	2535 Stony Creek Dr	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
117					If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County’s consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	

Comment	Date Received	Name	Email	Address	Comment	Comment Response
118	12/28/2025	Donald/Susan Mullenbach	dsmully@msn.com	2535 Mossy Creek Dr NE, Owatonna, MN 55060	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.	See response to Comment 195.
118					If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW.	
119	12/29/2025	Kay Klemmer	kayl.klemmer@gmail.com	NA	I’m writing to share my thoughts on the East Side Corridor and Environmental Assessment Worksheet: My understanding it was meant to be a roadway to get from the North to the South end of Owatonna along the east-side of town. In the EAW, it states: Project Purpose: to improve the connectivity of Steele County’s transportation network. Project Needs: are the main transportation problems to be solved or the reason the Project was initiated. Secondary needs are other transportation problems or opportunities for improvements that could be addressed, if feasible. “Primary Need: Vehicle Mobility-Poor Connectivity” “Secondary Need: Walkability/Bikeability Some where over the course of several years it turned into other things adding a multi-trail system along the roadway with curb & gutter and storm sewer. Adding additional cost to the project. The plan is to develop a new roadway at 29th Ave which I feel is too close to the city. Also, the proposed project extends north along the Countryview Park where it get too close to residential homes. Bringing up noise and safety issues for them. The EAW is incomplete, and is missing a Noise Impact Study. Residents were never made aware of a noise study. Feel the entire roadway should be moved further east to alleviate running through prime farmland and causing the noise & safety issues with residents. There is an existing road (34th Ave) that is approx 1 mile east. Why build more roads when existing ones are in place? I recommend a full Environmental Impact Statement (EIS) be conducted to study the Noise and Safety issues.	**Purpose and Need** As indicated in the purpose and need in the EAW Section 6, there are limited continuous north-south routes linking the northern and southern portions of the city and the east-west routes within the community. Residents are required to use multiple roadways to make north-south trips and use neighborhood roads which are not designed to carry through traffic due to the number of driveways and conflict points. 29th Ave provides that connection where development exists nearby and is expected to be in the future. MnDOT’s Access Management Manual (effective January 2, 2008) recommends spacing of 1 to 3 miles between roadways. The proposed East Side Corridor/29th Ave Corridor would provide approximately 2.2 miles of spacing from Cedar Avenue, consistent with recommended spacing guidelines. 34th is approximately 3 miles to the east, but would not serve existing development and traffic as well. Preparation of an EAW does not require an alternatives analysis under MEPA. The alignment at 29th addresses the documented transportation needs. **Project Cost** Project costs will evolve as projects are further developed. A trail was the preferred option for addressing secondary needs related to walking and biking. **Noise study** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
119						**Move to 34th** Comment noted. This alignment would go through farmland and would have farmland impacts. **Farmland Impact** The EAW does denote impacts to farmland in Section 10. The project does impact approximately 62 acres of farmland. The county will work with impacted property owners to address tiling/drainage concerns that can be addressed as the design progresses. Right of way acquisition processes will address mitigation and compensation. **EIS Request** The county board will consider the need for an EIS under MEPA requirements.
120	12/28/2025	Jerry Pettipiece	jerrypettipiece@gmail.com	NA	The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether.	**Noise study** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. **Federal Undertaking** The project does not have federal funding and is not considered a federal undertaking. Section 15 of the EAW inadvertently makes reference to a federal undertaking. That is incorrect. Please see response to comment 28 and Comments 248 and 249. **Sequencing - Avoid, Minimize, Mitigate** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required.
120					If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness.	**Berm Mitigation** See responses above. Project is not a federal undertaking and is exempt under state requirements. The county has offered to include berming as noted above. The berm would be in the public right of way and would not impact adjacent property. It would be approximately 2.5 to 3 feet high. **Neighborhood Streets** Currently, the only connection to the North Country neighborhood is via Rose Street, which creates a longer navigation and connection for emergency vehicles. Creating another connection into the neighborhood alleviates the emergency vehicle access issue. This was requested by the city and incorporated into the design as shown in the project layout included in the EAW. Traffic entering the city street would be destined for the neighborhood, as it would be neighbors and their guests using the access if they were travelling southbound. If traffic is northbound, they would use Rose Street, as the entrance at Fox Hollow is a right in/out access only. Fox Hollow was designed to connect to a future north-south roadway. Traffic volumes on Fox Hollow Ln will increase, but it is trips destined for the neighborhood and does not constitute a significant impact/change. Human health impacts are not required as part of the EAW.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
121	12/31/2025	Jeff Otto	jeffotto74@yahoo.com	2490 Fox Hollow Lane	I formally request that Steele County require a **full Environmental Impact Statement (EIS)** for the East Side Corridor project. Based on the information provided in the EAW and materials withheld from the public, the project clearly exceeds the threshold for significant environmental effects under Minnesota Rules 4410.1200. Steele County turned over the responsibility of constructing the mapped corridor to the city of Owatonna, documented in a 2004 county study. The city of Owatonna subsequently relinquished the rights to 1/3 of the mapped corridor to a housing developer and numerous houses were constructed on what was originally part of the mapped corridor. The city also built multiple streets to connect to the mapped corridor, creating three intersections with the mapped corridor within five blocks. A recent noise study that was completed as part of the EAW indicated a need for a 20 foot noise wall; but the report was then omitted from the EAW. I am requesting an EIS because the EAW is missing required impact analyses and it contains a predetermined outcome. • The noise study was not included. An internal memo from WSB suggested moving the road out to comply with noise standards • No road in Steele County has ever been built this close to a housing development • The right of way was abandoned o an entire neighborhood was developed with numerous houses constructed on the right-of-way o an entire neighborhood was developed with three intersections within five blocks to a right-of-way; the neighborhood was developed to connect to a city street – not a controlled access arterial road. o Owatonna city council passed a resolution in August 2013 to officially abandon the road but the resolution was omitted from the EAW • Avoidance options should be evaluated	**EIS Request** The county board will consider the need for an EIS under MEPA . **Right of Way Abandonment** Comment Noted **Noise study** As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. The noise study referenced was a federal requirement to address federal standards and regulations. The project no longer has federal funding and is not subject to federal requirements. A noise wall is not required. **No road of this proximity has ever been built in Steele County** Comment Noted **Avoidance** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required.
122	12/31/2025	Becky Dawley	becky_dawley@hotmail.com	960 Countryview Ave	Based on the order in which ESR steps occurred, this project shows the county predetermined the option they chose: •Preferred alternatives were identified before the project was public •Alternatives were dismissed using assumptions rather than calculations and actual facts •Avoidance options were not fully evaluated despite being less expensive •Right of way abandonment occurred over decades without contention •No road of this proximity to homes has ever been built in Steele County Environmental review cannot occur after decisions have already been made. The EAW was used to justify a predetermined outcome, not or evaluate alternatives. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. It's time to do legitimate problem solving rather than accepting foregone conclusions.	**Alternatives Analysis** Preparation of an EAW does not require an alternatives analysis under MEPA. **Avoidance** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required. **Right of Way Abandonment** Comment Noted **No road of this proximity has ever been built in Steele County** Comment Noted **EIS Request** The county board will the need for an EIS under MEPA and make a determination on a FONSI under MEPA.
123	12/30/2025	Mark Schultz	fssmschultz22@gmail.com		It's an absolute swamp land in my backyard and where road is suppose to go! I have to wait 3 days to ow after a good rain. The field on other side of my fence usually has standing water. How do they expect this to be good land for a road?	Comment Noted. Additional soils analysis will be analyzed during the final design stage of the project.
124	12/30/2025	Jerry Pettipiece	jerrypettipiece@gmail.com		The County prematurely eliminated alternatives that would have avoided significant environmental impacts in favor of a predetermined route driven by development rather than transportation needs, while omitting the true scope and impacts of the project from the EAW; therefore, a full independent Environmental Impact Statement (EIS) is required.	Preparation of an EAW does not require an alternatives analysis under MEPA.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
125	12/30/2025	Debra Schrader	dsch255@aol.com	518 E. Main Street	We formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Based on the information provided in the Environmental Assessment Worksheet (EAW) and materials withheld from the public, the project clearly exceeds the threshold for significant environmental effects under Minnesota Rules 4410.1200. The EAW is incomplete, improperly segmented, and fails to analyze required impacts related to noise, safety, air quality, human health, traffic, environmental justice, and cumulative effects. Independent oversight and an independent RGU are necessary to ensure compliance with MEPA and NEPA. Steele County, the City of Owatonna, and their consultants improperly segmented a single, connected transportation and development system into multiple projects to avoid full environmental review. The following projects function as connected actions and must be reviewed together: ● East Side Corridor (ESC) ● 18th Street expansion and trails ● 18th Street railroad roundabout ● 26th Street roundabout ● Owatonna High School relocation ● Utility expansions and substation upgrades ● Havana intersection project ● Main Street project ● Fire and Police Station relocation ● Adjacent housing and commercial development identified in Imagine Owatonna Federal and state law prohibit segmentation when projects: ● depend on one another, ● are justified by the same traffic or development need, or ● cumulatively increase impacts.	**EIS** The county board will determine if an EIS is needed in accordance with MEPA requirements. **Incomplete** Comment noted. No explanation of incompleteness. Please refer to the EAW for topics required to be studied and information in the EAW. **Segmented** If multiple actions are connected, environmental review may be needed for the project that may not have been required if it was a standalone action. Three types of relationships between projects qualify as connected actions (part 4410.0200, subpart 9c): One project induces the other; One project is a prerequisite for the other and is not justified by itself (the first occurring previously or simultaneously); or Neither project is justified by itself; that is, the two projects are interdependent parts of a larger whole project. Whenever two or more projects are related in any of these ways, they must be considered as one project, regardless of ownership or timing (parts 4410.1000 and 4410.2000, subparts 4). See responses to Comments 57, 58 and 61 Please refer to the purpose and need statement in the EAW for the reasons the project is being advanced.
125					Additionally, the public process was fundamentally flawed: ● Only two days' notice for the first open house ● Notice of the EAW comment period received two weeks late ● RFPs were signed before public disclosure ● RFPs and study data were withheld from public access ● A 61 page federal memorandum was kept from residents ● Residents were denied a comment period after approval of purpose, need, and preferred alternative on 9/24/2024 The above actions denied residents the opportunity to correct inaccuracies before information was submitted to state and federal agencies. Here, each project was used to justify the next, while being excluded from environmental analysis. This is classic segmentation and requires a single, unified EIS. We formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here. While we do not live in the East Side Corridor area, all residents of Steele County and the City of Owatonna are impacted by the decisions made concerning the ESC. We are all dependent upon the actions of Steele County and the City of Owatonna to request the appropriate surveys, assessments, and studies to ensure impacts related to noise, safety, air quality, human health, traffic, environmental justice, and cumulative effects are understood. Decisions need to be focused on safety, sustainability and community well-being. However, before decisions are made, County and City leaders must hear and understand residents' feedback, giving residents adequate notice to attend meetings or provide written feedback and to give County and City leaders time to comprehend and respond to that feedback. There have been many breakdowns in communications and notifications where studies are being done, directions determined and decisions made with no public knowledge or feedback. We have seen communication and process failures when attending meetings not only for the ESC project but also other projects (referenced above), realizing that decisions were already made and the residents' feedback meaningless. Over and over we hear "why bother, they've already decided what they are going to do". Bottom line, for every project run by Steele County and the City of Owatonna, we are talking about people's safety, homes, and lives. Let's work together to get it right.	**Flawed Process** Please see response to Comment 193 and 236. Under MEPA, an EAW is to allow for and provide opportunities for public comment during the official public comment period. Steele County provided additional opportunities for public input during the project development process. Other opportunities for public involvement were not required. RFPS do not need to be disclosed. The project does not have federal funding and federal studies are not a part of the EAW. The EAW addresses noise according to state requirements, not federal requirements
126	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		Please accept the attached document as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) administrative record for the East Side Corridor project. This submission is identified as ESC EAW Comment #52 and consists of a community petition supporting the 34th Avenue alternative and requesting consideration of environmental, safety, land-use, agricultural, and floodplain impacts as part of the environmental review. Please confirm receipt of this submission and that it has been entered into the official EAW record.	Petition - Comment Noted Request for Consideration on Environmental Review A project is currently under environmental review. The county board will determine whether there is the potential for significant impacts under state MEPA requirements and further determine if an EIS is needed under MEPA. The county is not required to study other alternatives. Request is noted.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
127	12/30/2025	Alicia Pichner	Apicher9@gmail.com	2183 SE 24th Ave	I am submitting this comment to formally oppose the East Side Corridor project as currently scoped and advanced, including the proposed alignment through our farmland (including one of our best-producing fields and the addition of stormwater features (including two proposed retention/retainment ponds) in productive acreage. I want to be clear: a new road is already a major permanent taking and long-term burden. Adding a rural multi-use walking path—with the associated curb, gutter, storm drain infrastructure and maintenance obligations—turns a bad project into a fiscally irresponsible one. I'm asking you to stop treating the trail component like an unquestionable default, and to stop asserting public demand without producing proof. 1) The project's own materials show an expensive scope—yet critical justification remains vague. Your Highway Capital Improvement Plan (CIP) identifies the East Side Corridor as a new north–south route approximately 5 miles long and explicitly states that "a multi-use trail will also be constructed along side the route." The same CIP section indicates total project costs of approximately $23,743,984 (with $20,000,000 shown for construction, plus right-of-way, utilities, and engineering). That is an enormous expenditure to push forward while relying on broad, unquantified statements about "connectivity" and "downtown traffic" and while the public is still being asked to react to documents rather than a truly transparent, data-grounded case. 2) The "people want it" claim—especially for the trail—is not an acceptable basis for adding millions in scope. At a county meeting I attended, the justification for the walking path was summarized as "the people want it," without substantiating evidence, a defined population ("which people?"), or a demonstrated need that outweighs the cost and impact of running a path through rural farmland. If the trail is truly demanded and truly justified, then show it—with: • Statistically valid survey methodology (sample size, sampling frame, response rate, margin of error), • Who was surveyed (city residents vs township residents vs impacted landowners), • What exact question was asked (wording matters), • And whether respondents were told the full cost implications and the farm/land impacts of routing it through prime ground. Absent that, "people want it" reads as a convenient talking point used to justify a pre-selected wish list rather than responsible public infrastructure planning.	See comment response to 175
127					3) The rural multi-use trail is scope creep with major cost multipliers and long-term liabilities. Your own CIP indicates the trail is part of the corridor build. But a trail along a rural road is not a strip of pavement "for free." It commonly drives additional: • Curb and gutter, • Storm sewer / drainage structures, • More right-of-way width and grading, • More crossings and signage, • More ongoing maintenance and liability exposure. This is precisely the kind of "nice-to-have" add-on that becomes a multi-million-dollar multiplier—and then becomes a permanent maintenance commitment (snow, surface repair, vegetation, drainage, signage, and safety). If the County/City believes a trail is a priority, then it should be evaluated as its own project, with its own demand study, cost estimate, funding plan, and routing alternatives—not stapled onto a rural roadway build and treated as inevitable. 4) Taking productive farmland (and adding ponds within it) imposes real, permanent economic harm that is not being treated seriously. This corridor cuts through high-performing ground. A road is not simply "land removed from production." It creates: • Permanent field fragmentation (lost efficiency, more turns, smaller passes), • Damage to tile system and tile main • Compaction and drainage side-effects from construction, • Access and equipment maneuverability constraints, • Increased risk of trespass and nuisance impacts, • And the long-run loss of flexibility in cropping and conservation practices. Adding two stormwater ponds in the same field compounds the damage: more acres taken out of production, more disruption to existing drainage patterns, and more uncertainty about future maintenance and sediment management responsibilities. If stormwater treatment is necessary, it should be sited and designed to minimize destruction of prime agricultural ground, not defaulted into the middle of some of the most productive acres simply because it is convenient on a plan sheet.	

Comment	Date Received	Name	Email	Address	Comment	Comment Response
127					5) The County's own project schedule and "official map" history do not justify pushing today's residents and landowners into a bad decision. Your Highway "Future Projects & Studies" page describes the East Side Corridor's stated purpose (north–south connection, diverting downtown traffic) and references historical mapping going back to 1999–2000. But a decades-old "official map" is not a substitute for a current, defensible, data-driven project scope—especially when costs are now in the tens of millions and when the project adds expensive non-road components like a multi-use trail. 6) The comment period must result in real scope changes—not a box-check. The County's public notice confirms the EAW comment period (Nov 18 to Dec 31, 2025) and the associated open house and comment channels. If this process is meaningful, you should be willing to make substantive changes based on comments—especially from directly impacted landowners and taxpayers. What I am asking you to do (specific actions) 1. Remove the multi-use trail from the East Side Corridor project scope and evaluate it separately with a documented demand study and transparent cost breakdown. (Your CIP already states the trail is included; that is exactly why it must be scrutinized.) Revize+1 2. Publish a line-item cost estimate that separates: roadway, right-of-way, utilities, stormwater, trail, curb/gutter, storm sewer, and long-term maintenance assumptions—so taxpayers can see what is being added and why. 3. Provide the evidence behind claims of public support ("the people want it"), especially for the trail: survey data, meeting input summaries with counts, and documentation of how input altered the design. 4. Require alternative alignments and/or design solutions that minimize prime-farmland takings and avoid placing stormwater ponds in top-producing acres unless there is no feasible alternative. 5. Commit to a standard that rural add-ons must meet: necessity first, not "nice-to-have." If it cannot be justified with clear need and benefit relative to cost and harm, it does not belong in the project.	
127					Closing This project—especially with a multi-use trail attached—reads as expensive, loosely justified, and poorly disciplined in scope. A road already creates permanent damage to productive farmland; adding ponds and a "walking path because people want it" escalates the harm and the cost while the underlying justification remains frustratingly vague. I respectfully request that you treat this comment as formal opposition and that you respond with: • Whether the trail can be removed from scope, • How public demand has been measured, • And how you will mitigate the permanent economic harm to our farm ground	
128	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. MEPA and NEPA require that environmental impacts be avoided where feasible and that reasonable alternatives be fully evaluated and disclosed to the public. The Environmental Assessment Worksheet (EAW) for the East Side Corridor fails to meet this standard by omitting Alternative 3B, a feasible avoidance alternative that was known, studied, and relied upon internally but excluded from the EAW. Project correspondence from 2023–2024 shows that the County, its consultant, and state partners evaluated a realigned version of Alternative 3 that would move the roadway several hundred feet away from existing homes to reduce noise impacts. Internal emails and contract amendment records confirm that Alternative 3B was designed, modeled, and analyzed, including noise modeling and consideration of mitigation options. This demonstrates that Alternative 3B was operationally advanced and met project criteria, not merely conceptual. Additional correspondence indicates that County staff and consultants understood roadway relocation (Alternative 3B) to be the appropriate avoidance response to noise impacts, including discussion of shifting the roadway rather than constructing a noise wall. Despite this, Alternative 3B was not disclosed to the public and was not identified in materials presented to decision-makers when the preferred alignment was selected. Although state and interagency correspondence referenced in the project record acknowledges alignment shifts and specifically references "3B," the EAW omits Alternative 3B entirely. The EAW therefore fails to evaluate its environmental impacts, fails to compare it against the selected alignment, and presents an incomplete and misleading alternatives analysis. Because Alternative 3B represents a feasible avoidance alternative that was known and studied but excluded from the EAW, the environmental review is incomplete and procedurally deficient. The EAW must be revised to include full evaluation of Alternative 3B. Absent that correction, preparation of an Environmental Impact Statement (EIS) is warranted.	Preparation of an EAW does not require an alternatives analysis under MEPA. It also does not require public input in the development of the project. Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required. The project does not have federal funding and is not subject to NEPA. EIS The county board will determine whether an EIS is needed under MEPA.
129	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The EAW includes an alignment map dated April 29, 2022, yet the project was not made public until July 21, 2022. When a specific alignment is mapped months before public notice and later presented through environmental review, serious concerns about predetermination are raised. Environmental review is required to inform decisions and evaluate avoidance and alternatives before an alignment is effectively committed. Presenting a mapped alignment after the fact does not constitute meaningful public participation. Because the record suggests the alignment was identified prior to public disclosure, the EAW cannot support a Finding of No Significant Impact (FONSI). A lawful review must address whether decisions were made in advance and fully evaluate avoidance and reasonable alternatives. An EIS is required.	Preparation of an EAW does not require an alternatives analysis under MEPA. It also does not require public input in the development of the project. Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
130	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. Because the East Side Corridor is being advanced alongside multiple connected roadway projects, the impacts cannot be understood by reviewing each piece in isolation. Together, these projects function as a single system that will significantly affect traffic, safety, noise, neighborhoods, and long-term costs. That is exactly why an Environmental Impact Statement (EIS) is required. An EIS would evaluate the cumulative impacts, whether one corridor could meet the need, and which alternative causes the least harm before irreversible decisions are made. For the ESC, segmentation makes the current review inadequate and incomplete — an EIS is necessary.	Comment noted. No reference to projects provided. **EIS** The county board will determine if an EIS is needed based on MEPA requirements.
131	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. After reviewing the EAW and the County's own data, it appears the project does not meet its stated Purpose & Need: • Purpose & Need #1 – 1–3 Mile Spacing: All alternatives, including routes as far east as 34th Ave, meet the spacing requirement. No unique benefit has been shown for 29th Ave. • Purpose & Need #2a – North/South Travel Times: Standard travel-time calculations show no meaningful improvement on 29th Ave. Some alternatives perform better. • Purpose & Need #2b – Downtown Congestion: MnDOT traffic data shows downtown traffic has decreased, not increased. A new roadway is not justified by current conditions. • Purpose & Need #2c – Truck Traffic: In response to a formal data request, the County confirmed: – No traffic counts – No truck volume data – No modeling showing diversion There is no documented truck-traffic problem to solve. • Purpose & Need #3 – Development: Highlighting "future destinations" suggests a land-use goal, not a transportation need. Because the project does not meet its stated Purpose & Need, the environmental review cannot move forward as written. Without a Purpose & Need, there is no project to advance. An Environmental Impact Statement (EIS) is required.	**Purpose and Need** As indicated in the purpose and need in the EAW Section 6, there are limited continuous north-south routes linking the northern and southern portions of the city and the east-west routes within the community. Residents are required to use multiple roadways to make north-south trips and use neighborhood roads which are not designed to carry through traffic due to the number of driveways and conflict points. 29th Ave provides that connection where development exists nearby and is expected to be in the future. Traffic volumes remain a concern on identified roadways. Traffic volumes do fluctuate over time and additional traffic is expected in the identified routes in the future. Truck traffic is not called out as a purpose and need item. As explained in the EAW the project is needed to serve existing demand and development. It will also provide a benefit for future development when/if it occurs. **All Alternatives Meet Spacing Requirements** Preparation of an EAW does not require an alternatives analysis under MEPA. The alignment at 29th addresses the documented transportation needs. **EIS** The county board will determine whether an EIS is required under MEPA.
132	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. I submit this comment to formally request preparation of an Environmental Impact Statement (EIS) for the East Side Corridor / 29th Avenue project. A 143-page Traffic Noise Analysis Report prepared by WSB for Steele County, dated December 14, 2024, exists and was submitted to the State of Minnesota on behalf of Steele County. This report was not included in the Environmental Assessment Worksheet (EAW) materials provided for public review. The omitted noise study documents significant impacts, including: - 82 homes classified as substantially impacted, and - 57 substantially impacted homes located in the North Country neighborhood. The study further evaluates mitigation and concludes that a 20-foot noise wall is required to meet minimum noise reduction criteria. Even with mitigation, the report shows that many homes would continue to experience substantial and potentially life-altering noise impacts. Because this noise analysis existed prior to publication of the EAW and was prepared for the project by the County's consultant, its exclusion prevented meaningful public participation and informed review of noise impacts, mitigation feasibility, and avoidance alternatives.	**EIS** The county board will determine whether an EIS is needed based on MEPA requirements. **Traffic Noise Report and Minn Rules** The traffic study was prepared to comply with federal requirements which are different than state requirements. There is no longer federal funding for the project and federal noise analyses and determinations are not relevant. The EAW addresses state noise requirements under MEPA. The project is exempt from state noise requirements as the roadway is owned by a county and is not fully access controlled. The county did consider changes in land use near existing development and incorporated opportunities for input on berming, landscaping and fencing. The county also changed design of the roadway to lessen sound impacts. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards. Please note one of the referenced rules is federal CFR. The project is not under federal rules.
132					The omission of this study constitutes a material deficiency, not a technical oversight. Without disclosure of known, significant noise impacts and mitigation requirements, the EAW cannot support a lawful finding of no significant environmental impact (FONSI). Pursuant to Minn. R. ch. 4410, 23 CFR 772, MnDOT noise requirements, and Minn. R. ch. 7030, the documented scope and severity of noise impacts, combined with the incomplete disclosure in the EAW, require preparation of a full Environmental Impact Statement (EIS) to evaluate: - the extent of noise impacts, - avoidance alternatives, - feasible and reasonable mitigation, - and cumulative impacts to affected neighborhoods. For these reasons, I respectfully request that an EIS be ordered for this project.	

Comment	Date Received	Name	Email	Address	Comment	Comment Response
133	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The Environmental Assessment Worksheet (EAW) for the East Side Corridor is legally insufficient because it fails to evaluate avoidance and reflects a predetermined, development-driven outcome, which precludes a lawful Finding of No Significant Impact (FONSI). Under Minn. R. 4410.1400, the Responsible Governmental Unit (RGU) is responsible for the completeness and accuracy of the EAW. Environmental review requires evaluation of reasonable alternatives, including avoidance, before commitments are made. This EAW does not meaningfully analyze avoidance, nor does it transparently compare alternatives that would reduce or avoid impacts to residents and the environment. The record shows that at least one alternative exists that meets federal transportation requirements and reduces impacts, yet it was not fully disclosed or evaluated in the EAW. Instead, the preferred alignment aligns with existing development agreements and planned utility redevelopment, indicating that the project's alignment was shaped by development considerations rather than transportation needs. Transportation projects cannot be development driven. When an alignment is effectively selected in advance and alternatives are screened out due to conflicts with development plans, predetermination has occurred, violating the purpose of environmental review. Because avoidance was not properly evaluated and significant environmental effects have not been ruled out, the RGU cannot lawfully issue a FONSI. A full Environmental Impact Statement (EIS) is required to evaluate avoidance, alternatives, and cumulative impacts before irreversible decisions are made.	**Legally Insufficient EAW** Preparation of an EAW does not require an alternatives analysis under MEPA and it does not require sequencing - avoiding, minimizing and mitigating. Those are federal requirements. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Because the project does not have federal funding for construction it does not require federal evaluations. **Minn Rules 4410.1400** See response above. **Alternatives Meeting Federal Requirements** See response above. Please refer to Section 6 of the EAW that clearly outlines the purpose and need for the project - it is to address identified transportation deficiencies. **Predetermination** See responses above. **EIS** See responses above. The county board will determine if an EIS is needed in accordance with MEPA requirements.
134	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. During this EAW comment period, statements and submissions have been made by individuals who are members of the project team and/or are acting on behalf of the Responsible Governmental Unit (RGU). While MEPA does not prohibit agency staff or officials from providing technical information, the use of the public comment process by project team members to defend a preferred alternative, minimize impacts raised by the public, or justify prior decisions raises serious procedural concerns. Under Minnesota Rules, part 4410.3100, a governmental unit shall not take actions that would prejudice the ultimate decision on a project prior to completion of environmental review. Comments submitted by project team members that advocate for project outcomes, rebut public concerns, or assert that impacts have already been adequately mitigated risk prejudicing the environmental review process and undermine the neutrality required under MEPA. Additionally, internal or agency-generated comments cannot substitute for missing analysis or cure deficiencies in the EAW itself. Environmental review must be based on information contained in the EAW and its incorporated studies, not post-hoc explanations or advocacy submitted during the comment period. For these reasons, any comments submitted by project team members should be clearly identified as agency input, segregated from public comments, and not relied upon to support a negative declaration or finding of no significant impact (FONSI). The presence of advocacy or outcome-oriented statements by project team members further demonstrates that the EAW is incomplete and biased toward a predetermined outcome and supports the need for preparation of a full Environmental Impact Statement (EIS).	**Statements and Submissions** No members of the project team have provided a comment on the EAW nor have members of the RGU making the decision. The city of Owatonna did submit a comment and resolution in support of the project. They are allowed to provide comment during the public comment period. Staff and project team members did attend the public open house meeting to answer questions asked by residents and elected officials. They are allowed to do this to answer questions, explain rationale and to provide context about information in the document. **Minn Rules 4410.3100** See response to Comment 162. **Comments Cannot Substitute for EAW** Comment noted. **Comments Cannot Support a FONSI** Comment noted. See responses above.
135	12/29/2025	Colin Whalen	cpwhalen71@gmail.com		I appreciate your attention to the Owatonna ESC EAW. I am submitting this email as a formal public comment on the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC) project. The project record demonstrates predetermination as defined under Minn. R. 4410.3100. Before the East Side Corridor project was publicly announced or subjected to environmental review, the County and its consultant had already taken multiple irreversible actions, including but not limited to: selecting WSB as the project consultant, estimating construction costs, designing intersections, mapping and naming a specific corridor (29th Avenue), and programming the project into multiple Capital Improvement Plans. County planning documents further describe the corridor location as having been "strategically chosen," indicating that the alignment decision preceded environmental analysis. Environmental review is intended to inform decision-making, not to justify decisions that have already been made. When a specific project location is effectively selected prior to completion of environmental review and before meaningful public participation occurs, the integrity of the environmental process is undermined. Because the record shows that key decisions were made prior to environmental review, the EAW fails to provide an objective evaluation of reasonable alternatives as required under MEPA. This constitutes predetermination and necessitates preparation of an Environmental Impact Statement (EIS) to ensure full disclosure of impacts, genuine alternatives analysis, and meaningful public participation before any final decisions are made.	Please refer to response to Comment 173.
136	12/31/2025	Sara Pichner	spichner@yahoo.com		Good morning, I am writing to request an Environmental Impact Statement (EIS). The County prematurely eliminated alternatives that would have avoided significant environmental impacts in favor of a predetermined route driven by development rather than transportation needs, while omitting the true scope and impacts of the project from the EAW; therefore, a full independent Environmental Impact Statement (EIS) is required.	Please refer to response to Comment 1 regarding the purpose and need and the selection of the preferred alternative.
137	12/30/2025	Dale Benjamin	superiortrophyco@msn.com	2111 Hill Drive	I have lived at the intersection of Hill drive And the Dane road for over forty years. I am appalled with this great waste of our tax money and opposed to this project.	Comment noted.
138	12/31/2025	Robert Grant	7589co13@gmail.com		I think you need to see all the wildlife that is down a long maple creek from deer, turkeys, pheasant, wood ducks, snapping turtles, fox, rabbit's, eagle, owls,shiner minnows, Hungarian partridge, crayfish. It is it own ecosystem down along the creek and the flood fringe.	Comment noted.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
139	12/31/2025	Robert Grant	7589co13@gmail.com		I would like you to tell me why you want to put a beltway so closely to existing homes? If you build 34 or 44 you already have the land that way people can choose to live next to the road and road noses plus I thought that a belt line was too go on the outer limits of town not to benefit developers. By building on 34 or 44 you could have better control over site corners how closely build to the road. In conclusion a 1/2 mile is not that far to go 34 or even 1 1/2 miles to 44 it would make a straight shot north and south	The purpose and need for this project is not a beltway. Please refer to Section 6 in the EAW for an explanation of the purpose and need for the project.
140	12/31/2025	Robert Grant	7589co13@gmail.com		I would like to see all the documents from all the different routes so I can see how you came up with this as the only way to go? Because twenty plus years ago I went to meeting on development to the west of me at those meeting they talked about 34 or44 because you already have the right away.	Please refer to response to Comment 1 regarding the purpose and need and the alternative studied.
141	12/31/2025	Robert Grant	7589co13@gmail.com		I am concerned on the noise that the project with the increased traffic noses by increasing traffic from 6 cars a day to over 2000and by building it so closely to my sons house I would like to know what plans you will do the increased noise levels.	Please see responses to Comments 20 and 28.
142	12/31/2025	Robert Grant	7589co13@gmail.com		I am concerned on the placement of the road and bridge on my property .by building the road on the flood fringe you are taking all the capacity for high water events which will my sons house to the east of the project. So I am asking for the risk assessment so I can have a independent study done. I spent my hole career with mndot bridge for a total of 40 years I have seen what water does when it can't spread out.	Please refer to Section 12 of the EAW which contains information about the floodplain and Attachment D of the EAW which includes the risk assessment. As noted in the EAW, additional coordination will be required will be required as design is advanced.
143	12/31/2025	Robert Grant	7589co13@gmail.com		I would like you to sit down with all the parties involved and make all the documents on all routes and show why 29 Ave is the best place for the road when 20 years ago it wasn't even talked about you also to let the people know a head of when things are the agenda so a person can be there for public documents and need to send out notices at least 9 days ahead of time. Now that you do not tape the meeting people can't no what's going on in county no body gets a paper any I think you should put your own camera's in so the taxpayers can see what's going we need more transparency.	Comment noted. County Board meetings have official meetings published which are included on the county's website. Please refer to response to Comment 1 regarding the purpose and need and the selection of the preferred alternative. Several studies have been completed for various reasons on the eastern side of Owatonna, including a beltline/beltway. That is not the purpose and need for this project. The county would be happy to meet with you and your son.
144	12/31/2025	Jeff Otto	jeffotto74@yahoo.com	2490 Fox Hollow Lane	I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Based on the information provided in the EAW and materials withheld from the public, the project clearly exceeds the threshold for significant environmental effects under Minnesota Rules 4410.1700. The ESC project has a clear federal nexus, triggering NEPA requirements: •A railroad crossing requiring federal permits •Federal funding used for related roadway and roundabout construction •Federal documents referenced in the EAW and on the project website •Use of federal funds to study or progress the project, including CRRSA funds •As of April 1, 2025, this project was declared a federal undertaking oQuotes from articles printed in the Owatonna Peoples Press: The contract for the environmental study came with a $234,000 price tag, with funds coming from COVID-19 relief funds from the federal government, according to Steele County Engineer Greg Ilkka. According to City Engineer Sean Murphy, there is approximately $2.3 million of funding available from the Federal Transportation Alternatives Program for the district Owatonna is in for the year 2028 — when the project would likely take place. If the grant is received, it will help connect the city trails from 26th Street to 18th Street along the corridor. A letter of intent was submitted on Nov. 3 and was reviewed by the Minnesota Department of Transportation, working in conjunction with the TAP program, to submit a full application for the 2028 grant cycle. Murphy said previous trail segments on 18th Street from Linn Avenue to Hayes Avenue were awarded TAP grant funding Though this is a county-led project, the city does have buy-in. While Steele County has received $3.96 million from the FHWA for this project, and intends to pursue additional grant funds, other sources of funding could include the city and the state.	**EIS** The county board will determine the need for an EIS under MEPA requirements. **Project has a Clear Federal Nexus** **A Railroad Crossing Requiring Federal Permits** Federal permits do not require full federal environmental documents. The permits all have requirements which the county will be required to meet in order to obtain them. Anticipated permits are included in the EAW (Section 9) and updated in the FOFC. **Federal Funding used for related roadway and roundabout construction** Federal funding was removed from this project. This project is independent of other projects constructed by the county. We do not know what projects are being referenced. If it is regarding the transfer of funding from this project to Main Street (a separate project to reconstruct the existing roadway) Main Street already had federal funding included and would meet the fiscal 2026 deadline. The Main Street project had a federal document completed. **Federal documents referenced in EAW and Project Website** The project does not have federal funding for construction. Reference to cultural resources in the EAW in Section 15 and its attachment was inadvertently left in the document indicating the project was a federal undertaking. Please see Comment 28 and Comments 248 and 249 from MnDOT indicating the project is not a federal undertaking. The project website clearly indicates that federal funding had been removed from the project.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
144					•The EAW is influenced by a predetermination of outcome. oThe project was a federal undertaking until a noise analysis was completed requiring avoidance or mitigations that conflicted with the predetermined preferred alternative oAlternative 3b was studied but omitted from the EAW (referenced in the MnDOT CRU letter) oOwatonna city council passed a resolution in August 2013 to officially abandon the road but the resolution was omitted from the EAW oOn April 23, 2025 the county engineer warned the County Administrator, City Engineer, and City Administrator that the FHWA warned that no votes on alternatives should take place before review was completed. Despite that: •On May 13, 2025 Owatonna Township approved a resolution limiting the project to a single alternative. On May 27, 2025 the county quietly accepted this resolution. •On Dec 16, 2025 the City of Owatonna approved a resolution limiting the project to a single alternative, ROW acquisition, and cost sharing requirements, during the EAW comment period. Despite this, the EAW fails to address federally required noise, safety, and health analyses. Federal actions were relied upon to make substantial decisions, yet federal environmental standards were not applied. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	**Use of federal funds to study or progress project (CRRSA)** The use of federal funds were not for construction and do not require NEPA. **Quotes from Owatonna People Press** Comments Noted. This is not a part of this project. It is a trail project being led by the city in a different part of the city. **Federal Undertaking Until Noise Analysis** Federal funding was removed from the project for multiple reasons. Please see response to Comment 28. **Alternative 3B Omitted** See above, federal funding was removed from he project. Reference to cultural resources was inadvertently left in the document indicating the project was a federal undertaking. Please see Comment 28 and Comments 248 and 249 from MnDOT indicating the project is not a federal undertaking. Under MEPA, an alternatives analysis is not required for an EAW. **August, 2013 - Owatonna Council Resolution** Comment noted
144						**April 23, 2025 - FHWA Vote** The project does not include federal funds for construction, preparation of an EAW does not require an alternatives analysis under MEPA. Federal studies are not required. The EAW does address state requirements regarding noise and includes information on Air Quality and Greenhouse Gas emissions which could impact health. Safety has been considered as part of the project and has been incorporated into its design. Decisions impacting safety have included using a lower design speed (40 miles per hour) including roundabouts at key intersections to slow traffic and to provide better crossings for non-motorized users, including a trail for non-motorized users, and incorporating an urban design near developed areas to slow travel speeds. **May 13, 2025 - Owatonna Township Resolution** Other governmental agencies are allowed to provide comment and input on their preferences for alternatives. The township indicated in their resolution that it was consistent with the annexation agreement and that is why they supported it. It was included as full disclosure of the township's interest in the project and its annexation agreement with the city, but it did not determine the alternative under review in EAW. The RGU makes the determination on the project, not the township. **December 16, 2025 - City of Owatonna Resolution** The city of Owatonna chose to submit a resolution in support of the project. It was not at the county's behest. Please see response to Comment 232. **FONSI** The county board will determine if studies are adequate to make a FONSI and Negative Declaration under MEPA.
145	12/31/2025	Jeff Otto	jeffotto74@yahoo.com	2490 Fox Hollow Lane	The EAW fails to address federally required noise, safety, and health analyses. I formally request that Steele County require a full Environmental Impact Statement (EIS) for the East Side Corridor project. The city of Owatonna is making significant changes to neighborhood streets by making Fox Hollow Lane the only street to connect to the East Side Corridor in the Countryview neighborhood. · Fox Hollow Lane is only three blocks from a major intersection on Rose Street · It is reasonable to expect all southbound traffic on the corridor will utilize Fox Hollow Lane to enter the neighborhood · Residents on this street would face excessive noise as a result of an open intersection. The open intersection represents a complete lack of avoidance and mitigation. · Fox Hollow Lane has homes on both sides of the street with driveway access, unlike Countryview Avenue (the current access street to the neighborhood) which only has homes on one side of the street with driveway access to the street. · No impact studies were completed or included · There were no informational meetings held to gather residents' input and concerns o City officials claimed these changes are the result of the county East Side Corridor project o A WSB representative stated they would prefer no intersections with the neighborhood as they are too close to Rose Street to meet standards · The argument the intersection on Timberwood Lane needs to be removed reinforces the claim the neighborhood was not designed to connect to a corridor Steele County and the city of Owatonna are making significant changes to neighborhood streets by making Fox Hollow Lane the only street to connect to the East Side Corridor in the Countryview neighborhood despite the fact residents have repeatedly requested it not be connected. I am formally requesting an EIS because safety impacts, noise impacts and human health impacts need to be studied for substantially impacted homes on Fox Hollow Lane.	**Failure to Address Federally Required Studies** The project does not have federal funding. See responses to comments 28, 248 and 249. Federal studies are not required when a project does not have federal funding. **Request an EIS** The county board will determine if an EIS is needed under MEPA requirements. **Neighborhood Streets** Currently, the only connection to the North Country neighborhood is via Rose Street, which creates a longer navigation and connection for emergency vehicles. Creating another connection into the neighborhood alleviates the emergency vehicle access issue. This was requested by the city and incorporated into the design as shown in the project layout included in the EAW. Traffic entering the city street would be destined for the neighborhood, as it would be neighbors and their guests using the access if they were travelling southbound. If traffic is northbound, they would use Rose Street, as the entrance at Fox Hollow is a right in/out access only. Fox Hollow was designed to connect to a future north-south roadway. Traffic volumes on Fox Hollow Ln will increase, but it is trips destined for the neighborhood and does not constitute a significant impact/change. Human health impacts are not required as part of the EAW. The project is exempt from state noise requirements as the roadway is not a fully access controlled facility.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
146	12/30/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the contradiction between the claimed “preserved corridor” and the City's prior determination that the project was not foreseeable for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	Comment noted. Schedules for a project change over time and are dependent upon other processes that are outside control of the project team. **Screenshot 1:** That is correct and the information below is accurate. Yes - the schedule as presented is what is anticipated. Further project development and advancement of right of way acquisition follows the environmental review. If additional environmental review is needed, the schedule would be adjusted and the website would be updated. This is standard project development. **Screenshot 2**: See response above. All schedules do not have to be shared in the same format. The information is the same. **Screenshot 3:** See responses above.
147	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding closed-door decision-making, chilling of public participation, and fatal procedural defects related to the Joint County/City Transportation Committee for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Pattern of Closed-Door Decision-Making, Chilling of Public Participation, and Fatal Procedural Defects** Comment noted. There have been public meetings associated with the project, information has been posted on the project website, and regularly scheduled county board and city council meetings have shared information on the project and have allowed for public comment and input on the project. MEPA does not require public participation in every meeting that occurs. Preparation of an EAW under MEPA does not require early and often public participation. **EIS** The county board will determine if an EIS is needed under MEPA requirements.
148	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the removal of federal funding to avoid required noise mitigation and environmental obligations for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Dropping Federal Funding to Avoid Noise Mitigation** **Federal Funding was removed specifically to avoid noise mitigation** Federal funding was removed from this project and put on the Main Street project for multiple reasons as noted in the county's request to MnDOT State Aid to have the funding transferred (letter dated March 27, 2025). Reasons included: timing of funding - the county was concerned that the environmental document would not be completed and even if it was, there was not enough time to complete final design and right of way acquisition. Additional concerns regarding meeting the deadline included coordination with the railroad and opposition to the project from a neighborhood group. Delays would put the federal funding at risk, and the county wanted to utilize the federal funding. Main Street already had federal funding included and would meet the fiscal 2026 deadline. **Environmental Review Cannot be Structured to Avoid Mitigation** Reference to Statute 116d.04 is not applicable. The project is not an EIS. The project has not been structured to avoid an environmental review, the project is being reviewed under MEPA. Nothing has been segmented - the whole project is under review as is required by MEPA. An EAW under MEPA does not require an alternatives analysis. See above for reasons of removal of federal funding - which is allowed, regardless of the rationale. **Noise Impacts were not reduced** See responses above. As noted in Section 19 of the EAW, the county is exempt from state noise standards as the roadway is not fully access controlled. The county and city have considered state noise standards and have provided some options that would help screen adjacent homes from the roadway and provide some mitigation. Berming, trees and fencing options were presented at the open house and noted in the EAW. Other efforts were incorporated into the design to help reduce traffic speeds - including a design speed of 40 miles per hour, providing roundabouts at intersections near development to slow traffic, and using an urban design near developed areas. In addition, the design includes shifting the roadway to the east within the proposed right of way to provide more separation from homes and the roadway. A noise wall is not being considered as it is not required under state standards.
148						**Federal Action and Obligations Remained Unresolved** **- Whether Federal Permits would still apply** Federal permits do not require full federal environmental documents. The permits all have permitting requirements which the county will be required to meet in order to obtain them. Anticipated permits are included in the EAW (Section 9) and updated in the FOFC. **- Whether Federal "action" could still trigger federal noise requirements** See above. Noise evaluations under federal processes are not required for permits, only when funding for construction is used. **- Whether FHWA or MPCA concurrence had been obtained prior to dismissing noise obligations** FHWA has no need for concurrence. The MPCA does not provide concurrence - that is a federal action. MPCA will review a copy of the EAW and has the opportunity to provide comment on the information presented within. **An EIS is required** The County will determine if an EIS is needed under MEPA requirements.

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149	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding failure to analyze foreseeable safety impacts to children, pedestrians, and residents in close proximity to the proposed corridor for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Truck Percentages** Traffic studies included in the EAW are for annual average daily traffic, which is for all vehicles - cars, trucks, and buses. This is typical of most traffic studies unless there is a concern about abnormal truck traffic - i.e., areas near a port, industrial development, etc. that would require further investigation for roadway geometrics or other evaluations. The county had been looking at potential truck volumes when the project had federal funding, as the noise analysis includes a breakdown of vehicle type. The project is not federally funded and a federal noise analysis is not required. Additionally, when a roadway does not exist, best engineering practices are used to determine vehicle classification splits. These practices were discussed amongst team members to apply appropriate standards for the entire project. Please see Section 20 of the EAW and Attachment K which discuss traffic assumptions. **Distance of Roadway from existing homes** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway. **FONSI** See responses above **EIS** The county board will determine whether an EIS is needed under MEPA.
150	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the failure to adequately evaluate Alternatives 4 and 5 and the improper dismissal of avoidance-based options for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Predetermination and Premature Elimination of Alternatives 4 and 5** Preparation of an EAW does not require an alternatives analysis under MEPA. **EIS** The county board will determine whether an EIS is needed in accordance with MEPA requirements.
151	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding farmland impacts, inadequate cumulative analysis, and federal noncompliance under MEPA, NEPA, and the Farmland Protection Policy Act for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Legal Deficiency of Farmland Impact Analysis and Federal Noncompliance (MEPA, NEPA, FPPA)** The proposed project does not have federal funding and is not subject to federal farmland analysis (FPPA and Form AD-1006). Please refer to response to Comment 28 regarding federal funding for the project and that it is no longer a federal undertaking Comments 248 and 249. Avoidance measures are not required. Section 10 of the EAW includes information on land use, including farmland. MEPA requirements regarding land use include: Describing land use of the site as well as areas adjacent to and near the site (project). The EAW notes the presence of farmlands and includes a description of the farmlands impact. Further, Section 10 requires the EAW preparer to note future/planned land uses, for which the farmland is identified as future development/urbanization. The EAW denotes direct and indirect impacts. The EAW also notes it is subject to review by the Minnesota Department of Agriculture (MDA) regarding farmland impacts as over 10 acres are impacted. Additionally Section 21 of the EAW indicates that future conversion of farmland will occur as the community continues to develop. Timing of this impact is unknown. During final design, the county will work with property owners regarding tiling and potential drainage impacts. This is part of advancing the design. They will also discuss access to fields and adjust slopes as needed. Other items listed in the comment are not required to be evaluated.
152	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding improper manipulation of federal funding, predetermination of project outcomes, and chilling of public participation for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Improper Federal Funding Manipulation, Predetermination, and Chilling of Public Participation** The county is allowed to remove federal funding from projects. They submitted a letter to MnDOT State Aid and outlined their rationale for doing so. See response to Comment 28. State Aid reviewed the request and transferred the funds to the Main Street project. At that point the project was no longer under federal review.

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153	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the functional coupling of the 18th Street railroad roundabout and the East Side Corridor and the resulting improper segmentation for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Public Comment - Coupling of the 18th Street Roundabout and the East Side Corridor** The roundabout was constructed for safety and operational reasons by the high school. As noted in the correspondence, the county did not know if the east side corridor was going to happen. They discussed with the railroad and MnDOT rail officials if they should include the potential future east side corridor as part of their diagnostic (which determines the need for gates and signals at the railroad crossing). Hence the discussion around "de coupling". At that time the county had received funding for a potential east side corridor, but no preferred alternative was considered. Just because the two projects existed, it does not mean they lack independent utility. The roundabout was needed for safety reasons by the high school and the need for the east side corridor was documented in the purpose and need for the EAW (Section 6), which identifies a lack of north-south continuity, traffic being forced to go through the downtown, and traffic going through neighborhood streets rather than on collector and arterial roadways. Just because the projects were in the same geographic area, it does not mean that one project induced the other, that one project was a prerequisite for the other, or that neither project is justified by itself. The two projects are not considered connected actions under MEPA.
154	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding the failure to maintain independent environmental review due to concentration of consultant roles for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Failure to Maintain Independent Environmental Review and Consultant Role Separation** **Lack of Independent Environmental Review Due to Concentration of Consultant** Comment noted. Consultants routinely perform this type of work to assist local agencies in developing projects for construction. This does not alleviate the county of its responsibilities. **Concentration of Consultant Roles** Comment noted. See response above. **Impact on Environmental Review Integrity** See responses to Comments 57, 58, 61. Please note, MEPA does not require an EAW to evaluate multiple alternatives. **Public Confidence and Appearance of Predetermination** Please note, MEPA does not require an EAW to evaluate multiple alternatives. See responses above. **Request** Comment noted. The county board will determine if an EIS is needed under MEPA.
155	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding loss, destruction, and inaccessibility of public data that materially impaired meaningful public participation for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**EAW Comment - Loss, Destruction, and Inaccessibility of Public Data Impairing Meaningful Participation** Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA. The commentor has had access to the EAW since it was published in the EQB monitor.
156	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding manipulated and inconsistently applied truck traffic and noise assumptions for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Manipulation and Inconsistent Application of Truck Traffic and Noise Assumptions in the ESC Environmental Review** Please see response to Comments 20 and 28, 248 and 249 regarding federal funding and noise. Federal processes for noise evaluation are not required. The project is under MEPA. As noted in Section 19 of the EAW, the roadway is exempt from state noise standards as it is not a fully accessed controlled roadway. However, the county acknowledged the change in use next to residents and took measures to lessen noise impacts. See response to Comment 156 for additional details. **Proximity to Homes** Comment noted. See response above **Truck Traffic Percentages** Comment noted. See response above. Additionally, when a roadway does not exist, best engineering practices are used to determine vehicle classification splits. These practices were discussed amongst team members to apply appropriate standards for the entire project. **Worst Case Modeling** See response above **Impacts Were Known to Be Severe** See response above **MEPA and NEPA Require Honest evaluation - Not Outcome-Driven Modeling** See responses above. **Conclusion** See responses above.. The county board will determine whether an EIS is needed under MEPA requirements.

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157	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding manipulation of noise mitigation analysis and the environmental review process for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Manipulation of Noise Analysis and Environmental Review Process for the ESC** Please see response to Comments 28, 248 and 249 regarding federal funding. Because there is no federal funding, sequencing - avoid, minimize, mitigation is not required. Avoidance of any environmental impact is virtually impossible - something is going to be impacted and then minimization and/or mitigation measures are applied. When the project had federal funding it went through the sequencing process, which was reviewed and approved by FHWA in the final alternatives analysis. Comments submitted on the comment were based on preliminary drafts of the analysis and provided guidance on how to approach the evaluation and write-up. The EAW includes the required information on noise under state requirements. The project is exempt from state noise standards as the roadway is owned by a county and it is not a fully access controlled roadway. The county acknowledges the change in condition for residents and had incorporated design elements to lessen noise impacts. Measures have included lowering the design speed, shifting the roadway to the east within the proposed right of way, incorporating roundabouts to slow travel speeds, and using an urban design. The county has also offered buffering and screening homes from the roadway, including berming, fencing, and landscaping. **Noise Impacts Were Treaded as Conditional Rather Than Inherent** See comments above **Noise Mitigation was Used to Influence Alternative Selection** The project does not have federal funding and an alternatives analysis to select the preferred alternative is not required.
157						**Voting Was Improperly Positioned as a Gatekeeper for Mitigation** See comments above. Voting on a noise wall will only occur for a preferred alternative under NEPA. The commentor does not understand the federal process. **Federal Funding Was Treated as a Means to Avoid Mitigation Obligations.** Please see response to Comment 28. There were multiple reasons for removing federal funding. Federal funding has been removed. **Withholding of Information Prevented Meaningful Public Participation** Every project development and decision are not required to be published or shared with the public. As noted, under MEPA an alternatives analysis is not required so the comment is not applicable. **Conclusion** See responses above.
158	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding manipulation of noise mitigation analysis and the environmental review process for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	See response to Comment 157.
159	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding noise impacts to children, educational outcomes, and future school property adjacent to the proposed corridor for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Noise Impacts to Children and Educational Outcomes Near Future Elementary School Property** Please see response to Comments 20 and 28 regarding federal funding and noise. Also note - that even if the project were required to do a detailed noise analysis, future construction of a school would not be considered. It would have to be a project for which a development permit had been pulled and construction on the school was being built.
160	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding permanent health, safety, and environmental impacts to existing homes due to extreme proximity of the proposed corridor for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Permanent Health, Safety, And Environmental impacts to Existing Homes** - The proposed route is not an arterial route, it is a 40 mile per hour collector roadway. - Typical right of way for a two-lane roadway can vary between approximately 66 feet and to whatever the jurisdictional agency is needed to accommodate the roadway and supporting infrastructure such as trails, drainage, traffic control, etc. As a comparison, Rose St, which is nearby has a right of way width of approximately 90 feet. - Right of way between the proposed project and 2 homes in the North Country neighborhood is approximately 17 feet. The roadway itself is approximately 65 - 70 feet away from the homes, as the county shifted the roadway to the east and used an urban design to minimize the footprint of the roadway and to provide greater separation between homes. Most of the remaining homes along the proposed roadway are over 100 feet from the roadway. - Section 12 of the EAW documents noise regarding the project. The project is exempt from state noise standards as the roadway is not a fully access controlled highway. However, the county took measures to shift the roadway and minimize its footprint. The county lowered the design speed to 40 miles per hour, included roundabouts to slow traffic, shifted the roadway to the east to within the right of way to provide greater separation between the homes and roadways, and used an urban design to minimize the roadway footprint and to slow travel speeds near developed are. The county also offered additional screening and buffering with berming, landscaping and fencing. - MEPA does not require sequencing - avoidance, minimization and mitigation. - Please note the project is not subject to NEPA requirements. See response to Comment 28, 248 and 249. - Please refer to Section 21 of the EAW regarding cumulative impacts. - Please refer to response to Comment 37 regarding Environmental Justice. - Please refer to Sections 17 and 18 of the EAW regarding air quality and greenhouse gas emissions. - EIS - the county board will determine a need for an EIS in accordance with MEPA guidance.

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161	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding predetermination and misrepresentation of project alternatives prior to meaningful public engagement for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Predetermination and Misrepresentation of Alternatives** Under MEPA, an EAW is not required to include an alternatives analysis. It needs to describe the purpose and need for a project and provide a description of the project. An alternatives analysis is required for some federally-funded projects. At one point the project had federal funding and an alternatives analysis was required and completed. It had received concurrence from FHWA when it had federal funding. At the May 31, 2023, open house, the county provided its preliminary analysis and shared its recommended/preferred alternative to the public for input and feedback. It also shared the other alignments under consideration and how the alternatives faired in the evaluation. Meeting attendees were informed that the analysis needed to be reviewed and approved by FHWA before being finalized. Feedback from the open house meeting as well as the meeting on May 26 with residents of the North Country neighborhood as well as input from the May 31, 2023 open house were used to help define the alternative that received official concurrence in September 2024. Please note, at this time, the project was under NEPA review.
162	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding predetermination and prejudicing of alternatives through implementation-level actions taken during ongoing environmental review for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Predetermination and Prejudicing of Alternatives - Minn R 4410.3100** Minn Rules 4410.3100 does not refer to design work or planning efforts for right of way acquisition. Minn Rules states: 4410.3100 PROHIBITION ON FINAL GOVERNMENTAL DECISIONS. §Subpart 1. Prohibitions. If an EAW or EIS is required for a governmental action under parts 4410.0200 to 4410.6500, or if a petition for an EAW is filed under part 4410.1100 that complies with the requirements of subparts 1 and 2 of that part, a project may not be started and a final governmental decision may not be made to grant a permit, approve a project, or begin a project, until: A. a petition for an EAW is dismissed; B. a negative declaration on the need for an EIS is issued; C. an EIS is determined adequate; or D. a variance is granted under subparts 3 to 7 or the action is an emergency under subpart 8. To start or begin a project includes taking any action within the meaning of "construction," as defined in part 4410.0200, subpart 10. 4410.0200 - subpart 10 states: Subp. 10. Construction. "Construction" means any activity that directly alters the environment. It includes preparation of land or fabrication of facilities. It does not include surveying or mapping. Minn 4410.3100 PROHIBIITION ON FINAL GOVERNMENTAL DECISIONS §Subp. 2. Public projects, prohibitions. If a project subject to review under parts 4410.0200 to 4410.6500 is proposed to be carried out or sponsored by a governmental unit, the governmental unit shall not take any action with respect to the project, including the acquisition of property, if the action will prejudice the ultimate decision on the project, until a petition has been dismissed, a negative declaration has been issued, or until the final EIS has been determined adequate by the RGU or the EQB, unless the project is an emergency under subpart 9 or a variance is granted under subparts 4 to 8. An action prejudices the ultimate decision on a project if it tends to determine subsequent development or to limit alternatives or mitigative measures.
162						**Improper Predetermination and Prejudicing of Alternatives** The rule is referring to actually purchasing right of way or starting a construction project. It does not limit the county's ability to secure contracts for furthering design or for preparing for right of way acquisition. **Approval of a Preferred Option Before Completion of Environmental Review** An EAW under MEPA does not have to evaluate other alternatives. Even under federal NEPA requirements, a preferred alternative is allowed to be identified to complete environmental review and advance design. You don't have to have an approved document to advance design and right of way activities associated with title work, appraisals, review appraisals, etc. Activities in a contract do not violate Minn Rules 4410.3100. **Authorization of Implementation Level Design and Right of Way Work** See comments above **Mitigation-Driven Re-Analysis Demonstrates Predetermination** See comments above about MEPA requirements regarding an alternatives analysis. Citation of 4410.3100 is not applicable to this comment.
162						**Timing and Procedural Irregularity** See comments above. **County Proceeded Despite Advance Warning from Residents** See comments above **Compounding Actions That Improperly Limited Alternatives** See comments above. Non-RGU entities are allowed to provide comment during the public comment period, just like any other agency or the public. As noted in other responses to comments, the Township Resolution was included in the EAW section 10 on land use as it was tied to discussions regarding the orderly annexation that had been in place for years. **Consequences** See comments above

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163	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding professional review obligations and continuity of environmental review during staff transition for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Professional Review Obligations During Staff Transitions:** Please see response to Comment 201. Ronald Gains was on staff since August 2025. A full independent review of the document is not required.
164	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding scope creep, phased segmentation, and deferred disclosure of reasonably foreseeable project components for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Improper Segmentation and Scope Creep Within the East Side Corridor Project** **Major Elements** The EAW is required to include a description of the project. Project elements such as a bridge over Maple Creek, railroad crossings, right of way acquisition would be included in any alternative selected and as a part of project development. As additional information from environmental investigations and feedback from the public was received, modifications to the proposed concept were made. For example, roundabouts were included to help slow traffic speeds near developed neighborhoods and an urban design near developed areas was included to reduce the roadway footprint and to provide more space between homes and the proposed roadway. This is typical of the design process to include modifications as information is learned and public input is provided. The EAW, for which there are 30 days to review and respond to the project, included a layout and description of the improvements. Under MEPA, the EAW requires the project to establish a purpose and need (Section 6 which identifies existing transportation problems and needs). The EAW is also required to disclose a full description of the project (Section 6 which describes improvements including new alignments, roadway extensions and realignments, reconstruction of portions of routes, and paving of gravel roads). The EAW for the east side corridor does this. Neither the MEPA nor NEPA process require feedback and input on every design decision. Preparation of an EAW under MEPA does not require public input until the document is complete and the official 30-day public/agency comment period is noticed. Please note, the county did include multiple opportunities for engagement. Please also note the east side corridor is proposed as a collector roadway, not an arterial.
164						**Costs/CIP Information** Please see response to Comment 189 regarding changes in scope and magnitude. CIP notes are exactly that - planning notes to describe what the project could entail, what it could cost, and when it would be built. Steele County proposes to build what is included in the environmental document with mitigation as needed for state and/or federal permits. There is no segmentation - no future elements. **Segmentation of Work** The EAW is presenting what will be built. There is no planned expansion of the proposed roadway or future phases that are anticipated to be built. That would have to be disclosed as part of the document. Incorporating elements during preliminary design is standard and is to be responsive to public input, studies and information gathered as part of the project development process. All the items identified in the comment were included and described in the EAW that was provided to the public for comment.
165	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding suppression of noise impact discussion and discouragement of mitigation during public engagement for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Suppression of Noise Impact Discussion and Mitigation** **Noise Concerns:** See response to Comment 166. **Sequencing** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required.
166	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding unreliable traffic data and shifting truck percentage assumptions used in impact analysis for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Suppression of Noise Impact Discussion and Mitigation** **Noise Concerns:** The project does not have federal funding and a federal noise analysis is not required. The county is exempt from state noise standards as noted in the EAW. It did look at mitigation to reduce the impact of noise on adjacent homes by slowing traffic (design speed of 40 mph, urban section that has a smaller roadway footprint, including roundabouts at intersections near developed areas to slow travel speeds, shifting the roadway to the east in urban areas to provide better separation between the road and homes, and asked for input on berming, landscaping and fencing measures. Please refer to responses to Comments 28, 248 and 249. **Traffic Volumes and Truck Percentages:** Please see response to Comment 220 regarding traffic and truck traffic.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
167	12/31/2025	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	Please accept the attached PDF as my formal written comment regarding failure to apply avoidance and the withholding of a reasonable avoidance alternative for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Fatal Flaw in Environmental Review - Failure to Apply Avoidance and Withholding of a Reasonable Alternative - Known Impacts and Withholding of a Reasonable Alternative** Please see response to comments 28, 248 and 249. The project does not have federal funding and is not a federal undertaking. Sequencing - Avoid, Minimize, Mitigate is a federal process. Under MEPA, an EAW is prepared to disclose impacts of the proposed project. Other alternatives do not need to be included or evaluated. **Known Impacts and Failure to Implement Avoidance** See above. **Unequal Application of Impacts Across Alternatives** Preparation of an EAW under MEPA does not require an alternatives analysis.
167						**Improper Sequencing and Withheld Impact Data** See above regarding sequencing and federal funding. **Withholding of a Reasonable Avoidance Alternative** See above. **Notice to Elected Officials** Comment noted. **Fatal Flaw** The county will determine if an EIS is needed under MEPA requirements
168	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		Please accept the attached PDF as a formal written group comment submitted on behalf of East Side Corridor residents for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. This submission documents that no new substantive data was provided during the EAW comment period, that previously reviewed records were lost, altered, or rendered unverifiable while in County custody, and that residents were denied access to the software necessary to inspect public data in usable native formats during the comment window. Residents relied on shared access to this data within our community to prepare informed comments. Only after County offices were closed at the end of the comment period did the County indicate it could provide the software required for meaningful inspection. Requests for a pause, extension, or corrective action were not granted, materially impairing meaningful public participation during the EAW process. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Lack of Data Access** Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA.
169	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “003.FloodplainImpactAnalysis.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	Formal Objection to Incomplete EAW, Withholding of Critical Floodplain and Bridge Risk Data, and Unlawful Consideration of a FONSI **NEPA** The project does not have federal funding and NEPA does not apply. Please see responses to Comments 28, 248, and 249. **Required Floodplain and Bridge Risk Assessment Data is Missing from EAW:** Section 12 of the EAW includes information on floodplain analysis and risk assessment and document additional work that will be completed as design progresses. Attachment D has information from the modeling. Final design and permitting will require all impact to the floodplain is appropriately mitigated. Section 12 summarizes the coordination with DNR. If a no rise is obtained, a LOMR and CLOMR are not required. If it is not feasible to create a no-rise condition with design refinements, a LOMR and/or CLOMR will be submitted. Both the LOMR and CLOMR would require impacted property owners to indicate they are agreeable to the change in floodplain elevation. **Withholding of Critical Technical Information Denies Meaningful Public Participation:** See response above. **A FONSI Cannot be Lawfully Issued on an Incomplete or Withheld Record:** See response above. **Failure to Fully Evaluate Reasonable Alternatives Further Triggers the Need for an EIS:** See response above. **Conclusion and Required Action:** See response above.
170	12/31/2025	Annie Muir	anniemuir12@gmail.com		Steele County prematurely eliminated alternatives for the East Side Corridor that would have avoided significant environmental impacts in favor of a predetermined route driven by (suspicious?) development rather than transportation needs, while omitting the true scope and impacts of the project from the EAW; therefore, a full independent Environmental Impact Statement (EIS) is required.	Please refer to the response to Comment 1 regarding the purpose and need for the project. MEPA does not require an alternatives analysis for an EAW.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
171	12/31/2025	Sara Quiggle	sara.quiggle@yahoo.com		Good afternoon, Regarding the Owatonna East Side Corridor. The project record demonstrates predetermination as defined under Minn. R. 4410.3100. Before the East Side Corridor project was publicly announced or subjected to environmental review, the County and its consultant had already taken multiple irreversible actions, including but not limited to: selecting WSB as the project consultant, estimating construction costs, designing intersections, mapping and naming a specific corridor (29th Avenue), and programming the project into multiple Capital Improvement Plans. County planning documents further describe the corridor location as having been “strategically chosen,” indicating that the alignment decision preceded environmental analysis. Environmental review is intended to inform decision-making, not to justify decisions that have already been made. When a specific project location is effectively selected prior to completion of environmental review and before meaningful public participation occurs, the integrity of the environmental process is undermined. Because the record shows that key decisions were made prior to environmental review, the EAW fails to provide an objective evaluation of reasonable alternatives as required under MEPA. This constitutes predetermination and necessitates preparation of an Environmental Impact Statement (EIS) to ensure full disclosure of impacts, genuine alternatives analysis, and meaningful public participation before any final decisions are made.	See comment response to Comment 173. Minn Rules 4410.3100 is not applicable to an EAW.
172	12/31/2025	Tyrel Alastair Hunter	ialastairhunter@me.com		Before the East Side Corridor project was publicly announced or subjected to environmental review, the County and its consultant had already taken multiple irreversible actions, including but not limited to: selecting WSB as the project consultant, estimating construction costs, designing intersections, mapping and naming a specific corridor (29th Avenue), and programming the project into multiple Capital Improvement Plans. County planning documents further describe the corridor location as having been “strategically chosen,” indicating that the alignment decision preceded environmental analysis. Environmental review is intended to inform decision-making, not to justify decisions that have already been made. When a specific project location is effectively selected prior to completion of environmental review and before meaningful public participation occurs, the integrity of the environmental process is undermined. Because the record shows that key decisions were made prior to environmental review, the EAW fails to provide an objective evaluation of reasonable alternatives as required under MEPA. This constitutes predetermination and necessitates preparation of an Environmental Impact Statement (EIS) to ensure full disclosure of impacts, genuine alternatives analysis, and meaningful public participation before any final decisions are made.	See comment response to Comment 173.
173	12/31/2025	Susan Mullenbach	dsmully@msn.com		Before the East Side Corridor project was publicly announced or subjected to environmental review, the County and its consultant had already taken multiple irreversible actions, including but not limited to: selecting WSB as the project consultant, estimating construction costs, designing intersections, mapping and naming a specific corridor (29th Avenue), and programming the project into multiple Capital Improvement Plans. County planning documents further describe the corridor location as having been “strategically chosen,” indicating that the alignment decision preceded environmental analysis. Environmental review is intended to inform decision-making, not to justify decisions that have already been made. When a specific project location is effectively selected prior to completion of environmental review and before meaningful public participation occurs, the integrity of the environmental process is undermined. Because the record shows that key decisions were made prior to environmental review, the EAW fails to provide an objective evaluation of reasonable alternatives as required under MEPA. This constitutes predetermination and necessitates preparation of an Environmental Impact Statement (EIS) to ensure full disclosure of impacts, genuine alternatives analysis, and meaningful public participation before any final decisions.	The EAW is the environmental review. It is used to document impacts associated with a project. The county completed a purpose and need statement outlining the need for the project as well as an alternatives analysis to determine the preferred alternative. The county could not rely on previous planning efforts to determine the preferred alternative. Please refer to the response to Comment 1 regarding the need for the project and the evaluation of alternatives.
174	12/31/2025	Becky Dawley	becky_dawley@hotmail.com	960 Countryview Ave	Public participation in the ESC review was inadequate. Notices were late, key documents withheld from the public, and residents were denied the opportunity to comment after approval of the purpose, need, and preferred alternative. The public process was fundamentally flawed: •Only two days' notice for the first open house •Notice of the EAW comment period was received two weeks late •RFPs were signed before public disclosure •RFPs and study data were withheld from public access •A 61 page federal memorandum was kept from residents •Residents were denied a comment period after approval of purpose, need, and preferred alternative on 9/24/2024 These actions denied residents the opportunity to correct inaccuracies before information was submitted to state and federal agencies. I formally request that Steele County require a full Environmental Impact Statement (EIS) with independent oversight for the East Side Corridor project. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives and must be supported by substantial evidence in the record. That standard is not met here.	**Public Participation Inadequate** Under MEPA, an EAW is to allow for and provide opportunities for public comment during the official public comment period. Steele County provided additional opportunities for public input during the project development process. Other opportunities for public involvement were not required. **Two Days Notice:** A press release was published two days in advance of the meeting. However, Steele County also sent post cards to property owners located within and near the project area. Those postcards were mailed in advance of the meeting. The notice also included information that was posted on the project's website. **EAW Notice** See response to Comment 236 regarding the notice of the availability of the EAW. **RFPs Signed Ahead of Disclosure** Comment noted - nothing to do with the EAW, its development or information contained within it. **RFPs and Data Withheld** The EAW contains all the information needed for its preparation in compliance with MEPA, either within the body of the document or its attachments. The Findings of Fact and Conclusions provides supplemental data.

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174						**61-page Federal Memorandum** Memo is no longer needed/valid. The project is not a federal undertaking as it has no federal funding for construction. Please see responses to Comments 28, 248 and 249 **Denied a Comment Period** A comment period was not required. **EIS** The county board will determine the need for an EIS consistent with MEPA requirements. **FONSI** Comment noted.
175	12/30/2025	Alicia Pichner	alicia.martin307@gmail.com	2183 SE 24th Ave	I am submitting this comment to formally oppose the East Side Corridor project as currently scoped and advanced, including the proposed alignment through our farmland (including one of our best-producing fields and the addition of stormwater features (including two proposed retention/retainment ponds) in productive acreage. I want to be clear: a new road is already a major permanent taking and long-term burden. Adding a rural multi-use walking path—with the associated curb, gutter, storm drain infrastructure and maintenance obligations—turns a bad project into a fiscally irresponsible one. I'm asking you to stop treating the trail component like an unquestionable default, and to stop asserting public demand without producing proof. 1) The project's own materials show an expensive scope—yet critical justification remains vague. Your Highway Capital Improvement Plan (CIP) identifies the East Side Corridor as a new north–south route approximately 5 miles long and explicitly states that "a multi-use trail will also be constructed along side the route." The same CIP section indicates total project costs of approximately $23,743,984 (with $20,000,000 shown for construction, plus right-of-way, utilities, and engineering). That is an enormous expenditure to push forward while relying on broad, unquantified statements about "connectivity" and "downtown traffic" and while the public is still being asked to react to documents rather than a truly transparent, data-grounded case. 2) The "people want it" claim—especially for the trail—is not an acceptable basis for adding millions in scope. At a county meeting I attended, the justification for the walking path was summarized as "the people want it," without substantiating evidence, a defined population ("which people?"), or a demonstrated need that outweighs the cost and impact of running a path through rural farmland. If the trail is truly demanded and truly justified, then show it—with: • Statistically valid survey methodology (sample size, sampling frame, response rate, margin of error), • Who was surveyed (city residents vs township residents vs impacted landowners), • What exact question was asked (wording matters), • And whether respondents were told the full cost implications and the farm/land impacts of routing it through prime ground. Absent that, "people want it" reads as a convenient talking point used to justify a pre-selected wish list rather than responsible public infrastructure planning.	**Oppose Project as Scoped** Comment noted. **Trail** See response to Comment 7 - identifying the trail as a secondary need as documented in Section 6 of the EAW. In addition, it is consistent with city plans for walking and biking facilities as noted in Section 10 of the EAW. **1- Project Shows Expensive Scope** See above regarding purpose and need for the project - including the trail as noted in the response to Comment 7. **2 - People Want it** See above regarding purpose and need. Comments received on the EAW do indicate support for a trail.
175					3) The rural multi-use trail is scope creep with major cost multipliers and long-term liabilities. Your own CIP indicates the trail is part of the corridor build. But a trail along a rural road is not a strip of pavement "for free." It commonly drives additional: • Curb and gutter, • Storm sewer / drainage structures, • More right-of-way width and grading, • More crossings and signage, • More ongoing maintenance and liability exposure. This is precisely the kind of "nice-to-have" add-on that becomes a multi-million-dollar multiplier—and then becomes a permanent maintenance commitment (snow, surface repair, vegetation, drainage, signage, and safety). If the County/City believes a trail is a priority, then it should be evaluated as its own project, with its own demand study, cost estimate, funding plan, and routing alternatives—not stapled onto a rural roadway build and treated as inevitable.	**3- Scope Creep** Comment noted. See above and response to Comment 7.

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175					4) Taking productive farmland (and adding ponds within it) imposes real, permanent economic harm that is not being treated seriously. This corridor cuts through high-performing ground. A road is not simply "land removed from production." It creates: •Permanent field fragmentation (lost efficiency, more turns, smaller passes), •Damage to tile system and tile main •Compaction and drainage side-effects from construction, •Access and equipment maneuverability constraints, •Increased risk of trespass and nuisance impacts, •And the long-run loss of flexibility in cropping and conservation practices. Adding two stormwater ponds in the same field compounds the damage: more acres taken out of production, more disruption to existing drainage patterns, and more uncertainty about future maintenance and sediment management responsibilities. If stormwater treatment is necessary, it should be sited and designed to minimize destruction of prime agricultural ground, not defaulted into the middle of some of the most productive acres simply because it is convenient on a plan sheet. 5) The County's own project schedule and "official map" history do not justify pushing today's residents and landowners into a bad decision. Your Highway "Future Projects & Studies" page describes the East Side Corridor's stated purpose (north–south connection, diverting downtown traffic) and references historical mapping going back to 1999–2000. But a decades-old "official map" is not a substitute for a current, defensible, data-driven project scope—especially when costs are now in the tens of millions and when the project adds expensive non-road components like a multi-use trail. 6) The comment period must result in real scope changes—not a box-check. The County's public notice confirms the EAW comment period (Nov 18 to Dec 31, 2025) and the associated open house and comment channels. If this process is meaningful, you should be willing to make substantive changes based on comments—especially from directly impacted landowners and taxpayers.	**4- Productive Farmland - Pond Use** Stormwater management, specifically water quality treatment, is required by the National Pollutant Discharge Elimination System NPDES Construction General Permit that is administered by the MPCA in Minnesota for any project that exceeds 1 acre in new impervious. This is a national permitting requirement. Water quality Best Management Practice (BMP) types are determined by the soil conditions, groundwater proximity, and several other factors. The preferred method for achieving the permit requirement is infiltration of its viable. The EAW does denote impacts to farmland in Section 10. The project does impact approximately 62 acres of farmland. The county will work with impacted property owners to address tiling/drainage concerns that can be addressed as the design progresses. Right of way acquisition processes will address mitigation and compensation. **5 - Schedule and Official Map** Please refer to Section 6 of the EAW which describes the transportation needs for a new north-south roadway connection. Information on the project website was done to show the history of studies in the area and for the different transportation issues that had been considered over time. **6 - Comments Must Result in Change** The county will be considering the comments provided.
175					What I am asking you to do (specific actions) 1.Remove the multi-use trail from the East Side Corridor project scope and evaluate it separately with a documented demand study and transparent cost breakdown. (Your CIP already states the trail is included; that is exactly why it must be scrutinized.) Revize+1 2.Publish a line-item cost estimate that separates: roadway, right-of-way, utilities, stormwater, trail, curb/gutter, storm sewer, and long-term maintenance assumptions—so taxpayers can see what is being added and why. 3.Provide the evidence behind claims of public support ("the people want it"), especially for the trail: survey data, meeting input summaries with counts, and documentation of how input altered the design. 4.Require alternative alignments and/or design solutions that minimize prime-farmland takings and avoid placing stormwater ponds in top-producing acres unless there is no feasible alternative. 5.Commit to a standard that rural add-ons must meet: necessity first, not "nice-to-have." If it cannot be justified with clear need and benefit relative to cost and harm, it does not belong in the project. Closing This project—especially with a multi-use trail attached—reads as expensive, loosely justified, and poorly disciplined in scope. A road already creates permanent damage to productive farmland; adding ponds and a "walking path because people want it" escalates the harm and the cost while the underlying justification remains frustratingly vague. I respectfully request that you treat this comment as formal opposition and that you respond with: •Whether the trail can be removed from scope, •How public demand has been measured, •And how you will mitigate the permanent economic harm to our farm ground	**Asks** The county will be considering the comments provided. **Closing** Comment noted. See responses above.
176	12/30/2025	Cassandra Kohn	cj.kohn2010@gmail.com		The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios;	See responses to Comments 20, 28, 195, 248, 249. Sequencing - Avoid, Minimize and Mitigate is a federal NEPA requirement, not a MEPA requirement.

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176					Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project's noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	
177	12/29/2025	Annie Fischer	abaker615@gmail.com		The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios;	See responses to Comments 20, 28, 195, 248, 249. Sequencing - Avoid, Minimize and Mitigate is a federal NEPA requirement, not a MEPA requirement.
177					Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project's noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	

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178	12/31/2025	Annie Muir	anniemuir12@gmail.com		The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios;	See responses to Comments 20, 28, 195, 248, 249. Sequencing - Avoid, Minimize and Mitigate is a federal NEPA requirement, not a MEPA requirement.
178					Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website. As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County’s consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	
179	12/30/2025	Adam Worke	akworke@gmail.com		The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios;	See responses to Comments 20, 28, 195, 248, 249. Sequencing - Avoid, Minimize and Mitigate is a federal NEPA requirement, not a MEPA requirement.

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179					Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project's noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	
180	12/30/2025	Scott Klecker	scott.klecker@veitusa.com		The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios;	See responses to Comments 20, 28, 195, 248, 249. Sequencing - Avoid, Minimize and Mitigate is a federal NEPA requirement, not a MEPA requirement.
180					Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website. As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project's noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	

Comment	Date Received	Name	Email	Address	Comment	Comment Response
181	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	Request for Immediate Project Pause Due to Ongoing Data Access Violations and Noncompliance with MEPA Public Participation Standards Meaningful public participation is a foundational requirement of the Minnesota Environmental Policy Act (MEPA). Under Minnesota Rules part 4410.0200, subpart 23, environmental review is intended to ensure that environmental effects are fully disclosed and considered before decisions are made and before irreversible commitments of resources occur. That purpose cannot be achieved where the public lacks access to critical project information. At present, residents still do not have full access to public data related to the East Side Corridor (ESC) project that has been requested from Steele County. This ongoing lack of access materially impairs the public's ability to evaluate project impacts and to submit informed and substantive comments on the Environmental Assessment Worksheet (EAW). On November 24th, 2025, a determination was issued against the County in a Minnesota Department of Administration Data Practices proceeding, finding multiple violations of Minnesota Statutes Chapter 13, including failures related to timely and appropriate access to public data. Despite this active data practices matter, the County proceeded to open the EAW public comment period on November 18th, while the hearing process was still unresolved. Proceeding with environmental review under these circumstances conflicts with Minn. R. 4410.1700, which requires that environmental review be based on accurate, complete, and available information sufficient to determine the potential for significant environmental effects. When requested public data is unavailable due to unresolved statutory violations, the EAW process cannot reasonably be said to provide the public with a meaningful opportunity to participate or to inform decision-makers.	**Minnesota Rules 4410.0200:** Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA **Access to public data:** See response to Comment 190. **Minn Rules 4410.1700:** Information included in the EAW is responsive to state requirements. Accurate, complete and available data is provided and additional clarifications have been included in the FOFC. The county board will be making a determination whether an environmental impact statement is needed.
181					Further, Minn. R. 4410.0200 emphasizes that environmental review must be conducted in a manner that fosters transparency, public confidence, and informed governmental decision-making. Opening and conducting an EAW comment period while access to key project data remains unlawfully restricted undermines these objectives and compromises the procedural integrity of the review process. Accordingly, an immediate pause in further advancement of the East Side Corridor project is warranted until: -All outstanding public data requests related to the project are fully satisfied; -Compliance with Minnesota Statutes Chapter 13 is restored and documented; and -The public is afforded a meaningful opportunity to review and comment on a complete and accessible project record. Absent these corrective actions, continuation of the EAW process is inconsistent with MEPA standards and risks rendering subsequent environmental determinations procedurally deficient	Minnesota Rules 4410.0200: Cited rules do not reflect the comments under them. See response to Comment 189 and above.
182	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	For the joint city–county East Side Corridor project, why did the City Council at the behest of the county, adopt a resolution selecting the 29th Avenue alignment at its December City Council meeting before the close of the Environmental Assessment Worksheet (EAW) public comment period? Taking formal legislative action to select a specific alignment prior to completion of the EAW review and consideration of public comments creates the appearance that a preferred alternative was identified in advance of the environmental review. This action is inconsistent with the purpose of the EAW process, which is intended to inform decision-makers and the public before project commitments are made. Such premature action undermines the objectivity of the environmental review, limits meaningful public participation, and calls into question whether reasonable alternatives were fully and impartially evaluated. To ensure compliance with the intent of the Minnesota Environmental Policy Act (MEPA), preserve the integrity of the environmental review process, and restore public confidence in an unbiased decision-making framework, I formally request that this project be advanced to preparation of a full Environmental Impact Statement (EIS).	City Resolution The city of Owatonna chose to submit a resolution in support of the project. It was not at the county's behest. Please see response to Comment 232. See response to Comment 1. Under MEPA the purpose of the EAW is document impacts associated with the project - which was identified on 29th Ave. The public and agencies are to provide comment on the EAW and the information it contains.
183	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	The 29th Avenue alignment for the East Side Corridor was previously abandoned in the early 2000s and subsequently reduced in scope to a local road or city street. Residential development within the North Country neighborhood was approved and constructed based on that decision, with homes built ON 50 feet of the original 150-foot-wide 29th Street corridor. Reintroducing a highway-scale facility within this previously abandoned alignment represents a substantial change in project scope and context and creates significant land use, compatibility, and public health and safety concerns for existing residences. These impacts were not reasonably foreseeable at the time the neighborhood was developed and raise questions regarding the adequacy of an Environmental Assessment Worksheet (EAW) to fully evaluate them. Given the potential for significant adverse impacts to residential properties, neighborhood cohesion, noise, and human health and safety, I formally request that this project be advanced to preparation of a full Environmental Impact Statement (EIS) to ensure comprehensive analysis of impacts and alternatives consistent with the intent of the Minnesota Environmental Policy Act (MEPA).	**Reintroducing a Roadway** Comment noted. **EIS** The county board will be making a determination on whether an environmental impact statement will be needed in accordance with MEPA requirements.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
184	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	The land commonly referred to as the “outlots,” which form the eastern boundary of the North Country neighborhood and have also been identified as the “right-of-way” or “29th Avenue alignment,” was previously abandoned by both the City and County in 2013. This abandonment was formalized through City Council action on August 5, 2013. The property subsequently entered foreclosure, most recently in 2015. These documented actions appear inconsistent with the County’s repeated assertion that the 29th Avenue alignment “has always been the plan” for the East Side Corridor (ESC). If the alignment had remained the intended corridor, it is unclear why the right-of-way would have been formally abandoned and allowed to lapse into foreclosure. This discrepancy raises material questions regarding the project’s planning history, the accuracy of the project purpose and need statement, and whether the Environmental Assessment Worksheet (EAW) adequately reflects reasonable alternatives and prior decisions. Clarification of this record is necessary to ensure an accurate and transparent environmental review. As such, I formally request that this project be advanced to preparation of a full Environmental Impact Statement (EIS) to ensure comprehensive analysis of impacts and alternatives consistent with the intent of the Minnesota Environmental Policy Act (MEPA).	Comment noted. The purpose and need in the EAW identifies the transportation problems to be addressed, not whether a plat or plan exists. The county did prepare a history of transportation studies on the east side of Owatonna to provide context on previous work - some of which indicated a need for a more local north-south connection and some of which indicated a different/separate need for a beltway/beltline around the city. See Comment 1 regarding the need for an alternatives analysis. **EIS** The county board will be making a determination on whether an environmental impact statement will be needed in accordance with MEPA requirements.
185	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	The Environmental Assessment Worksheet (EAW) identifies the East Side Corridor project as a federal undertaking. Despite this designation, correspondence from the County Engineer with the consulting firm WSB and with State Aid indicates efforts to remove federal funding from the project in order to avoid application of federal noise analysis and mitigation requirements. These actions, when considered together with the absence of noise studies in the EAW, raise significant concerns regarding the completeness and adequacy of the environmental review. If the project remains a federal undertaking, the omission of required noise analysis is inconsistent with the level of review necessary to fully disclose potential impacts to affected residents. This situation creates uncertainty as to whether applicable federal standards have been appropriately considered and whether potential noise impacts have been fully evaluated and disclosed to the public. Given these unresolved issues and the potential for significant adverse impacts to residential areas, the EAW does not appear sufficient to support informed decision-making. Accordingly, advancement of the project to preparation of a full Environmental Impact Statement (EIS) is warranted.	The proposed project does not include federal funding. Information regarding federal funding regarding historic/cultural resources was inadvertently left in the document following the removal of federal funds. Please see responses to Comments 248, 249, 236 and 28.
186	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	Under the currently identified 29th Avenue alignment for the East Side Corridor, access to my permitted detached garage would be eliminated. This garage was properly permitted and constructed in reliance on representations by the City and County that curb and gutter improvements would be provided when a city street was built at this alignment (the East Side Corridor highway project had been abandoned at this alignment prior to the house and garage having been built). At the time of permitting, 29th Avenue was designated in the City of Owatonna’s Comprehensive Plan as a local city street. The current proposal to convert this corridor into a county highway represents a substantial change in roadway classification and function. This change would directly affect property access and raises questions regarding compatibility with prior land-use approvals and reliance interests of affected property owners. The Environmental Assessment Worksheet (EAW) does not adequately address how access to existing permitted structures would be maintained, nor does it identify feasible secondary access alternatives. Loss of access to a permitted structure constitutes a significant impact to property use and safety and warrants further analysis. Clarification is requested regarding how access to my detached garage will be preserved or replaced under the proposed alignment. Given the unresolved access, safety, and land-use impacts, I formally request that this project be advanced to preparation of a full Environmental Impact Statement (EIS).	As part of the right of way acquisition process, permits and/or agreements attached to properties will be reviewed. The county and/or its right of way agents will meet with the property owner to determine impacts and appropriate solutions which could include compensation or relocation. These efforts do not require an EIS to be prepared.
187	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	Request for Project Pause and Preparation of an Environmental Impact Statement (EIS): The Environmental Assessment Worksheet (EAW) omits analysis of noise impacts and other potentially significant environmental effects, including potential adverse health consequences for nearby residents. Under Minnesota Rules part 4410.1700, subp. 7, an EAW must provide sufficient information to determine whether a project has the potential for significant environmental effects. Given the absence of noise analysis, further advancement of the project should be paused until the required studies are completed and made available for public review. The project corridor includes multiple residential neighborhoods that constitute noise-sensitive receptors. Despite this, the EAW does not include a noise study or disclose anticipated noise levels, even though some residences are located as close as approximately 17 feet from the proposed roadway at its highest elevations. County engineering staff have acknowledged that this level of proximity is unprecedented within Steele County, indicating a potential for significant environmental effects under Minn. R. 4410.1700, subp. 7(B) and (C). In addition, noise analyses reportedly conducted by the project’s engineering consultant, WSB, are not included in the EAW or otherwise made available for public review. As stated in the EAW, the East Side Corridor project constitutes a federal undertaking. Federal highway projects are subject to the noise evaluation and mitigation requirements of 23 CFR Part 772 (FHWA Traffic Noise Regulations), which require identification of noise impacts and consideration of abatement measures prior to project approval. The omission of noise analysis raises material questions regarding compliance with applicable federal requirements and conflicts with the County’s assertion that federal noise guidelines and mitigation standards do not apply. These unresolved deficiencies prevent meaningful public participation and informed decision-making, contrary to the intent of Minn. R. 4410.0200 and 4410.1700. Given the potential for significant adverse noise and health impacts, the presence of residential receptors in close proximity to the proposed roadway, and the inadequacy of the current EAW to address these issues, preparation of a full Environmental Impact Statement (EIS) is warranted pursuant to Minn. R. 4410.1700, subp. 7 to ensure a comprehensive and unbiased environmental review.	**Minn Rules 4410.1700, sub 7** Information on noise was provided in the EAW and addressed according to state noise standards. Federal funding was not included for the project and it is not a federal undertaking. It does not need to comply with NEPA standards. See response to Comment 190. As required, the EAW includes information regarding health - specifically Air Quality and Greenhouse Gas emissions. Please refer to the document. **EIS** The county board will be making a determination on whether an environmental impact statement will be needed in accordance with MEPA requirements.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
188	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	Residents have identified multiple safety, noise, and land-use compatibility concerns related to the proximity of the proposed East Side Corridor (ESC) to existing homes, with some residences located as close as approximately 17 feet from the proposed roadway. Residential structures constructed along the 29th Avenue alignment were not designed or built to accommodate a highway-scale roadway of the type proposed for the ESC. These homes were approved and constructed based on land-use assumptions consistent with a local roadway, not a county highway or principal arterial. Noise mitigation strategies typically available during residential planning and construction—such as building setbacks, orientation, and structural attenuation measures identified in U.S. Department of Transportation Federal Highway Administration (FHWA) residential noise compatibility guidance—cannot be effectively implemented after homes are constructed. As a result, residents may be exposed to noise levels exceeding FHWA Noise Abatement Criteria for residential land uses. Noise analyses reportedly conducted by the project's engineering consultant, WSB, indicate that projected noise levels exceed actionable thresholds; however, these analyses are not included in the Environmental Assessment Worksheet (EAW). Given that the EAW identifies the ESC as a federal undertaking, the omission of this information prevents full disclosure of noise and safety impacts and undermines meaningful public participation. The close proximity of a highway-scale facility to existing residences, the inability to implement effective mitigation measures, and the absence of required noise analysis together indicate the potential for significant adverse environmental effects. Pursuant to Minnesota Rules part 4410.1700, subpart 7, the EAW is insufficient to support informed decision-making. Accordingly, preparation of a full Environmental Impact Statement (EIS) is warranted to ensure comprehensive evaluation of impacts, mitigation measures, and reasonable alternatives consistent with the intent of the Minnesota Environmental Policy Act (MEPA). How does the county respond to these concerns?	**Safety, Noise and Land-Use Compatibility** The proposed roadway is not 17 feet from existing homes. As noted - the proposed right of way is 17 feet from the closest home. The closest home is 65 feet from the roadway itself. A majority of homes in the referenced neighborhood are over 100 feet from the roadway. **Adjacent Homes** Comment noted. The proposed roadway is a collector route, not an arterial. Low speed design standards will be used and the roadway will be a two-lane facility. **Noise/Federal Standards** Please see comments 20 and 28 regarding federal funding and federal and state noise standards. The project is exempt from state noise standards as the roadway is not fully access controlled. The county did, however, take into adjacent land use and incorporated design changes to lower noise impacts. These include: using a 40 mph design speed, using an urban design to minimize the roadway footprint, incorporating roundabouts at intersections near developed areas to slow travel speeds, and other measures. Reference in the Historic section of the EAW inadvertently left in the document that the project was a federal undertaking. Please see Comment 28 and Comment 248 from MnDOT indicating the project is not a federal undertaking. **EIS** The county board will be making a determination on whether an environmental impact statement will be needed in accordance with MEPA requirements.
189	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	Request for Preparation of an Environmental Impact Statement (EIS) Based on Project Scope Expansion and Escalating Costs Review of Steele County's adopted and draft Highway Capital Improvement Plans (CIPs) demonstrates a sustained and substantial expansion in both the scope and cost of the East Side Corridor (ESC) project. These changes exceed routine refinement and indicate that the project being advanced is materially different from earlier iterations previously disclosed to the public. Earlier CIP documents identify the ESC as a shorter facility with significantly lower projected costs, totaling approximately $13.8 million. Subsequent plans show repeated increases in project length, reclassification of the roadway to a Major Collector, expanded right-of-way and utility components, and sharply increased construction and engineering costs. The most recent draft CIP identifies total project costs exceeding $29 million, more than doubling earlier estimates. Intermediate adopted plans document steady upward revisions in total expenditures and funding assumptions, confirming a pattern of scope creep rather than isolated cost escalation . _2023-2027 Steele County Highway Capital Improvement Plan-Final 20221108.pdf None 2026-2030 Highway Capital Improvement Plan DRAFT 20250513.pdf None Under Minnesota Rules part 4410.0200, subpart 23, the purpose of environmental review is to ensure that environmental effects are considered before irreversible commitments of resources are made. When a project evolves substantially in scale, function, or cost, continued reliance on a limited environmental review risks undermining this purpose.	**CIP Changes of Scope and Magnitude:** The project has changed in the CIP. Most iterations did not include 26th Street which was added to the project. Project costs increased over time as new information about costs associated with bridges, right of way and other impacts were identified during the project development process. In general, the CIP information will evolve as projects are further developed. **Minn Rules part 4410.0200, subpart 23:** The referenced rule and subpart is part of administrative rules defining the term environment. Not indicating that environmental effects are considered before irreversible commitments of resources are made. Minn Rules 4410.0200 Definitions and Abbreviations. Subp 23. Environment. "Environment" means physical conditions existing in the area that may be affected by a proposed project. It includes land, air, water, minerals, flora, fauna, ambient noise, energy resources, and artifacts or natural features of historic, geologic, or aesthetic significance.
189					Further, Minn. R. 4410.1700, subpart 7 requires preparation of an Environmental Impact Statement when there is potential for significant environmental effects, based on: -The type, extent, and reversibility of environmental effects (subp. 7(A)); -The cumulative potential effects of related or phased actions (subp. 7(B)); and -The extent to which environmental effects are subject to mitigation (subp. 7(C)). The documented expansion of the ESC—reflected in increased length, higher functional classification, expanded footprint, and dramatically increased costs—reasonably implies increased traffic volumes, higher operating speeds, greater noise and safety impacts, and more substantial effects on adjacent residential neighborhoods. These changes materially affect the type and extent of potential environmental impacts and raise serious questions as to whether mitigation measures can adequately address those impacts within the constraints of the project corridor. Additionally, Minn. R. 4410.1700, subpart 7, requires that decisions be based on accurate and complete project descriptions. The divergence between earlier project descriptions and current CIP-documented scope and cost indicates that the Environmental Assessment Worksheet (EAW) no longer reflects the full magnitude of the project being proposed. Given the substantial escalation in project cost, expansion of scope, and corresponding increase in the potential for significant environmental effects, the current EAW is insufficient to support informed decision-making. Consistent with Minnesota Rules part 4410.1700, preparation of a full Environmental Impact Statement (EIS) is warranted to ensure comprehensive evaluation of environmental impacts, mitigation measures	**Minn R. 4410.1700, subpart 7 requires preparation of an EIS when there is potential for significant environmental effects:** Comment noted. Criteria will need to be followed. The county board will make a decision on the need for an EIS. The need is based upon the analysis and data in the EAW. Not information provided in a CIP that includes a summary of project information.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
190	12/31/2025	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek Drive	Avoidance of Federal Standards How does the County reconcile emails from the Steele County engineer indicating a desire to avoid federal noise and safety regulations and associated mitigation requirements with state and federal environmental review obligations? Predetermined Corridor Location How was the location of the East Side Corridor selected, and how does the County respond to concerns that the location was predetermined prior to meaningful public input? Why were public comments regarding corridor alternatives dismissed or not reflected in the alternatives analysis? Public Comment Transparency Why were public comments not consistently posted on the County website designed to visually present corridor alternatives and citizen feedback, and how does this omission comply with public participation requirements? Noise Impacts and Missing Studies Given the presence of numerous known noise receptors in affected neighborhoods, why were noise studies excluded from the EAW? How can environmental impacts be adequately assessed without noise modeling for residences located as close as 17 feet from the proposed roadway?	**Avoidance of Federal Standards** The project does not have federal funding and is not required to meet federal requirements. **Predetermined Corridor Location:** See response to Comment 1. Input from the public was used to refine the proposed project. As previously indicated, the county lowered the design speed of the roadway, incorporated roundabouts at intersections where there is development, used urban design where there is development, shifted the roadway to the east within the right of way, and other measures to slow traffic and to lower noise impacts based upon input from the public. **Public Comment Transparency:** Public comments from open house meetings were included on the project website. Comments were received at official county and city meetings and those are denoted in city and county records. These comments and feedback are not required to be included in the EAW or posted publicly. MEPA for an EAW does not require public participation during the planning/development of the project. Public review and input is required on the EAW document when it is drafted. **Noise Impacts and Missing Studies:** The project is exempt from state noise standards as the roadway is not a fully controlled access roadway. As noted in the EAW and in responses to Comment 20 noise was considered by the county and some mitigation has been identified. In addition the county incorporated design elements to slow speed (which lessen noise) and to shift the roadway to the east within the proposed right of way to provide greater separation between homes and the roadway.
190					Request for Project Pause and EIS Due to the omission of noise analysis and other significant environmental impacts, including potential health consequences for nearby residents, we request an immediate pause to the project. Why has a full Environmental Impact Statement (EIS) not been initiated despite the magnitude and proximity of impacts? Safety Concerns Due to Proximity How does the County address repeated resident concerns regarding safety hazards created by placing a high-speed roadway within approximately 17 feet of existing homes and structures, including detached garages? Data Access Denial Why has the County repeatedly denied residents access to underlying project data despite multiple requests, thereby substantially impeding informed public participation in the EAW process? Failure to Extend or Reopen Comment Period Despite at least six formal requests, why has the County refused to extend, pause, or reopen the public comment period until requested data is made available? Community Impacts and Displacement How does the EAW address claims from residents that they feel abandoned by both the County and City, including concerns related to financial hardship, property devaluation, and foreclosure risk?	**Request for Project Pause and EIS:** As noted above, detailed noise studies are not required. The EAW identifies impacts associated with health including Air Quality and Greenhouse Gas emissions. The county board will determine if the project will require an EIS. **Safety Concerns Due to Proximity:** Please see response to Comment 22. **Data Access Denial:** See above. Data needed to support the EAW is included in the document text and as attachments in accordance with MEPA. **Failure to Extend or Reopen Comment Period:** See above. Data needed to support the EAW under MEPA is provided. **Community Impacts and Displacement:** Comment noted
190					Resident Testimony Why are substantive resident comments, including those submitted by Otto and Lyssa, not clearly acknowledged or addressed in the EAW findings? Speed Limit and Plat Constraints How does the project account for the fact that homes in the North Country neighborhood were built on only 50 feet of a 150-foot-wide plat, and what justification exists for proposed speed limits under these constrained conditions? Unprecedented Nature of the Project How does the County justify this project as consistent with past practice when the scale, proximity to homes, and level of impact appear unprecedented in Steele County? Federal Undertaking Determination If this project constitutes a federal undertaking, why are federally required noise studies and related analyses missing from the EAW?	**Resident Testimony:** Development of the EAW does not require the county to include comments received outside the official public comment period. **Speed Limit and Plat Constraints:** The project cannot control the plats or city development. The project does not encroach into properties in the North Country neighborhood - no right of way will be acquired from these properties. The project is providing a design speed of 40 miles per hour. **Unprecedented Nature of the Project:** The county is not justifying the need for the project based on past practice. A purpose and need was developed and the proposed project addresses those needs. **Federal Undertaking Determination:** The proposed project is not federally funded and is not subject to NEPA documentation. See response to Comment 28. The project does not have federal funding for construction. Reference in the Historic section of the EAW inadvertently left in the document that the project was a federal undertaking. Please see Comment 28 and Comment 248 from MnDOT indicating the project is not a federal undertaking.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
191	12/30/2025	Matt Pichner	Mpichner193@gmail.com	2183 SE 24th Ave	I am submitting this comment as a directly impacted landowner, farmer, and Steele County taxpayer in formal opposition to the East Side Corridor project as it is currently defined and advanced. I understand that the original intent of the East Side Corridor was to create a north–south traffic connection. That concept has been discussed for many years, and I recognize that some version of a north–south route may eventually be built. What I strongly oppose is how this project has evolved, how costs are being justified, and how major scope decisions—particularly the addition of a bike/walking trail—have been made without clear data, full financial disclosure, or meaningful respect for affected landowners. 1. The bike trail is a frivolous add-on that is not required to meet the project's purpose The stated purpose of the East Side Corridor is traffic movement from north to south. That purpose can be fully accomplished with a rural roadway design. The addition of a paved bike/walking trail does nothing to improve north–south traffic flow. It is a recreational amenity, not transportation infrastructure, and it comes at an extraordinary cost. The trail alone adds millions of dollars to the project. Even within city limits, we have been told the City of Owatonna is only paying approximately 25%, leaving county taxpayers—many of whom live outside the city of Owatonna (including Blooming Prairie, Ellendale and Medford) and will never use the trail—to absorb the majority of the cost. This is fiscally irresponsible. 2. Curb and gutter, storm drains, and ponds exist solely because of the trail It was openly admitted during the process that the proposed stormwater ponds placed in our field were not originally planned, were not independently researched or vetted, and exist and are sized because curb and gutter were added due to the bike trail. That is unacceptable.	**Bike Trail** The purpose and need include nonmotorized facilities as a secondary need for the project. Areas within the city have been identified for trail connections in the city's long range plans and trail plans. Transportation projects should serve both motorized and non-motorized users. **Curb and Gutter, Storm Drains, and Ponds Exist Solely Because of the Trail** Curb and gutter is not provided solely because of the trail. Curb and gutter was included in the project to reduce the roadway footprint and create an urbanized condition to slow traffic and maintain lower design speeds. Providing a trail in a rural section would require additional right of way to accommodate a wider boulevard.
191					I understand that ponds are potentially necessary when surface area is added that cannot absorb run off. The acreage increase due to the bike trail directly influences the size of these ponds and this optional recreational feature triggered a cascade of expensive infrastructure requirements. That decision directly results in: •Additional acres of productive farmland taken out of use, •Permanent disruption to drainage systems, •And long-term uncertainty regarding maintenance and performance. This is not responsible engineering or land stewardship. 3. Severe impacts to drainage, tile systems, and farm operations Cutting a road through our field is not a simple matter of land loss. It directly: •Disrupts major subsurface tile lines and the tile main, •Compromises established drainage patterns, •Complicates access for equipment, •And permanently reduces operational efficiency. These systems were installed at significant cost and are critical to both productivity and environmental performance. Their disruption is not being treated with the seriousness it deserves. Adding ponds on top of that disruption compounds the damage. 4. Emotion-driven decisions are replacing data-driven planning Throughout this process, justification for the bike trail has repeatedly been summarized as "the people want it," without: •Defining who "the people" are, •Demonstrating that county taxpayers were meaningfully represented, •Or showing that respondents were informed of the full cost implications. No clear data has been provided to justify adding a multi-million-dollar recreational amenity to a rural corridor whose stated purpose is traffic movement. Decisions of this magnitude should be driven by data, need, and fiscal discipline—not emotion, assumptions, or internal preferences.	**Impacts to Drainage, Tile Systems, and Farm Operations** As the county works through more detailed design in the final design process, it will meet with property owners to discuss mitigation to farm operations, including tiling, access and drainage. This is standard practice when moving from preliminary design/concept development to final design. In addition, right of way discussions will include compensation conversations. **Emotion-Driven Decisions Replacing Data-Driven Planning:** See response to Bike Trail above.

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191					5. Prior legal failure underscores ongoing transparency problems It is a matter of public record that this project was previously challenged legally and that the County lost because information related to the project was not properly disclosed. Despite that outcome, many aspects of the project today remain vague, poorly defined, and difficult for landowners and taxpayers to fully understand. Scope, costs, long-term obligations, and downstream impacts continue to feel incomplete or obscured. That history makes the current lack of clarity especially concerning. 6. The project is being overbuilt far in advance of actual need We have been told that roads are designed with an approximate 20-year service life, and that projected city growth toward the East Side Corridor follows a similar timeline. If that is the case, it makes far more financial sense to: •Build a basic rural road now to serve current traffic needs, and •Reassess upgrades later if and when development actually occurs. Overbuilding today for speculative future growth is a misuse of taxpayer funds. Closing I am not opposed to infrastructure. I am opposed to: •Unnecessary scope expansion, •Poorly justified costs, •Decisions driven by emotion rather than data, •And the continued marginalization of landowner concerns. The East Side Corridor should be designed to accomplish its stated purpose—north–south traffic movement—and nothing more. The bike trail should be removed from the project scope and evaluated separately, with its own demand analysis, cost justification, and public process. I respectfully request that this opposition be formally recorded and that the County and City reconsider the current design before committing taxpayers and productive farmland to permanent and unnecessary harm.	**Prior Legal Failure Underscores Transparency Problems** The EAW discloses information relevant to the project, and includes references to numerous studies and evaluations. **Overbuilt for Need:** The proposed project addresses the identified purpose and need. It is a two-lane roadway and incorporates design elements to address current needs. Curb and gutter are being used in more urban/developed areas, not for the whole project.
192	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “002.CombinedImpact.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	See response to Comment 217.
193	1/3/2026	Melissa Zimmerman	lyssalynn13@gmail.com	2525 Stony Creek Dr, Owatonna, MN	I did not receive confirmation that this email was received. All the rest were confirmed as received, so I just wanted to check. I have attached the file again to make sure it is received. Thanks, Melissa Zimmerman On Sat, Dec 20, 2025 at 11:10 AM Lyssa Lynn <lyssalynn13@gmail.com> wrote: Hello Mr. Gaines, Please accept this comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. MEPA requires environmental review and public participation to occur early and often, at a point when alternatives are still under consideration and public input can meaningfully influence outcomes. In this case, public notice and engagement occurred only after key decisions had already been made, alternatives had been narrowed, and project direction had effectively solidified. This timing undermines the purpose of the EAW process and deprived the public of a meaningful opportunity to participate before impacts were assumed and options constrained. As a result, the current EAW does not satisfy MEPA’s procedural requirements, and the record cannot support a lawful Finding of No Significant Impact (FONSI). Accordingly, corrective action and heightened environmental review are required. Thank you for confirming receipt and inclusion in the official record.	**Failure to Provide Early and Often Public Notice** **MEPA Requires Early, Meaningful Public Participation** MEPA does not require early, meaningful public participation. An EAW under MEPA requires a 30-day public comment period for review of the document and the information contained. The project went above and beyond those requirements by having open house meetings, stakeholder meetings, and meetings with individual residents/property owners. **Insufficient Notice of the First Public Open House** See above. In addition to a notice in the paper, which was a press release, postcards were mailed to property owners in advance of the open house - with approximately 10 days notice. Those were not noted in the comment. The website was also up and had information on the open house as noticed in the postcards sent to residents. **Why This Notice Was Not Sufficient Under MEPA** See above.

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194	12/31/2025	Becky Dawley	becky_dawley@hotmail.com	960 Countryview Ave	Steele County asked residents from North Country Subdivision to respond to the three noise “options” presented to us. None of those options constitutes lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. Although the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do this. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: •Block line of sight, equivalent in function to a 20-foot noise wall •Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios •Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties •Be entirely contained on public property •Require no private easements or encroachment onto residential land •Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website.	See response to Comment 195.
194					As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE”. Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County’s consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record.	
195	12/31/2025	Jeff Otto	jeffotto74@yahoo.com	2490 Fox Hollow Lane	The County asked residents from North Country Subdivision to respond to the three noise “options” presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County’s obligations under MEPA or NEPA. While the County may claim exemption from certain numeric noise thresholds, it is not exempt from identifying, addressing, and mitigating noise impacts. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a federal undertaking and therefore remains subject to applicable federal regulations, including federal noise requirements. Under MEPA and NEPA, impacts must be addressed in the following order: Avoid, Minimize, Mitigate. Avoidance remains the preferred and required option because it prevents the substantial, documented noise impacts altogether. If the County refuses to pursue avoidance, we are willing to accept a noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation: Block line of sight, equivalent in function to a 20-foot noise wall; Meet applicable MnDOT engineering standards, including but not limited to 1:3 or 1:4 slope ratios; Fully address stormwater impacts, including but not limited to preventing any increase in runoff or drainage onto adjacent properties; Be entirely contained on public property; Require no private easements or encroachment onto residential land; and Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness. Any use of residential property—even temporary—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County’s own website.	**Do not satisfy NEPA:** There is no federal funding for construction of the project. Please refer to Comment 28 regarding funding. Because there is no federal funding, the county is not required to complete a detailed noise analysis according to federal standards or to consider federal mitigation standards. **Do not satisfy MEPA:** See response to Comment 20. Under state rules, the county is exempt from state noise standards as the proposed project is not a fully controlled access roadway. However, the county recognizes there is a change in conditions and has identified some mitigation that will help screen properties from the roadway and incorporated design elements to provide greater separation between residential development and the proposed roadway and means to slow travel speeds, lessening sound. **EAW - Federal Undertaking** See response to Comment 222 **MEPA Sequencing:** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required. **If refuse avoidance - willing to accept a berm complying with Minnesota and Federal regulations:** See responses above. The project is not required to meet federal noise requirements and has followed Minnesota standards. As noted the county has offered berming. The proposed berm would be between 2.5 and 3 feet. Any proposed berms would likely meet 1:3 or 1:4 sloping and meet engineering criteria such as clear zone requirements and drainage permitting requirements and other standards. The berm would be located on public property.

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195					As noted in the EAW, the County has referenced berms “similar to Deer Trail Lane NE.” Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes, which requires a different mitigation analysis and heightened protections under MEPA and NEPA. If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the same functional performance, such as a 20-foot noise wall identified in the project’s noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that avoidance is the legally required first option. The County's consideration of mitigation at this scale demonstrates that the project will cause significant environmental impacts. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an Environmental Impact Statement (EIS). These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed. I incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted into the EAW record	**Berms similar to Deer Trail Lane:** Reference to Deer Trail Lane was provided as an example to illustrate what potential berming would look like, not that it was done for MEPA or NEPA reasons. **Mitigation Other Than Berm**: Please see previous responses that the project is not subject to federal noise requirements. **Consideration of Mitigation Indicates Significant Environmental Impacts:** Mitigation for project impacts by itself does not indicate significant environmental impacts. **Issues and Mitigation were excluded from the EAW making it inadequate:** Please see responses above regarding document requirements. **Incorporate by reference the detailed Owatonna East Side Corridor group noise comment submitted.** Please see response to Comments 157 and 158.
196	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		Please accept the attached PDFs as written public comments for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. The attached documents consist of multiple compilations of public comments submitted in connection with the community petition and are intended to be entered into the official administrative record in their entirety. Please confirm receipt of this email and that all attached documents have been included in the EAW record.	Please include the attached compilation of comments regarding the East Side Corridor petition. **Kent Orman: I've been coming down to visit a resident of Owatonna for three years regularly and know at least one resident whose family lives adjacent to this possible development. And, having become well acquainted with the issues related to this proposed roadway: I would suggest that you do not encroach upon the residential perimeter as it is today and further expand to include residential first and include commercial needs secondary out the half mile to the existing highway. Think about what you are really doing to even consider making such a proposal, there are codes and regulations regarding such development, and there are residents who knowingly chose to live along that perimeter! Sincerely, Kent Orman.kao** Comment noted. **Resident: Before any more urban sprawl, let's tidy up things up inside before tearing up more "everything"...just saying** Comment noted. Please see response to Comment 1 that identifies the need for the project. **Resident: Due to the existing highways, Owatonna's natural development will always be east. It makes more sense to ensure there is more space to work with as we grow to try and avoid the cramped feeling one gets driving through the city and downtown areas.** Comment noted. Please refer to Comment 1 regarding the need for the project. The project is outside of downtown as requested by the commentor. **Resident: Never a good idea or plan to add traffic to a developing residential neighborhood.** Comment noted. The purpose and need in Section 6 indicates that traffic is currently using local streets through neighborhoods to make longer trips as there are not other options. The 29th Ave alignment provides a continuous north-south roadway that does not use neighborhood streets.
196						**Resident: There is no reason to put a highway next to a developed residential neighborhood. Move it less than 1 mile east to 34th Ave. It will give more room for development for gas stations, grocery stores, etc. between the current neighborhood and highway.** Please refer to the response to Comment 1 regarding the need for the project. The 29th Ave corridor provides the connection needed to address transportation problems. **Resident: There is no reason to put a highway next to a developed residential neighborhood. Move it less than 1 mile east to 34th Ave. Less impact on Owatonna residence and leaves more room to develop between the current development and the highway.** See response above. **Resident: There is no reason to put a highway next to a developed residential neighborhood. Move it less than 1 mile east to 34th Ave. Less impact on Owatonna residence and leaves more room to develop between the current development and the highway.** See response above.

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196						**Resident: This is a very unsafe and poor location for the corridor for many reasons. We need our elected officials who are supposed to work for the people to take this seriously. Bixby road and several other roads that are not as close to home have 40 mph speed limits. Putting the corridor on 29th is a bad plan for the cities growth to the east which will likely expand with the now 4 lane to Rochester.** Comment noted. **Resident: I am personally affected by this road being built.** Comment noted. **Resident: My kids deserve a safe neighborhood to play in and a highway takes so much safety and security from us. We are all for an East Side Corridor, it just needs to be done right. We shouldn't be building major infrastructure based on 30 year old plans that were outdated and abandoned 20+ years ago. Owatonna and Steele County needs to do better by their residents. For 30 years the message has been the same, use 34th Ave. But instead of listening we're repeating history and jeopardizing people's lives.** Please refer to the response to Comment 1 regarding selection of a preferred alternative. Please refer to response to Comment 245.
197	12/31/2025	Becky Dawley	becky_dawley@hotmail.com	960 Countryview Ave	The East Side Corridor cannot be reviewed in isolation. It is functionally connected to the 18th Street expansion, railroad roundabout, high school relocation, utility expansions, and Main Street project. These connected actions were improperly segmented to minimize impacts. Further, because of these segmentations, it leads one to wonder what other future projects has the County anticipated that have not been communicated and will therefore, be segmented. Under MEPA and NEPA, a unified Environmental Impact Statement is required. I formally request a full EIS and an independent RGU. Additionally, a FONSI requires a complete, accurate and good-faith evaluation of environmental impacts and reasonable alternatives, and must be supported by substantial evidence in the record. That standard is not met here.	Please see response to Comments 57, 58, and 61.
198	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “030.NoCountyEngineeringOversight.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the advancement of project decisions during a prolonged period in which Steele County lacked a qualified County Engineer, while substantive authority and decision-making influence were effectively delegated to the County’s consulting firm. The absence of independent professional oversight during environmental review undermines procedural integrity, objectivity, and compliance with MEPA requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Comment on Absence of Qualified Engineering Oversight During Environmental Review** See response to comment 201. **Lack of Independent Professional Judgement** The consulting firm was not acting as the county engineer. See response to comment 201 **Advancement of the Project Without Proper Authority** The consulting firm was not acting as the county engineer. Development of the EAW was a joint effort of the county and its selected consultant. **Implications for the EAW** The consulting firm was not acting as the county engineer. Development of the EAW was a joint effort of the county and its selected consultant. **Conclusion** Comment noted. See responses above.
199	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “013.AvoidanceCommentPeriod Denied-mergedRedacted.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Avoidance Rejected for Non-Environmental Reasons - Improper Elimination of Feasible Alternatives** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required.
200	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “025.PublicInputCoordination.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding coordinated public messaging among City, County, and consultant staff that resulted in predetermination and a chilling effect on public participation, undermining the completeness and integrity of the environmental review record. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Predetermination and Chilling of Public Participation Through Coordinated Public Messaging** MEPA does not outline required public participation under Minn. R. 4410 which does require access to public officials: 4410.0300 AUTHORITY, SCOPE, PURPOSE, AND OBJECTIVES. Subp. 4. Objectives. The process created by parts 4410.0200 to 4410.6500 is designed to: A. provide usable information to the project proposer, governmental decision makers and the public concerning the primary environmental effects of a proposed project; B. provide the public with systematic access to decision makers, which will help to maintain public awareness of environmental concerns and encourage accountability in public and private decision making; C. delegate authority and responsibility for environmental review to the governmental unit most closely involved in the project; D. reduce delay and uncertainty in the environmental review process; and E. eliminate duplication. Provide the public with systematic access to decision makers, which will help to maintain public awareness of environmental concerns and encourage accountability in public and private decision making; Residents have had access to information and the opportunity to provide comment on the project website, public meetings, stakeholder/neighborhood meetings, and at regularly scheduled public meetings (county board meetings, city council meetings).

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201	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “033.NoEngineer.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents undisclosed development assumptions associated with publicly owned agricultural land identified as a “Future Destination” in the EAW, including unexplained valuation patterns, planning designations, and induced growth implications that were not disclosed or analyzed. The omission of this information materially understates foreseeable development, land-use change, and cumulative environmental impacts, and prevents meaningful public review. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	Please note the commentors attachment was not 033.NoEngineer.pdf as cited in her email. It was comment/attachment 031.No Engineer.pdf **EAW Comment - Engineering Authority, Authorship, and Reliability** **Lack of Licensed Engineering Oversight During Critical Project Decisions** Development of an EAW is not required to be overseen by a licensed engineer. However, Steele County had licensed engineers working for the county during the entire project process. The county engineer involved in most of the project resigned and the county appointed an interim county engineer until someone could be found to take the job on a permanent basis. The county then hired a permanent engineer. At all times there was overlap in the position - when the engineer resigned the county employed the interim engineer and their time at the county overlapped. When the county hired Ronald Gaines, the public works director, the interim county engineer overlapped positions. Ron Gaines started employment at Steele County on August 20, 2025. He was serving the role as public works director and defacto county engineer when he signed the document in November.
202	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “022.EAWNotice.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding defective notice, delayed disclosure of the EAW, and the denial of a meaningful opportunity for impacted residents to participate in the environmental review process. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Defective Notice and Denial of Meaningful Opportunity to Participate** See response to Comment 236.
203	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “012.DeniedCommentPeriodPreferedAlt-mergedRedacted.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Denial of Public Comment and Hearing Following Presentation of the Preferred Alternative** MEPA does not require a formal public comment or hearing regarding selection of the preferred alternative. Neither does NEPA for that matter. MEPA does require a public comment period on the document and the analysis contained within.
204	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “004.DataRequests.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	The county is committed to public engagement and followed EQB rules and guidance with respect to publicizing the EAW and providing public comment on the project. In addition, the county held three open houses, individual stakeholder meetings, as well as maintained a website for the project. To the extent the comment addresses data related to the project, the data needed to support the EAW is included in the document text and as attachments in accordance with MEPA.
205	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “041.DismissingPublicEngagement.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents inadequate public engagement, misrepresentation of impact information, and apparent predetermination during early project meetings with City and County engineering staff. Residents raised safety, traffic, truck volume, and noise concerns associated with a roadway proposed approximately 17 feet from existing homes. In response, residents were told that protecting children was not the County’s responsibility, truck traffic figures provided by staff later shifted and were minimized, and discussion of noise mitigation was discouraged despite the project’s proximity to residential neighborhoods. The record further shows that residents were explicitly told on May 26, 2023 that all alternatives remained under consideration, yet only five days later the public open house presented a single preferred alternative. This sequence contradicts representations made to residents and strongly suggests that alignment decisions were made prior to meaningful public engagement. The EAW does not disclose or analyze these interactions, depriving decision-makers and the public of critical context necessary to evaluate compliance with MEPA’s requirements for early, transparent, and good-faith public participation. For these reasons, the EAW is incomplete and cannot support a lawful Finding of No Significant Impact. A comprehensive Environmental Impact Statement (EIS) with full, good-faith public engagement is necessary to address safety, noise, traffic, residential impacts, and the integrity of the decision-making process. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Comment on Inadequate Public Engagement, Misrepresentation, and Predetermination** Comments raised are not related to information in the EAW and includes inaccurate commentary. Under MEPA, the EAW does not need to document public participation. See response to comment 206.
206	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “001.PublicCommentParticipation.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Early and Continuous Public Participation Omitted from the Environmental Record** Comment noted. The EAW is not required to document public participation. The county has listened to public input at open house meetings (which are documented on the project website), stakeholder meetings, and at public meeting. Input from the comments have resulted in changes to the design of the project. As previously noted: design speed was lowered to 40 miles per hour, roundabouts were included to slow traffic and to provide better safety at intersections, an urban design with a smaller footprint was included near developed areas to lessen the roadway footprint and push it towards the east to provide better separation between development and the roadway.

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207	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “039.EnvironmentalJusticeCumulativeImpacts.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents cumulative and disproportionate impacts resulting from the suppression of avoidance alternatives, withholding of noise mitigation and impact data, and denial of meaningful public participation during the environmental review process. These actions compounded foreseeable harms—including residential noise exposure, health risks, stress, and loss of neighborhood cohesion—by preventing affected residents from understanding, responding to, or protecting themselves from known impacts while decisions continued to advance. The record demonstrates that these impacts disproportionately burden residents of the North Country neighborhood, including a substantial concentration of individuals with disabilities and serious medical conditions for whom increased noise, vibration, and barrier effects are particularly harmful. Environmental justice principles require early disclosure, avoidance, and meaningful participation where disproportionate impacts are foreseeable. The failure to evaluate these cumulative and environmental justice impacts renders the EAW inadequate and precludes a lawful Finding of No Significant Impact, necessitating preparation of an independent Environmental Impact Statement (EIS). We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination.	**Environmental Justice and Cumulative Impacts** **Cumulative Impacts and Environmental Justice Concerns Resulting from Withheld Alternatives and Suppressed Impact Data** This is not related to the required cumulative impact analysis in the EAW. Please refer to the EAW (Section 21) regarding cumulative impacts. **Cumulative and Disproportionate Harm** This is not related to the required cumulative impact analysis in the EAW. Please refer to the EAW (Section 21) regarding cumulative impacts. Federal NEPA documentation requires sequencing - avoidance, minimization, mitigation as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project based on state requirements and determine if there is a need for an EIS. **Environmental Justice Implications** Environmental Justice is disproportionate impacts on low income and/or minority individuals - not individuals with disabilities. Environmental Justice was a federal evaluation required under NEPA. Federal funding for construction is not included in the project and is therefore not required. Environmental Justice considerations have been removed from federal environmental documentation via Presidential Executive Orders signed earlier in 2025, and are no longer allowed.
208	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “024.JTC_merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the exclusion of the public from the Joint County/City Transportation Committee, the use of closed or inaccessible meetings to shape key project decisions, and the resulting chilling of meaningful public participation during the environmental review process. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Exclusion of the Public from the Joint Transportation Committee** Comment noted. There have been public meetings associated with the project, information has been posted on the project website, and regularly scheduled county board and city council meetings have shared information on the project and have allowed for public comment and input on the project. MEPA does not require public participation in every meeting that occurs. MEPA for an EAW does not require early and often public participation. **Chilling of Public Participation Through Restrictive Communication Directives** See response above. **Conclusion and Request for EIS** See response above.
209	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “021.DowntownImpacts.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the failure to analyze reasonably foreseeable environmental, economic, social, and fiscal impacts associated with the project’s stated purpose of diverting traffic from downtown Owatonna. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Failure to Analyze Downtown Impacts Despite Stated Purpose and Need** Appendix K in the EAW contains information on the shift in traffic expected by 2040. As noted in the traffic study approximately 800 trips a day by 2040 would likely shift off Mineral Springs Rd if the east side corridor is built. There are expected to be between 9,300 and 10,100 trips a day going through the downtown on Mineral Springs Rd if nothing is done. With the project there are expected to be between 8,500 and 9,300 on Mineral Springs Rd. While these volumes would result in less congested conditions (volume to capacity ratios change from congested conditions to approaching congestion) on Mineral Springs Rd, there would still be between 8,500 and 9,300 trips a day on this route. This does not include the traffic on other routes in the downtown. Mineral Springs Rd is not the only road in the downtown. So a decrease in 800 trips in a downtown as a whole does not substantially alter or impact activities in a downtown as a whole. Downtown Owatonna is a destination with businesses and cultural activities that will continue to be a draw and a destination. Please see tables 10 and 12 in the EAW. A detailed economic analysis for shifting up to 800 trips was not completed and was not required to be completed as part of the EAW.
210	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “010.AvoidMinimizeMitigateComments.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Failure to Apply the Avoid - Minimize - Mitigate Hierarchy - Mitigation Refusal and MEPA/NEPA Noncompliance** Comment noted. The comments are not on the EAW produced. NEPA processes are not required as the project does not have federal funding. See response to Comment 20 .
211	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of community members concerned about the East Side Corridor project, please accept the attached document titled “026.FederalFundsLimitedParticipation.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record. This submission is intended for inclusion in the official administrative record and reflects concerns related to the project’s environmental review, process, and compliance with applicable requirements. Please confirm receipt of this submission and that it has been properly entered into the EAW record.	**Impaired Public Participation, Predetermination, and Incomplete Alternatives Analysis** Comment noted. Federal funding was removed from the project and put onto a different project as noted in the response to Comment28. The county and city indicated the requested change in funding at public meetings.

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212	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “014.FederalMemorandumAnalysis-merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Supplemental Technical Comment - Analysis of 61-page Memorandum and Purpose and Need** Please see response to Comment 1 - an EAW under MEPA does not require an alternatives analysis. The alternatives analysis was completed when there was federal funding for the project. Information on the purpose and need was shared with the public at public meetings held prior to obtaining concurrence of the 29th Ave alternative in September 2024. A formal public comment period or hearing on the preferred alternative was not required.
213	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “034.FutureImpacts.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents the failure of the EAW to analyze reasonably foreseeable future roadway expansion and the inadequacy of the proposed right-of-way. County statements acknowledge that future widening to three or four lanes is contemplated, yet the EAW analyzes only the initial build, improperly segmenting the project and understating cumulative impacts. The omission of foreseeable expansion prevents meaningful public review of long-term noise, safety, air quality, and residential proximity impacts, and warrants preparation of an Environmental Impact Statement (EIS). We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Foreseeable Future Expansion and Inadequate Right of Way** Please see response to Comment 218.
214	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “006.26th St Comparision.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Improper Reliance on 26th Street as a Comparator for Residential Impacts** Comment noted. Comments indicating any comparison between 26th Street and the proposed project was to provide residents a local example and understanding of what a berm and landscaping could look like. It was not intended to substitute for MEPA evaluation. Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS. Sequencing is not required.
215	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “016.All Alternatives of a Single Route In 5 days.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Procedure Misrepresentation and Improper Sequencing Between May 26 Stakeholder Meeting and May 31 Open House** Please refer to Comment 1 - under MEPA EAW an alternatives evaluation is not required. At the time of the meetings the project had federal funding and an alternatives analysis was required. The county had done analyses and correctly stated that all alternatives were on the table at the May 26 meeting. Information presented at the open house on the 31st was to show the alternatives evaluation to the public and to indicate what the county's preference was. It was communicated that the review (at that time - because of the federal funding) would have to be reviewed by FHWA and they would have to provide concurrence for it to be officially identified as the preferred alternative that would be evaluated in in more detail in the federal environmental document. Ultimately FHWA did provide concurrence on 29th Ave, but that is irrelevant at this point, as the project does not have federal funding and is not subject to NEPA rules. MEPA does not require public participation in the project development process for an EAW.
216	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “032.TownshipTimeline_mergedFinal.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents improper intergovernmental sequencing and the proxy limitation of project alternatives through Township action during ongoing environmental review, as well as the County’s acceptance of those actions without independent deliberation, in violation of Minn. R. 4410.3100. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Improper Intergovernmental Sequencing and Proxy Limitation of Alternatives** See response to Comment 162. An alternatives analysis or consideration of multiple alternatives is not required under MEPA for the preparation of an EAW. **Township Meeting Schedule Makes Independent Action Implausible** Comment noted. Perhaps there was an error on the date. The meeting was on May 14 (date is off by a day) **Township Resolution was Executed Before Any Township Meeting** Comment noted. See response above. **Resolution Originated Through County Process** The attached resolution does not make any reference to a public works meeting. Information surrounding this comment is not accurate. **County Accepted the Resolution Without Vote or Deliberation** Items such as this are allowed on a consent agenda. As noted previously, an alternatives analysis is not required under MEPA. **Advance Federal and Internal Warnings Were Ignored** Federal funding was officially removed before adoption of the resolution and was no longer subject to federal requirements. The county did not use the resolution to decide on an alternative. **Effect on Environmental Review Integrity** See response above **Conclusion** See responses above. The county board will determine whether an EIS is needed under MEPA.

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217	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “002.CombinedImpact.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Incompatible Land Uses and Property Value Impacts** Property vales are not an environmental effect and are not required for an EAW. There are numerous factors impacting property values - including the overall state of the economy, interest rates, housing demand, adjacent development, supporting transportation network, quality of the school district/schools, and numerous other factors. The EAW does address adjacent land uses and the county has provided opportunities for residents to provide input on whether they would like the project to incorporate measures such as berms, trees, and fencing to help shield homes from the roadway.
218	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “005.FutureImpacts.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Failure to Analyze Reasonable Foreseeable Indirect and Cumulative Impacts** Section 21 of the EAW discusses cumulative impacts that could occur in the future. The timeline for cumulative effects is reasonably foreseeable actions. The proposed roadway is expected to have traffic volumes approaching less than 3,500 vehicles a day 20 years in the future (please see Attachment K in the EAW). Roadway capacity of a two-lane roadway is approximately 10,000 vehicles for urban roadways. The traffic volumes would suggest that for a foreseeable future, the proposed roadway design should be adequate. The project includes roundabouts at intersections where existing development is present thus helping to address safety and speed, which should eliminate the need for changes in traffic control for the foreseeable future. Additionally, the project includes multimodal accommodations (trail, roundabouts) to address nonmotorized user needs for the foreseeable future. **Minnesota Precedent Demonstrates Foreseeability** I-94 was constructed before environmental reviews were in place. The comment is not applicable.
219	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “007.MemorandumErrorAccountability-merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Material Errors, Reliability of Information and RGU Responsibility** Please see response to Comment 1 - MEPA EAW requirements do not require an alternatives analysis.
220	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “011.MischaracterizationofTechnicalInformation.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Inconsistent and Misleading Traffic and Noise Information** Traffic studies included in the EAW are for annual average daily traffic, which is for all vehicles - cars, trucks, and buses. This is typical of most traffic studies unless there is a concern about abnormal truck traffic - i.e., areas near a port, industrial development, etc. that would require further investigation for roadway geometrics or other evaluations. The county had been looking at potential truck volumes when the project had federal funding, as the noise analysis includes a breakdown of vehicle type. The project is not federally funded and a federal noise analysis is not required. **Setback Distance** In terms of distance of the roadway from homes. There are erroneous comments made that the roadway is 17 feet from people's homes and bedroom windows. An exhibit was used at the most recent public meeting to show the distance between homes and the proposed roadway. The distance between the edge of the roadway and property lines varies based upon if the design in the area is urban, rural, or suburban and if the trail is located on the side by the home. In the North County neighborhood. The proposed roadway right of way is 17 feet from two homes. The actual roadway is at least 65 feet away. Most homes are over 100 feet away from the proposed roadway. Berm height is expected to be 2.5 - 3 feet tall depending upon the berm slope and the level area on top of the berm.
221	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “018.3B-merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Failure to Evaluate and Disclose a Feasible Avoidance Alternative (Alternative 3B)** Preparation of an EAW does not require an alternatives analysis under MEPA. Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes. A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS.

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222	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “027.FederalUndertaking.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the failure to disclose, analyze, and integrate the project’s federal undertaking status into the environmental review, including the implications for federal environmental obligations, mitigation requirements, and public participation. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Omission of Federal Undertaking Analysis Undermines the Integrity of the Environmental Review** The project does not have federal funding for construction. Reference to cultural resources was inadvertently left in the document indicating the project was a federal undertaking. Please see Comment 28 and Comment 248 from MnDOT indicating the project is not a federal undertaking. While federal permits may be required, the permits do not require full NEPA review. **Pattern of Funding Manipulation to Avoid Federal Mitigation** Federal funding was removed from the project for several reasons, including the project's inability to meet the federal funding time constraints. Please refer to response to Comment 28. Information on the cultural resources was prepared before federal funding was removed from the project. It was an oversight keeping it in the EAW document and noting there was a federal undertaking. **Federal Undertaking Determinations Excluded from Public Analysis** Please see previous responses above.
222						**Predetermination and Public Harm** The comments under this section are not accurate. The county was not without a county engineer even during transitions. The EAW requires documentation of your preferred alternative and that was known during this time period and that was the work completed. **Conclusion and Requested Action** The project is not a federal undertaking as noted above.
223	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “009.PredeterminationComments.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Supplemental Comment - Pretermination and Alternative Bias** Please see response to Comment 224.
224	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “035.Inadequate Alternatives Analysis.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents material deficiencies in the EAW’s alternatives analysis arising from inconsistent and biased treatment of residential impacts and condemnation costs across alternatives. Specifically, residential acquisition costs were selectively included for some alternatives and excluded for others, despite comparable or greater proximity impacts, resulting in a skewed comparison that reflects predetermination rather than objective environmental review. As the Responsible Governmental Unit, Steele County is responsible for the accuracy and consistency of the information relied upon, including data adopted from the federal memorandum. These methodological inconsistencies prevent meaningful comparison of alternatives, obscure reasonable avoidance options, and render the EAW inadequate under MEPA, necessitating preparation of an Environmental Impact Statement (EIS). We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Flawed Foundation, Pretermination, and Inadequate Alternatives Analysis** Preparation of an EAW does not require an alternatives analysis under MEPA.
225	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “029.EngineerLeaving_merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding actions taken to approve and advance implementation-level engineering, right-of-way determination, and mitigation-driven design for a preferred corridor while environmental review was ongoing and during the departure of the County Engineer. These actions materially prejudiced the consideration of alternatives in violation of Minn. R. 4410.3100. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	Please see response to Comment 162. Also note. Under MEPA, an EAW does not require an alternatives analysis.

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226	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “036.PredeterminationTimelinePrint.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents a multi-year timeline demonstrating that the 29th Avenue alignment was identified, designed, advanced, and treated as the assumed outcome well before public notice, alternatives development, or environmental review occurred. Planning documents, capital improvement plans, consultant scopes, alignment maps, utility coordination, and internal correspondence show that the project’s location and design were functionally selected years in advance, in violation of Minn. R. 4410.3100, which prohibits alternative-limiting actions prior to completion of environmental review. The record further demonstrates that public participation was delayed and constrained until after decisions had already foreclosed reasonable alternatives, rendering subsequent alternatives analysis illusory rather than genuine. This loss of procedural integrity cannot be cured through post-hoc explanation or mitigation and necessitates preparation of an Environmental Impact Statement (EIS) to restore meaningful consideration of need, location, and environmental consequences. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Predetermination Timeline:** Statute sited in the comment - Minn 4410.3100 refers to actual construction of a project. Please see response to Comment 225. Under MEPA EAW an alternatives analysis is not required. Purpose and need are to be defined and a project description is to be provided. The county board will determine whether an EIS is required under MEPA.
227	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “036.PredeterminationTimelinePrint.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents a multi-year timeline demonstrating that the 29th Avenue alignment was identified, designed, advanced, and treated as the assumed outcome well before public notice, alternatives development, or environmental review occurred. Planning documents, capital improvement plans, consultant scopes, alignment maps, utility coordination, and internal correspondence show that the project’s location and design were functionally selected years in advance, in violation of Minn. R. 4410.3100, which prohibits alternative-limiting actions prior to completion of environmental review. The record further demonstrates that public participation was delayed and constrained until after decisions had already foreclosed reasonable alternatives, rendering subsequent alternatives analysis illusory rather than genuine. This loss of procedural integrity cannot be cured through post-hoc explanation or mitigation and necessitates preparation of an Environmental Impact Statement (EIS) to restore meaningful consideration of need, location, and environmental consequences. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	Indicated pdf was not attached to the email. Appears to be a duplicate comment of 226. See response to Comment 226.
228	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “015.AbandonedCorridor-merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Reliance on a Functionally Abandoned Corridor Renders the EAW Incomplete and Misleading:** The EAW did not rely upon previous studies to determine a preferred alternative. Existing plans and actions were noted in Section 10 of the EAW to note consistency with previous efforts. They were noted to provide context of the different types of corridors (more local connection or more beltline/beltway) considered. The purpose and need included in Section 6 of the EAW documents the need for the current project - traffic through neighborhoods, traffic going through downtown and lack of continuous north south routes. Under MEPA EAW requirements, the proposer is to identify a purpose and need and describe the project. An alternatives analysis is not required. The county did not rely on an official map to determine the alignment.
229	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “040.ProjectRestartsPredetermination.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents repeated restarting and reclassification of the environmental review process—including shifts from a hybrid EAW to a programmatic review and then to a non-programmatic EAW—only after residents raised formal concerns with state agencies. These repeated resets reflect unresolved procedural defects, improper project definition, and a reactive approach to environmental review that is inconsistent with MEPA’s requirement for early, accurate, and informed decision-making. The record shows that each restart altered the scope, assumptions, and analytical framework residents were asked to comment on, without resetting timelines, correcting prior misinformation, or clearly disclosing deficiencies in earlier approaches. This pattern raises serious concerns regarding predetermination, segmentation, and post-hoc justification of decisions already made, and materially impaired meaningful public participation. Given this history, the current EAW cannot reasonably support a Finding of No Significant Impact and warrants preparation of a full independent Environmental Impact Statement (EIS). We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Repeated Restart and Reclassification of Environmental Review:** When the project had federal funding, FHWA and MnDOT worked with the county to determine the appropriate level of documentation. FHWA has the ultimate say in what document is required when federal funding is included. The county agrees that direction on document type for federal review changed. A state EAW was always required, as it met state thresholds for the document. The county was preparing the EAW and the federally determined document - non-programmatic categorical exclusion - when federal funding was removed from the project. That stopped the federal review and process. The state EAW was then prepared according to MEPA requirements. As noted in previous response to comments, under MEPA EAW preparation, an alternatives analysis is not required. The proposer identifies the purpose and need for the project and then evaluates it. MEPA does not require public input in project planning. The county did provide opportunities for public input beyond what is required under MEPA. Please refer to response to Comments 31 and 234 regarding segmentation and connected actions.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
230	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “008.RGUMissingInformation.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Missing and Withheld Impact Information:** The project does not have federal funding. As a result, a detailed noise analysis and mitigation are not required. State standards indicate the project is exempt because the roadway is not a fully access controlled roadway. The county acknowledges that the new roadway will be a change and has identified potential mitigation to help screen properties from the roadway -including berming, landscaping, and fencing; made design considerations to use an urban roadway section to minimize the roadway footprint and to provide additional boulevard space to increase the distance between homes and the roadways and to slow travel speeds. Roundabouts were also included as safety measures and to slow travels speeds on the corridor. A floodplain analysis was included in the EAW (Section 12) and more information on the modeling is included in Attachment D. Additional analyses and coordination with the DNR will continue through final design as noted in the EAW. The EAW includes required information on impacts to farmland. Drainage has been considered and reviewed. More detailed analyses regarding tiling impacts and BMP sizing will occur, which is standard practice. The county will work with property owners during the final design and/or right of way acquisition if needed. The EAW discloses the information required under state requirements. MEPA does not require details on income and other items mentioned in the comment. In terms of cumulative impacts and scope creep, please see the responses to Comment 239.
230						**Misrepresentation of Noise Regulation Applicability:** The project does not have federal funding for construction and is not subject to federal noise requirements . Please see response to Comments 20 and 28. As noted in the response to Comment 236, there was an error in keeping the federal historic review information (Section 15) in the document after removal of federal funding. **Federal Undertaking Contradictions and Withheld Documentation:** Please see the response directly above. **Failure to Inform Residents and Dissemination of Inaccurate Information:** The county provided multiple opportunities for the public to review information on the project and to provide their input. Saying the county had not spoken with East Side Corridor residents is not true. There were three open house meetings, individual stakeholder meetings, the project website, and updates at city council and county board meetings. The EAW includes information on noise and the proposed alternative consistent with MEPA EAW requirements. It is not required to address federal NEPA requirements. Residents should review the document for information about the project.
230						**Failure of the Purpose and Need:** Comment noted. The purpose and need is clearly documented in the EAW in Section 6 support for this project. **Omission of Public Input, Cost and Funding Information:** State EAW documentation does not require reporting of this information. The project does not have federal funding, and federal project documentation is not required. **Conclusion:** See responses above and to other comments noted.
231	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “038.RoadwayReloation.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents selective roadway relocation and redistribution of impacts away from new development areas and onto existing residential neighborhoods and active farmland. Project layout materials show that a roadway segment adjacent to the Majestic Oaks development is planned to be removed or truncated while the East Side Corridor alignment is extended northward to assume that traffic function, resulting in the proposed right-of-way being placed as close as approximately 17 feet from some existing homes and re-bisecting productive agricultural land. The EAW does not adequately disclose or analyze this redistribution of traffic, noise, safety, and farmland impacts, nor does it evaluate whether reasonable avoidance-oriented alternatives could prevent shifting environmental burdens from development areas onto established neighborhoods and agricultural operations. The record further reflects cost-driven and alignment-constrained mitigation decisions, including differential treatment of noise mitigation and dismissal of development-stage compatibility measures, raising serious concerns regarding predetermination and selective burden shifting. These deficiencies undermine the objectivity and adequacy of the environmental review and warrant preparation of an independent Environmental Impact Statement (EIS). We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Selective Roadway Relocation** One of the intents of the project is to provide a necessary north-south roadway that redistributes traffic away from downtown. How 29th Avenue connects to Kenyon Road is proposed to extend north and south, rather than maintain the current connection to 26th Street and ultimately require a turn back to the alignment south of 26th Street. Some traffic will be redistributed, but that is one of the intended outcomes of the project. 26th Street will remain in place and will have higher volumes than what exists today as shown in the traffic study as summarized in Section 20 of the EAW and included in Attachment K. Traffic will remain in front of both areas. **Decision-Maker Statements Minimizing Compatibility and Mitigation** In Section 10, the EAW discloses that there will be impacts to farmland with construction of this project. The federal process NEPA requires more detailed farmland impact analysis, but that analysis is not required under MEPA. **Conflict with Internal Project Documentation:** The project does not have federal funding. A federal noise study and mitigation are not required. Under Minnesota requirements, the project is exempt from state noise standards because the roadway is not a fully access controlled roadway. The county did consider noise as part of the project due to the new alignment. As noted in the response to Comment 245, the county has identified berming, landscaping and fencing as potential mitigation as noted in Section 19 of the EAW. In addition designs have been modified to slow traffic, which will help reduce noise impacts. **Predetermination and Appearance of Bias:** Comment Noted.

Comment	Date Received	Name	Email	Address	Comment	Comment Response
232	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “019.Predetermination.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Systemic Predetermination by Cooperating Governmental Units:** Predetermination is reviewed under federal NEPA reviews. MEPA, for an EAW does not require an alternatives analysis. A project/alternative can be identified and the EAW is required to disclose/document the impacts associated with the project. At the end of the process, following agency and public input, the RGU (Steele County in this case) is required to make a determination if an EIS is needed. Other governmental agencies are allowed to provide comment and input on their preferences for alternatives. The township indicated in their resolution that it was consistent with the annexation agreement and that is why they supported it. It was included as full disclosure of the township's interest in the project and its annexation agreement with the city, but it did not determine the alternative under review in EAW. The city can comment the same as other agencies during the official comment period. Development of the EAW did not rely upon the resolutions from these agencies. **Improper Reliance on Mitigation Instead of Avoidance:** Under MEPA, an alternatives analysis is not required. The EAW is intended to document the impacts associated with a preferred alternative/project. See response to Comment 50 which describes what an EAW is required to do. Sequencing - Avoid, Minimize, Mitigate is required under federal review. The project does not have federal funding as noted in response to comment 28. The project does not have to follow federal NEPA requirements.
232						**Failure of Purpose and Need:** The EAW includes the purpose and need of the project. It will benefit existing development and traffic demand. Please refer to Section 6 of the EAW that outlines the purpose and need. It is noted that it is needed to address existing transportation problems. It will also benefit the city as it continues to grow and develop - but that does not mean that encouraging development is the need for the project. **Federal Undertaking and Environmental Justice:** The proposed project is not a federal undertaking as it does not have federal funding for construction please see response to Comment 28. It is not a federal undertaking subject to NEPA. As a point of information for the commenter and those reviewing responses, Environmental Justice requirements - which were federal requirements, not state requirements, were eliminated by President Trump via Presidential Executive Orders in early 2025. **Required Remedy:** See responses to comments. The county board will make a determination on whether an EIS is needed.
233	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “033.ParcelID08-012-3400-merged.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission documents undisclosed development assumptions associated with publicly owned agricultural land identified as a “Future Destination” in the EAW, including unexplained valuation patterns, planning designations, and induced growth implications that were not disclosed or analyzed. The omission of this information materially understates foreseeable development, land-use change, and cumulative environmental impacts, and prevents meaningful public review. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Undisclosed Development Assumptions on Public Agricultural Land Labeled "Future Destination"** The referenced information in the comment about a future destination was included in the traffic study for the project and included as Attachment K in the EAW. As denoted in the EAW, it was used to identify potential future traffic on the east side corridor. This area has been identified as a potential school site as noted in the traffic study. This information comes from the city's comprehensive plan. The EAW is required to determine traffic impacts. Part of identifying future traffic growth is to understand the planned land uses and the trips they generate. This was explained in the traffic study included in the EAW. Comments regarding property value are not applicable to the traffic information presented.
234	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “028.Segmentation.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the unlawful segmentation of the East Side Corridor from directly connected transportation, development, utility, and trail projects, resulting in the failure to analyze connected and cumulative impacts as required under MEPA and NEPA. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Segmentation of the East Side Corridor and Related Projects** Segmentation is a federal term. The project is not using federal dollars and not subject to federal documentation. MEPA rules discuss connected action. Please see responses to comments 57, 58, and 61.
235	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “023.VIAImpacts.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the Visual Impact Assessment’s failure to analyze the reasonably foreseeable visual impacts of a noise wall, despite its acknowledged feasibility and consideration elsewhere in the project record. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Failure to Analyze Noise Wall Constitutes a Fundamental Defect in the VIA** A noise wall is not being proposed as part of the project. The visual impact assessment did not include analysis of a wall, as it is not proposed. State statutes do not require construction of a noise wall.

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236	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “020.Website Inaccuracies.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the accuracy of public-facing information, adequacy of notice, and compliance with public participation requirements during the environmental review process. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**General Response to the Overall Comment** Comments are directed about information contained on the project website and are not on the actual EAW. MEPA does not require public participation or engagement as part of developing the environmental document - just in providing an opportunity for agencies and the public to participate. **Website Inaccuracies and Public Notice Failures** **Basic Project Information** The website has consistently provided information on the project background, need, engagement, frequently asked questions, and notice and summary of public engagement opportunities. When there has not been new information to report, there have been periods where there have been fewer updates. **EAW / Comment Period Not Properly Noticed on the Website** The EAW was posted to the EQB as required. It was published on November 18, 2025. The EQB posting included information on where the documents were available, which was the project website and provided a link to the website. The EAW was put on the project website the day the notice was published in the EQB. The EQB posting included information on the public meeting date and location. As required, a legal notice was published to the local paper which included information on the availability of the documents and included information on the public meeting. There was an error on the comment end date in the original publication to the EQB, as the county was extending the public comment period beyond the required 30 days to due to the upcoming holiday (Thanksgiving). A second notice was published to the EQB the following week showing the extended comment period to end on December 31. A comment form was provided on the website and website text indicated that you could contact the project about comments via email. The email was provided on the project website. The email is: info@eastsidecorridor.com. The EQB posting also provided contact information if people had questions. Several comments were received via email.
236						**Required Public Meeting** A state EAW does not require a public hearing/meeting. The county committed to conduct a public meeting/open house during the public comment period and sent notices of the meeting and provided information about the meeting on the project website. The public meeting was noticed on the EQB Monitor Publication, legal ads, and press releases. **Minn R. 4410.1500(A)(13) - Copes of EAW** State rules require the RGU (Steele County) to provide a hard copy of the EAW if requested. The county did not receive written notification or requests for a copy of the EAW. People signing up for website and project notices are not specifically requesting copies of the EAW. **Federal Funding- Website Did not Disclose** The project does not have federal funding. It did at one time, but federal funding was removed. Please see response to Comment 28 regarding federal funding. The project website has information about the federal funding being removed. **Website Availability** The website was active during those months which is evident from site diagnostics. Furthermore, the project team was never notified by anyone that there were issues accessing the site, which an effort to troubleshoot individual's problems could have been rectified. **Introduction of New Project Conclusions Outside Any Public Process** The commenter does not provide clarity on what new conclusions were provided on the project website. Not every piece of research, background information, technical analysis, decision needs to be put on the project website during the course of project development.

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236						**Unclear Technical Authority and Oversight** Agencies have staff transitions during projects. There was staff in place at the county to continue the project, advance design, prepare environmental documents and update the website. The EAW - which is what comments are supposed to be directed to - was signed by a representative of the RGU as is required for publication. This is the public-facing material for the EAW. Not every piece of information provided needs to include information on the engineer of record, consultant roles, technical review and governing body approvals. **Misrepresentation of Growth Areas and Study Boundaries:** The study area was defined when identifying potential alternatives to address the purpose and need. The project area and study area are consistent with areas identified for future growth in the city of Owatonna's Comprehensive Plan. This growth area is identified in Figure 9 of the EAW. **Misleading Traffic Justification** Traffic information is included in the EAW in Section 20 and attached traffic studies (Attachment K). Not everything in the EAW is on the project website, nor is it required to be. The same is true for the purpose and need, which is fully documented in the EAW in Section 6 and supported by information in included figures and other attachments. **Improper Expansion of Project Scope and Segmentation** Information on the project website provides background information about numerous previous studies and documents that have evaluated transportation needs on the eastern side of Owatonna. There were different types of transportation needs and purposes of these studies. Some concluding that long-term a beltline/beltway is needed that would provide additional connections to US 14 and some concluded that additional routes to serve more local traffic flow withing the community were needed. The information was provided to show context and sort out the numerous studies completed over the past three decades. It was not determining the scope of this or future work.
236						**Predetermination** The MEPA process does not require an alternatives analysis for an EAW. The county is allowed to select an alternative and document its impacts in the EAW. Predetermination is a NEPA consideration. MEPA does not require public participation in the development of the project. The county provided multiple opportunities for the community to provide input on the alternatives and studies conducted throughout the project development process. Information from public meetings is included in the website and was considered in the project development. Counties are required to budget for potential projects and they are included in capitol improvement plans. That is why funding for improvements was noted. **Inaccurate Statements Regarding Existing Infrastructure:** The statement referencing the connection of CSAH 43 to US 14 is not incorrect. That is a current connection to US 14 and is planned to be so in the long-term. That is relevant to information included in studies for a beltline/beltway. There has been a long history of studies for transportation improvements and information on the website was included to identify the studies and the roles of the different roadways. **Mischaracterization of the "Officially Mapped Corridor"** The inclusion of the officially mapped corridor was provided for context of the history or different studies, documents, and items produced that have occurred.
236						**Misleading Project History and Funding Narrative:** The project was a new initiative in 2021 due to the fact that the county had funding to build a project. In preparing grant applications, project proposers (Steele County) need to provide some information on what they would like to build. It does not negate the need to complete required studies and documentation., which the county did complete under MEPA as federal funding was removed from the corridor. **Misrepresentation of Federal Involvement and Regulatory Status:** The project does not have federal funding. It was an error to include the federal review of cultural resources in the EAW (information on cultural resources was not provided on the website). That has been documented in the FOFC. MnDOT provided a comment during the public comment period that federal funding is no longer provided and the project is not subject to federal review. **Mischaracterization of Public Engagement:** When the project had federal funding, it went through a formal alternatives evaluation process. That process required federal review and approval before being shared with the public to ensure compliance with NEPA requirements. That information was then shared with the public at an open house for comments on the alternatives evaluation. **Use of Condemnation Language Prior to Environmental Review Completion:** The graphic was intended to show what the next steps to occur following environmental documentation. Steps include completing final design and acquisition of right of way. Condemnation is a part of the process, if needed. It is not intended to manipulate negotiations. It is just stating a fact in the project development process. **Conclusion:** See responses above. Comment noted.

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237	12/31/2025	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		On behalf of concerned residents and community members, please accept the attached document titled “017.DataDenialForYears-mergedRedacted.pdf” as a formal written public comment for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor project. This submission reflects collective concerns regarding the project’s environmental review, process, and compliance with state and federal requirements. We request that this comment be entered into the official EAW record and considered in full as part of the County’s environmental determination. Please confirm receipt of this submission and that it has been properly included in the administrative record.	**Failure to Disclose Supporting Data for Rejection of 34th Avenue Alternative** Please see response to Comment 1. Preparation of an EAW does not require an alternatives analysis under MEPA. The alignment at 29th addresses the documented transportation needs by providing the north-south connectivity where none exists today. As noted previously, federal funding is not being used to construct the project and is not required to follow federal document requirements (response to Comment 28).
238	1/1/2026	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		Please accept the attached PDF as a formal written group comment submitted on behalf of East Side Corridor residents for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. This submission documents that the ESC is being advanced primarily to serve development objectives rather than to address a transportation need requested or supported by the public. Planning documents, internal records, and engagement materials—including the 2040 Transportation Plan, Imagine Owatonna, and related correspondence—demonstrate a long-standing intent to facilitate development east of the city, including increasing the value of publicly held land such as school-owned property adjacent to the proposed corridor. Current and ongoing public input clearly reflects that residents did not ask for a corridor at this location and instead favor avoidance-based alternatives near 34th Avenue that provide greater separation between roadways and development and better protect safety, health, and livability. Despite this, the City has remained adamant in advancing the corridor at its current location, and the EAW does not meaningfully reconcile that position with public input or explain why alternatives aligned with community preference were not advanced. This comment is submitted to document that the project’s purpose and alignment are development-driven and inconsistent with demonstrated public need and safety priorities, and that these deficiencies undermine the adequacy of the EAW. Please confirm receipt of this submission and that it has been entered into the official EAW record.	**Purpose and Need** Section 6 of the EAW documents the transportation need for the project. A transportation need does not need to be identified by the public. Under MEPA - the project proposer is required to document the need. See response to Comment 1 that rearticulates the current transportation problems and the need to address them. **Avoidance** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes (See responses to Comment 28). A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS (see response to Comment 50).
239	1/1/2026	Owatonna East Side Corridor Residents	owatonnaeastsidecorridor@gmail.com		Please accept the attached PDF as a formal written group comment submitted on behalf of East Side Corridor residents for inclusion in the Environmental Assessment Worksheet (EAW) record for the East Side Corridor (ESC) project. This submission documents substantial scope creep and cost escalation associated with the ESC project, increasing from early estimates of approximately $9–11 million to $30–35 million or more, with the total cost now uncertain. These increases reflect the incremental addition of project elements—including expanded intersections, roundabouts, bridges, railroad treatments, urban cross-sections, right-of-way acquisition, and development-related accommodations—that were not supported by verified traffic data or demonstrated safety need. Internal correspondence further shows that project scope, cost assumptions, and design features were actively advanced and refined prior to completion of traffic analysis, safety evaluation, or environmental review, including discussion of cost adjustments and presentation strategies while acknowledging unknowns and speculative future development as primary drivers. This sequencing undermines the integrity of the environmental review process and prevents meaningful public evaluation of the project’s true scale and impacts. This comment is submitted to document that the EAW does not adequately disclose or analyze the full scope, cost drivers, and reasonably foreseeable impacts of the project, resulting in a materially incomplete environmental review. Please confirm receipt of this submission and that it has been entered into the official EAW record.	See response to Comment 164.
240	1/1/2026	Matthew Sennott	matt.sennott@gmail.com	2519 Stony Creek D	Here are the attachments to support this comment. Thanks.	See response to Comment 189.
241	12/26/2025	Robert Grant	7589co13@gmail.com	7589 Co. Rd 13	I would like to no how you will deal with the traffic noise it is going from 6 cars a day to over 2000 120 feet from my sons house 2857 26th street ne	**Noise** Please refer to Section 19 of the EAW and response to Comment 20. The project is exempt from state noise standards. However, the county is considering berming, landscaping, and fencing between homes and the roadway.
242	12/27/2025	Robert Grant	7589co13@gmail.com	7589 Co. Rd 13	How do you plan on doing with all the water if you build the road through the flood fringe right now the high water spreads out over the flood fringe	**Floodplain** Please refer to Section 12 of the EAW. Information on the approach to work by Maple Creek is documented there. It also describes next steps and coordination with DNR as design advances and additional information is developed. A preliminary floodplain assessment has been completed and is included in Appendix D of the EAW. The county would be happy to meet with your and your son and discuss the data and work to date.
243	12/28/2025	Robert Grant	7589co13@gmail.com	7589 Co. Rd 13	I have elevations up and down maple creek both sides from when the development was done just to the west of my land .you need look how deal with the water if you filled in the flood fringe you to store all that water some because just building a bridge higher does not allow the water to spread out so the water will rise up in heavy rain which in turn will flood my sons house	**Floodplain** Please refer to Section 12 of the EAW. Information on the approach to work by Maple Creek is documented there. It also describes next steps and coordination with DNR. A preliminary floodplain assessment has been completed and is included in Appendix D of the EAW. The county would be happy to meet with your and your son and discuss the data and work to date.

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244	12/28/2025	Cat Waterius		1880 white oak lane NE	In case more traffic on 26th St. It would be nice to slow traffic near neighborhoods, currently 55. Maybe go down to 45mph all the way west. Also signage for No jake breaking, which probably should be up already. That stretch of 26th bumpy with noisy trailers, will that be resurfaced? Also the water drainage and run off from new path on 26th, will that fill up the pond which has flooded in past on south side where homes are.	**26th Street** The proposed project includes two roundabouts on 26th - at the far western project limits (Kenyon Rd/NE 24th Ave) and at the intersection with the new north-south route). The two roundabouts will help to slow traffic coming past existing developments. The roadway will be designed for a speed of 45 miles per hour. **Jake Brakeing** The county and city can look at requirements regarding jake braking signage as part of final design. **Bumpy** The proposed project will reconstruct 26th between Kenyon Rd/NE 24th Ave and where the new roadway is being built. **Drainage** Additional drainage analysis will be completed during final design and it will include an evaluation of existing and proposed stormwater drainage and ponding. Existing and proposed ponds could be modified during this stage. This typical of the design process.
245	12/29/2025	Ross Zimmerman	Razman52@gmail.com	2525 Stony Creek Drive	Why is the city county trying to put this road so close to our houses. The laws say that they need to avoid causing issues like this FIRST, before trying to place a road right next to our backyards. There are several options that would allow the road to be either moved out away from the houses, or to put the road at 34th Ave instead. This whole route selection process has been a sham from the start. Never has the public comments led the plans to be changed or adjusted despite the public outcry. I was at the open house and was shocked to see how many of the "OFFICIALS" passed the buck and knew seemingly nothing about the history of this project, nor could they defend the current plans for the road. The county engineer that signed off on these road plans was in the position for a whole 2 days before having to approve the plans. This whole process needs to be restarted with the public interests in mind and a route that doesn't pass right next to existing houses with a 55mph highway.	**Avoidance** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes (See responses to Comment 28). A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS (see response to Comment 50). **Alternatives** Please refer to the response to Comment 1 that indicates that an EAW under MEPA does not require an alternatives evaluation. **Changes in Plan/Design** Input from the public was taken into consideration. Several design modifications were made based on public input: reduced design speed to a 40 mile per hour low speed design, incorporated roundabouts to slow traffic on the roadway, included urban and suburban sections to minimize the roadway footprint near development, and shifted the roadway to the east within proposed right of way near developed areas to provide better separation.
246	12/29/2025	Ross Zimmerman	Razman52@gmail.com	2525 Stony Creek Drive	Start it over. Explain the exact reasons the alternate options were rejected in favor of this final route and justify how that is "avoiding" the proximity to houses with noise levels and safety to existing houses and kids.	**Alternatives** Please refer to the response to Comment 1 that indicates that an EAW under MEPA does not require an alternatives evaluation. **Avoidance** Federal NEPA documentation requires sequencing - avoidance, minimization, and mitigation sequencing as part of project development. The project does not have federal funding and is not required to follow federal document processes (See responses to Comment 28). A state EAW prepared under MEPA is intended to document the impacts of a project and determine if there is a need for an EIS (see response to Comment 50). **Noise and Safety** Please see response to Comment 20.
247	12/31/2025	Lori Abbe	ljabbe@charter.net	413 Pebble Beach Dr.	I attended the informational open house & want to express my thoughts to build the road (County Rd #29): •The right away easement adjacent to the Countryside addition has been in place since the early 1990s (prior to homes being built); specifically preserved for a future road. •Interestingly, I learned that the proposed road is NOT 17 feet from the closest house! More like 60+ feet, similar to many roads and streets in our community. •I am disappointed that a handful of people, who claim to speak for all of us, are causing delays for this project to be built. All at the cost of the tax payers, i.e. inflationary increases to the overall project every year it is delayed! •Please quantify and report to us (the public) the additional costs for this project due to delays, data requests, environmental assessments, etc. •In simple terms, I see this as having a house next to a railroad track and expecting a train to never go by!! For the greater good, lets get this project built!!!!	Comment Noted
248	12/9/2025	Amy Ollila/MnDOT Cultural Resources Unit	Amy.ollila@state.mn.us	Cultural Resources Unit, Environmental Stewardship, 395 John Ireland Boulevard, Mail Stop 620, Saint Paul, MN 55155-1800	We were just made aware that there is no longer FHWA funding applied to the project: East Side Corridor Project (SP 074-070-009). I have attached an official letter noting that this project is no longer an FHWA undertaking and explaining that MnDOT does not have a role under state statutes. It is the responsibility of the landowner and project proposers to comply with State Statutes. See enclosed letter. It was a pleasure working with you both on this project.	Comment Acknowledged
249	12/11/2025	Fausto Cabral/MnDOT District 6	fausto.cabral@state.mn.us		Here you are a copy of the text I received from DOT Office of Environmental Services: “I confirmed with CRU that they would not have a role in the state process. MnDOT no longer has a role in the project as the funding changed and is not being reviewed/approved by SALT. This should be disclosed as a change since the EAW was published in the Findings of Facts and Conclusions document with reference to the sections of the EAW where MnDOT was mentioned- section 14, section 15, table 10 and table 11.”	Comment Acknowledged

Gmail

Lyssa Lynn <lyssalynn13@gmail.com>

ESC Data Practices Requests / Status

Lyssa Lynn [redacted] Tue, Dec 9, 2025 at 11:20 PM
To: "Housh, Campbell" <Campbell.Housh@steelecountymn.gov>, "Jarrett, Robert" <robert.jarrett@steelecountymn.gov>
Cc: Matthew Sennott [redacted], Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>, "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Abbe, Jim" <Jim.Abbe@steelecountymn.gov>, "Brady, James" <James.Brady@steelecountymn.gov>, "Glynn, John" <john.glynn@steelecountymn.gov>, "Krueger, Greg" <Greg.Krueger@steelecountymn.gov>, "Prokopec, Joshua" <joshua.prokopec@steelecountymn.gov>

Dear Rob and Campbell,

I was able to inspect the County's public data on **December 9, 2025**, arriving at approximately **4:00 p.m.** I had several specific tasks I intended to accomplish during this inspection:

- Inspect traffic studies that were previously inaccessible
- Inspect the most recent dataset made available
- Inspect the dataset that Matt Sennott was previously unable to review
- Locate several specific emails from the original datasets

I was **unable to accomplish any of these tasks**.

I am therefore providing formal notice regarding the County's **continued failure to provide meaningful access** to public data requested in connection with the East Side Corridor project, as required under **Minn. Stat. §13.03**.

Despite repeated attempts to inspect the data on **July 21, August 28, October 28, and December 9,** and repeated notice to the County, the data and inspection environment provided have not allowed meaningful access or review.

Ongoing and Uncorrected Access Failures (Timeline)

Meaningful access to the requested public data has **not been available since March 11, 2025**. Any access attempts after that date have been thoroughly documented as inaccessible, unstable, or unusable.

These failures did not occur in isolation. The current conditions compound previously documented data access issues identified on **January 15 and February 4, 2025**, which were formally raised with the County and **never corrected**.

Despite repeated notice over multiple months, the County has not restored stable, complete, and reasonably usable access to the public data. Instead, access has progressively degraded over time, culminating in the inspection failures documented below.

Dataset 1 and Dataset 2 – Email Records (Materially Incomplete)

The jump drive labeled **Dataset #1**, which previously contained **over 1,800 email records**, contained only **18 accessible emails** at the time of inspection. As a result, I was unable to locate specific emails that I had previously reviewed and relied upon. This raises concerns regarding the integrity and completeness of **Dataset #2** as well.

During earlier inspections, I spent **many hours loading thousands of emails into Outlook** to make the data in these datasets reasonably usable. Outlook is no longer available on the inspection system, and the email data previously accessed is no longer present or accessible in that form.

Additionally, the email files are **randomly named and not organized chronologically or logically**, making it impossible to locate known records. Outlook was necessary to render the data usable. Because of these defects, I was unable to locate specific records that are vital to preparing my Environmental Assessment Worksheet (EAW) comments.

Loss of Data Integrity and Irreparable Prejudice

Even if the County were able to recover or re-produce the missing email data at some point, the repeated access failures have created a **loss of continuity and verifiability**. There is no way to confirm that any subsequently provided data would be identical to the datasets previously available or that it would include all records originally responsive to the request.

In addition, restoring access at this stage would require re-reviewing and re-organizing a substantial volume of data that was originally requested more than 14 months ago. Residents previously spent approximately 15–18 hours reviewing and organizing these records in order to make them usable.

Requiring this work to be repeated due to the County's access failures imposes an unreasonable burden and further prejudices meaningful participation. Delayed or reconstructed access does not cure the denial of access that has already occurred.

Dataset 4 – Degraded and Unusable Email Content

The most recent dataset appears to consist of emails converted to .txt files. These files are severely degraded, including instances where text appears one character per line. Attachments, metadata, threading, original formatting, and contextual structure have been removed.

As presented, these files are functionally unusable and do not allow meaningful inspection. Public data must be provided in the manner in which it is generally stored and maintained. Email records are not stored as .txt files, and conversion to this format strips essential context, attachments, and usability.

PST / Native Email Files

PST and native email files are present in dataset #3, including a PST associated with Paul Sponholz exceeding 3 GB, which Matt Sennott documented as usable on July 21, 2025. When opened during this inspection, the file displayed a blank screen with no email content. Other PST or native files similarly failed to open or display records in a meaningful way.

Third-Party Viewing Software

The County replaced standard email software with third-party viewers, including CoolUtils Outlook Viewer and other third party viewers. As configured, this software does not present email records in a commonly understood or intuitive format. Navigation is not common-sense, layout is non-standard, and email content appears fragmented and distorted.

The software does not allow for loading and retaining multiple email files; previously viewed content disappears upon closing, making review tedious and impracticable. Emails cannot be reviewed as a complete dataset or viewed chronologically.

Files are assigned random filenames with no logical order, date, sender, or subject identifiers. This prevents sorting, searching, timeline reconstruction, identification of related correspondence, or location of known records.

The use of this software, as well as other viewers such as the Word document viewer, alters how records appear — including fonts, spacing, and layout — and does not display records as they are ordinarily maintained or reviewed. In practice, the records appear garbled rather than intelligible public data.

Physical Media and System Failures

The County provided four USB drives and one CD for inspection. I was unable to access any data on the USB drives. The PDF files on the CD could be opened, but access was extremely slow. Word documents that were previously available are now missing.

I was informed that certain Word documents were converted to PDFs and that both formats were available; however, I did not observe corresponding Word and PDF versions of these files.

The County previously testified under oath that it purchased a new computer system dedicated to public data inspection. The system provided is outdated and unstable. Upon startup, it entered an automatic repair process, demonstrating that it is not suitable for public data inspection.

Security, Integrity, and Availability of Standard Government Tools

The access failures described above are not justified by security, technical, or licensing constraints.

The County has previously testified under oath that it operates within a Microsoft enterprise environment with full Microsoft licensing. As such, the County already possesses secure, compliant tools capable of displaying email and document records as maintained, including licensed Microsoft Office applications designed for enterprise and government use.

Standard configurations exist that allow records to be viewed in a read-only, offline environment, preserving data security and integrity while allowing meaningful inspection. These configurations do not require user accounts, internet connectivity, or modification of underlying data.

Instead, the inspection environment relied on **non-standard third-party viewing applications** that fragment datasets, alter formatting and layout, and prevent coherent review. Beyond impairing access, this approach introduces **system governance and security risk**. Inspection systems can be reconnected to a network with minimal action, and third-party software that does not operate within a managed enterprise update and security framework increases exposure to vulnerabilities and outdated components.

This approach introduces security risk and departs from standard government IT practices designed to minimize risk and preserve data integrity.

The inspection environment provided is therefore **neither secure nor functional** for purposes of public data inspection.

Avoiding licensed, enterprise-managed software in favor of non-standard viewers is not a reasonable tradeoff where it introduces additional security and governance risk.

Impact on Legal Participation

As a result of these **ongoing, uncorrected access failures**, the data is incomplete, inaccessible, and degraded to the point of being unusable. These conditions have directly interfered with my ability, and my community's ability, to review public records necessary for **meaningful participation in the ongoing Environmental Assessment Worksheet (EAW) process**.

At this point, the condition of the data and the inspection environment constitutes **denial of access to public data** under Minn. Stat. §13.03.

For clarity, I hold a **degree in computer science** and am experienced in reviewing large electronic datasets. Despite that expertise, I was unable to access or meaningfully review the data as provided.

I documented these conditions with photographs and video at the time of inspection.

ction.

Governance and Compliance Notice

The Office of Administrative Hearings has made clear that **meaningful access to public data is a prerequisite to lawful public participation**, and that public entities have an affirmative obligation to ensure that such access is provided. In this case, the continued denial of usable access — including missing datasets, degraded records, and data previously available and now inaccessible — is occurring during the **active EAW comment period**, when public review is required to be informed and substantive.

Under **MEPA and NEPA**, public participation is intended to occur **early and often**, with access to the underlying data necessary to evaluate purpose, need, impacts, and alternatives. Here, ESC-related public data essential to that review was not made meaningfully accessible **prior to the release of the EAW**, and remains inaccessible now.

Proceeding with the EAW while required data remains unavailable undermines the **procedural integrity** of the environmental review and deprives the public of the opportunity for **meaningful participation** contemplated by state and federal law.

In light of these unresolved access failures and the requirements of MEPA and NEPA for informed public participation, proceeding with the EAW while essential public data remains unavailable raises serious procedural concerns. The appropriate corrective action under these circumstances is to **pause the EAW process until meaningful access to the required data has been restored**, so that public participation can occur as required by law.

Because these matters involve required compliance with an OAH order (**CAH 22-0305-40882**), East Side Corridor–related public data, and the integrity of EAW procedures, I have copied the County Board for awareness and oversight.

Requested Action

Please advise, in writing, how and when the County will provide access to the **complete, intact, and reasonably usable dataset** in a stable and functional inspection environment, as required by Minn. Stat. §13.03.

Sincerely,
Melissa Zimmerman
Owatonna East Side Corridor Residents
[Quoted text hidden]

Gmail **Lyssa Lynn <lyssalynn13@gmail.com>**

ESC Data Practices Requests / Status

Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com> Mon, Dec 8, 2025 at 4:49 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: Matthew Sennott [redacted], Lyssa Lynn [redacted], "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Housh, Campbell" <Campbell.Housh@steelecountymn.gov>

County Attorney Jarrett,

Thank you for your response. We need clarification on several points where the County's "no data exists" determinations conflict with data that clearly does exist and with the requirements of Minn. Stat. §§ 13.03, 13.05, and 15.17.

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1. Joint Transportation Committee (JTC)

Steele County's own 2025 Committee Appointments document lists the **Intergovernmental Joint Transportation Committee** under "Joint Powers, Advisory Board, Regional Representation." This is responsive data showing the Committee's official status.

Additionally, **commissioner per diem/attendance records for JTC meetings exist** and were not produced. These records alone demonstrate that the County *has* maintained JTC-related data.

For clarity:
Our JTC request was **not limited to minutes**. It includes all data the County "created, received, maintained, or disseminated" regarding the JTC, including emails, correspondence, materials provided to commissioners, formation/purpose records, and any ESC-related documents.

Given that responsive records **do** exist, please explain:

1. Why they were not identified or produced;
2. Whether the County intends to correct its "no data" response; and
3. If you maintain that another entity holds additional JTC records, **which entity** and whether Steele County has requested copies pursuant to §13.05, subd. 11.

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2. Noise Studies / Noise Modeling

Your response states that no noise studies were "conducted or received."
However:

- **WSB transmitted ESC noise modeling to the State**, and
- **County commissioners received portions of this modeling within the last few weeks.**

This contradicts the County's assertion that no such data exists or was received. Under Minn. Stat. §13.05, consultant-produced modeling is government data, and the County is required to request and provide it.

Please clarify:

1. Whether the County now acknowledges the existence of ESC noise modeling;
2. Whether the County has requested the full modeling data from WSB; and
3. Why this data was not identified or produced in response to our request.

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3. Required Documentation for “No Data” Determinations

For each item where the County continues to assert that no responsive data exists, please provide:

- The systems, databases, and locations searched;
- Date ranges;
- Staff who performed each search;
- Whether archived, OneDrive, email, or consultant-held data was included; and
- Any documentation reflecting search steps (search terms, internal notes, communications).

If no documentation exists for any of these searches, please confirm that in writing.

We appreciate the ongoing work involved in processing these requests. At this point we are simply seeking to reconcile the County’s statements with the existence of responsive data and with statutory requirements.

We look forward to your clarification so that these requests can be considered fully responded to.

Respectfully,
Melissa Zimmerman & Matt Sennott
Owatonna East Side Corridor Residents
[Quoted text hidden]

Gmail

Lyssa Lynn <lyssalynn13@gmail.com>

ESC Data Practices Requests / Status

Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> Mon, Dec 8, 2025 at 4:07 PM
To: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>, Matthew Sennott [redacted]
Lyssa Lynn [redacted]
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Housh, Campbell" <Campbell.Housh@steelecountymn.gov>

Dear Ms. Zimmerman and Mr. Sennott,

Thank you for your continued engagement regarding the East Side Corridor (ESC) data practices requests.

Re: Joint Transportation Committee

You are misinterpreting Minn. Stat. § 471.59. This statute does not require the county to enter into a joint exercise of powers; it allows the county to enter into agreements but does not require it to do so. Additionally, to my understanding, this committee exercises no authority or government powers. This committee has no formal agreement. It is no different than any other ad hoc committee. Therefore, the committee is not required and does not have minutes. While the Joint Transportation Committee is listed as a Joint Powers entity, Steele County is not the responsible authority for maintaining its records. We have confirmed that no records were created or received by the County in connection with this Committee. If records exist, they may be maintained by another participating entity. The County has not destroyed any such records, nor were any withheld.

Re: Noise Studies

Former county engineer Paul Sponholtz told us there were no formal noise studies. Regarding Ms. Fry's Testimony: Ms. Fry's statement during the ALJ proceeding accurately reflects the scope of the County's search. To the county's knowledge, Mr. Sponholz conducted a targeted search of the relevant drive where ESC-related project files are maintained. The county's position remains that no noise studies were conducted or received.

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Re :Commissioner Emails

Microsoft Purview now has an analytics tool that produced the attached summary for the "Commissioner ESC" data request. It includes a search of OneDrive as well as emails. As you can see, there are 5829 items, an unknown number of page(s) for each. I provided the columns FileClass, SubjectTitle, and Location. If you'd like to speed up the document request, I can certainly go through a specific item if you highlight them from this list. Otherwise, it is thousands of pages that likely contain irrelevant information but do fit your data request. **There are 336 items ready for review.** The estimated competition date is updated to January 2, 2026.

This and previously requested and responsive data remain available for viewing in accordance with Minn. Stat. § 13.03.

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-

Robert J. Jarrett

Data Practices Responsible Authority Steele County

Steele County Attorney

Direct: 507-444-7786

[Quoted text hidden]

Commissioner Emails ESC search results analytics summary.csv
1385K

Comment #45A

Date: December 12, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Environmental Assessment Worksheet (EAW) – East Side Corridor / 29th Ave Project

The EAW's treatment of noise impacts is incomplete, misleading, scientifically inaccurate, and legally noncompliant under MEPA, NEPA, FHWA regulations, and Minnesota Rules Chapter 4410. The document fails to disclose the magnitude of noise increases for homes located as close as 17 feet from the proposed right-of-way and substitutes ornamental landscaping for legitimate, federally recognized noise mitigation. This constitutes a fundamental defect in environmental review.

The EAW inaccurately suggests that berms, boulevard trees, and 6-foot residential fences may be used as "noise mitigation." This assertion is demonstrably false. MnDOT guidance and FHWA's *Highway Traffic Noise: Analysis and Abatement Guidance* state unequivocally that vegetation and landscaping do not provide meaningful noise reduction and that effective barriers must be continuous, solid, and sufficiently tall to block the line of sight between noise sources and receptors. Trees, shrubs, and standard residential fencing provide approximately 0–1 dBA of noise reduction—far below the 7–10 dBA minimum required for a perceptible change—and are wholly insufficient to address a noise increase exceeding 30 dBA. MnDOT further states that measurable noise reduction using vegetation would require at least 100 feet of dense evergreen trees approximately 15 feet tall, along with long-term maintenance. Presenting decorative vegetation or residential fencing as mitigation is scientifically indefensible and materially misrepresents environmental effects, in violation of Minn. R. 4410.1400.

Because the Project uses federal funding, involves federal decision-making, and requires federal approvals, FHWA noise regulations (23 CFR 772) apply. These regulations require: (1) Traffic Noise Model (TNM) analysis of existing and future noise levels; (2) identification of all impacted receptors; (3) disclosure of absolute and relative noise changes; (4) evaluation of reasonable and feasible noise barriers; (5) analysis of avoidance and minimization; and (6) meaningful public involvement in noise mitigation decisions. The EAW includes none of these required elements. It does not provide TNM modeling, does not disclose receptor counts, does not present predicted decibel levels, does not evaluate noise walls, and does not analyze avoidance or minimization. This constitutes a categorical violation of NEPA and 23 CFR 772.

FHWA guidance further makes clear that adverse noise impacts are not limited to exceeding Noise Abatement Criteria (NAC) thresholds. FHWA recognizes that substantial increases in traffic noise—defined as increases of approximately 5 dBA—may constitute adverse impacts even when NAC levels are not exceeded. The County's own prior noise analysis indicates that noise levels may increase from approximately 20 dBA under existing rural-residential conditions to approximately 55 dBA under the proposed roadway. A 30–35 dBA increase represents an

eight- to sixteen-fold increase in perceived loudness and is widely recognized as causing sleep disturbance, adverse cardiovascular effects, impaired learning outcomes in children, and degradation of both indoor and outdoor residential environments. The EAW fails to disclose this magnitude of change, a material omission that violates MEPA's requirement for accurate and complete environmental disclosure.

The EAW further states that local governments are "required to take reasonable measures to prevent the approval of land use activities that would violate state noise standards," while simultaneously asserting exemption from those standards. This internally contradictory interpretation misrepresents statutory obligations and local responsibility. Even where MPCA Rule 7030 operational limits may not apply, MEPA still requires disclosure, quantification, and mitigation of noise impacts. No exemption authorizes the County or City to disregard human health impacts or applicable noise analysis requirements.

The Project introduces high-speed, high-volume traffic immediately adjacent to an existing residential neighborhood, resulting in disproportionate noise, health, and safety impacts on a vulnerable population, including children, elderly residents, and medically susceptible individuals. The EAW fails to evaluate the severity of these human health impacts or assess whether they constitute disproportionately high and adverse effects, as required under MEPA's consideration of the human environment.

Additionally, proposing homeowner-maintained fencing as "mitigation" improperly shifts the burden of environmental harm from a public infrastructure project onto impacted residents. Mitigation for a public roadway must be provided and maintained by the project sponsor. This approach raises serious equity and civil-rights concerns and further demonstrates the Project's failure to avoid or adequately mitigate harm.

Because the EAW:
(1) fails to provide required noise modeling;
(2) omits disclosure of absolute and relative noise levels;
(3) relies on nonfunctional landscaping measures as "mitigation";
(4) fails to evaluate avoidance or minimization;
(5) disregards MnDOT and FHWA noise guidance;
(6) misstates local agency obligations; and
(7) fails to fully evaluate disproportionate human health impacts,

the environmental review is incomplete, inaccurate, and legally deficient under Minn. R. 4410.1400 and 23 CFR 772. **A full Environmental Impact Statement (EIS) is required.**

Melissa Zimmerman
Owatonna, MN
Directly impacted resident

Comment #45B

MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS

Court of Administrative Hearings
PO Box 64620
Saint Paul, MN 55164-0620
651-361-7900
mn.gov/cah/

November 24, 2025

VIA EMAIL ONLY
Matt Sennott
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VIA EMAIL ONLY
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VIA EMAIL ONLY
Robert J. Jarrett
Steele County Attorney's Office
303 S Cedar Ave
Owatonna, MN 55060
scao@steelecountymn.gov

Re: ***In the Matter of Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman vs Steele County***
CAH 22-0305-40882

Dear Parties:

Enclosed and served upon you please find the **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER** in the above-entitled matter. The Court of Administrative Hearings' file in this matter is now closed.

If you have any questions, please contact me at (651) 361-7970, cara.hunter@state.mn.us, or via facsimile at (651) 539-0310.

Sincerely,

CARA HUNTER
Legal Assistant

Enclosure

cc: Docket Coordinator
Tamar Gronvall

CAH 22-0305-40882

STATE OF MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS

In the Matter of Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman vs. Steele County	**FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER**

This matter came before Administrative Law Judge Christa L. Moseng for a hearing on October 10, and 17, 2025. The first day of the hearing took place remotely and exclusively involved procedural matters. The second day of the hearing took place at the Steele County Administration Building, 630 Florence Avenue, Owatonna, Minnesota. Both parties filed written closing arguments on November 7, 2025, at which time the hearing record closed.

Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman (Complainants) appeared on their own behalf and without counsel. Mary Haasl and Margaret Skelton, Ratwik, Roszak & Maloney, P.A., appeared on behalf of Steele County (Respondent or County).

On May 30, 2025, Complainants filed a Data Practices Complaint (Complaint) with the Court of Administrative Hearings alleging that the County violated the Minnesota Government Data Practices Act (MGDPA or Act).[1] On June 3, 2025, the undersigned issued an order requiring Complainants to file an amended version of the large exhibit attachment to the Complaint limited to MGDPA claims, serve a copy on the County, and stayed the County's response deadline until the amended attachment were served on the County.[2]

Complainants filed amended attachments to the Complaint on June 17, 2025.[3] Complainant served the MGDPA Complaint and amended supporting evidence on the County on July 16, 2025.[4] The County filed a request for an extension of their response deadline on July 25, 2025.[5] The Judge granted the County an extension of seven days for its response, and the County timely filed an Answer to the Complaint on August 15, 2025.[6]

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[1] Minn. Stat. §§ 13.01–.99 (2024).
[2] Order Ensuring Expeditious Service of Complaint Under Minn. Stat. § 13.085, subd. 2(d) (Jun. 3, 2025) (a more detailed discussion of the procedural posture is included in the attached Memorandum).
[3] Complaint and amended supporting evidence (June 17, 2025).
[4] Complainant Affidavit of Service (Jul. 18, 2025).
[5] Motion to Extend Deadline to File a Response (Jul. 25, 2025).
[6] Order Granting Extension for Time to File a Response (Aug. 1, 2025); Notice of Motion and Motion to Dismiss (Aug. 15, 2025).

On September 15, 2025, the Judge determined that Complainant's claims against Respondent for violations of Minn. Stat. § 13.03, subd. 2(a) and 3 were supported by probable cause and would proceed to a hearing.[7]

Complainant's exhibits 1-44 were received into evidence. Respondent's exhibit marked 100, with attachments marked 100A-100K, was received into evidence.

STATEMENT OF THE ISSUES

1. Did Respondent violate Minn. Stat. § 13.03, subd. 3, by charging a fee in response to a request to inspect public government data?

2. Did Respondent violate Minn. Stat. 13.03, subd. 2(a) by failing to put in place procedures that ensured prompt and appropriate responses to requests for public data?

3. If so, what remedy is appropriate to address the violation(s)?

SUMMARY OF CONCLUSIONS

Respondent violated Minn. Stat. § 13.03, subd. 3 by informing Complainants, who requested access to government data for purposes of inspection only, that payment of a $0.25 fee for any photographs taken of the data was required. The County admitted it violated the MGDPA and has remedied the violation by eliminating this procedure.

Respondent's procedure of addressing multiple requests for government data from a single requestor exclusively in the order in which those requests were received violated Minn. Stat. § 13.03, subd. 2(a), because it resulted in responses to requests that were not prompt, as required by statute. The County has remedied this by moving to a more flexible procedure that allows smaller data requests to be handled more rapidly.

Respondent's procedure for responding to requests submitted to the Responsible Authority resulted in multiple inappropriate responses to data requests in violation of Minn. Stat. § 13.03, subd. 2(a).

Based on the record and pursuant to Minn. Stat. §§ 13.085, subd. 5(a)(3) and (b), a $300 civil penalty is assessed against the County.

The Complainants have substantially prevailed in this matter. Under Minn. Stat. § 13.085, subd. 6(c), $950 of their original filing fee will be refunded and the County will be billed for the Court's costs in conducting this matter, up to a maximum of $1000.[8]

Based on the evidence in the hearing record, the Judge makes the following:

[7] Notice of Probable Cause Determination and Order for Prehearing Conference (Sep. 19, 2025).
[8] Minn. Stat. § 13.085, subd. 6(c).

FINDINGS OF FACT

I. Background

1. Steele County is located in Southeastern Minnesota and contains both the City of Owatonna and Owatonna Township within its borders.[9] The County is involved in an ongoing infrastructure project known as the East Side Corridor Project (ESC Project or Project).[10]

2. The goal of the ESC Project is to build a new road along the eastern edge of the City of Owatonna, largely within Owatonna Township.[11] The project aims to reroute traffic out of the city center and onto this new road.[12]

3. Residents who live near the proposed location of the new road have organized to advocate and provide input regarding the ESC Project.[13]

4. Complainants made multiple requests to the County for government data in connection with the ESC Project under the MGDPA.[14]

5. Robert Jarrett (County Attorney Jarrett) is the County Attorney in Steele County, the Responsible Authority for the County under the MGDPA, and the County's Data Practices Compliance Officer.[15] Renae Fry (County Administrator Fry) is the Steele County Administrator and is the formal Designee under the MGDPA for the County's Administration department.[16]

6. The County's MGDPA procedures and guidelines were formally updated by the Steele County Board on August 12, 2025.[17] Prior to that, the last update to the MGDPA procedures and guidelines took place on August 1, 2019.[18] The MGDPA procedures and guidelines form an "overarching policy" for data practices in Steele County.[19]

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[9] *See* Steele County Demographics and Geography, https://www.steelecountymn.gov/visitors/about_steele_county/facts_and_figures.php (last visited Nov. 17, 2025).
[10] *See* Exhibit (Ex.) 9.
[11] Ex. 13 at ESC-67.
[12] Ex. 43 (Showing a local news report discussing the overall purpose of the East Side Corridor Project as well as responses from the public to it.).
[13] *See* Ex. 45; *and* Complaint at 3 (May 30, 2025) (The two named Complainants, Matt Sennott and Melissa Zimmerman "are representing a group of 60 (i.e. East Side Corridor Residents) residents and 500+ petition signers who support our cause of getting access to public data via our data request(s).").
[14] *See, e.g.* Steele County's Post-Hearing Brief at 1 (Nov. 7, 2025) ("Steele County ("County") received eleven data requests and one preservation request under the Minnesota Government Data Practices Act ("MGDPA") from Complainants Matt Sennott, Melissa Zimmerman, and the Owatonna East Side Corridor Residents (hereinafter, "Complainants") from October 2024 through July 2025.").
[15] Ex. 100A at 33; Ex. 37 at ESC-278.
[16] Ex. 100A at 33; Ex. 37 at ESC-278.
[17] Test. Fry; Ex. 38 at ESC-244.
[18] Ex. 100B; Ex. 37 at ESC-196.
[19] Testimony of Renae Fry (Test. Fry).

7. Under the August 12, 2025 procedures, data requests made to the County are first routed to County Administrator Fry, who determines whether they can be answered solely with public-facing or other easily accessible data, or if further work with specific departments or staff will be necessary.[20] If a request involves only easily accessible or public facing documents, County Administrator Fry can often complete the request entirely on her own.[21]

8. More complicated requests, on the other hand, require coordinating with other departments, in particular the information technology (IT) Department.[22] The County Attorney's office is also involved in reviewing data requests to ensure coordinated, uniform responses and to review for private or otherwise non-public data.[23]

9. Currently, the IT Department employs four people, though one is assigned full-time to supporting the MNPrairie Human Services organization.[24] The County IT Department is involved in data requests because the County uses Microsoft Onedrive for backups of its government data.[25]

10. Onedrive is a "cloud-based storage tool" used to create a backup of "anything that is generated electronically within the county."[26] Every County employee has an account on Onedrive. This results in a massive database, but access to that data is limited such that each employee can access only the data needed for their work.[27] In order to search for government data across multiple, or all, individual accounts, assistance from the IT Department is required.[28]

11. The IT Department is able to perform keyword searches in order to create a pool of possibly-responsive data for a given data request.[29] This data must then be reviewed by County Administrator Fry or the County Attorney's office in order to ascertain (1) whether it is, in fact, responsive to the request in question and (2) whether it contains any data that cannot be provided under law.[30]

12. The County's policy was to require a fee of $.25 for every copy of a document a requester made, including creating the copy with their own camera.[31][32]

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[20] Test. Fry.
[21] Test. Fry.
[22] Test. Fry.
[23] Test. Fry.
[24] Test. Fry.
[25] Test. Fry.
[26] Test. Fry.
[27] Test. Fry.
[28] Test. Fry.
[29] Test. Fry.
[30] Test. Fry.
[31] The County admitted that telling requestors it would charge a fee for taking photographs of government data violated Minn. Stat. § 13.03, subd. 3.
[32] *Also see* Steele County's Post-Hearing Brief at 3 (discussing the fact that the County had already conceded the violation on this issue).

II. Requests for Data and Responses at Issue

A. ESC Communications Request

13. On October 25, 2024, Complainants requested from the County the following data:

> Any and all email correspondence since 2019 related in any way to the East Side Corridor (ESC) Project, 29th Ave, East Beltline study, and infrastructure on the E. Side of Owatonna, going to, from and between:
>
> - County commissioners
> - County staff
> - City council members
> - City staff
> - 3rd parties (including but not limited to WSB)
> - To and from any of the above and members of the public
>
> In addition, please provide any and all documents, studies, and information related to the East Side Corridor (ESC) project, 29th Ave, East Beltline study, and infrastructure on the E. Side of Owatonna *not currently (as of today) on the public-facing county website:* https://eastsidecorridor-wsbeng.hub.arcgis.com/
>
> This would include but is not limited to information used in determining the purpose and need for the East Side Corridor, 29th Ave East beltline study and infrastructure on the E. Side of Owatonna. Also, any information and documentation related to commercial developments in the area of the proposed East Side Corridor "preferred route" and "study area". This also includes any and all email correspondents[sic] between City and county officials, staff and third parties.[33]

14. Initial responses to this request from the County estimated that it "will likely need several weeks to assemble everything."[34] As a result, the parties organized that the October 25, 2024, data request would have rolling partial responses from the County, based on priorities set by the Complainants.[35]

15. The IT Department's initial searches for relevant data generated over 7600 items that required further review.[36] As of the October 2025 hearing dates, just over a year after the October 25, 2024 data request, rolling partial releases of responsive data

[33] Ex. 1 at ESC-1 - ESC-2.
[34] Ex. 27 at ESC-167.
[35] *See* Exs. 26-27.
[36] Ex. 26 at ESC-158.

by the County continue.[37] To date three releases of data have been completed by the Respondent.[38]

16. There has been conflict and confusion between the parties over multiple aspects of these reviews. These issues have included technical issues with the computers and software used to review the data and conflict over scheduling, availability, and locations for the reviews.[39]

17. These issues have stemmed from factors outside of either parties' control – such as technical issues with software or computers – or from confusion or miscommunication regarding dates, times, and places.[40]

B. Engineering Service Proposals Data Request

18. On January 13, 2025, Complainants requested:

> copies of the professional engineering service proposals for the East Side Corridor. These proposals should have been included in the commissioners' board meetings packet which is available online for the 12/14/2021 meeting, as is standard for all other projects. However, they appear to be missing.[41]

19. On January 16, 2025, County Attorney Jarrett informed Complainants that their request was ready to be picked up at the County Attorney's Office or via electronic delivery, and that the cost of the copies would be $12.50 for 50 pages total.[42]

20. Complainants paid the County $12.50 on January 22, 2025.[43]

C. Joint Transportation Committee Request

21. On January 31, 2025, Complainant Melissa Zimmerman emailed County Administrator Fry stating that she was "looking for the meeting minutes from the Joint Transportation Committee meeting referenced in the board meeting minutes."[44] After determining that County Administrator Fry was out of the office until February 10, 2025, and contacting another County staff member, her email was forwarded to County Attorney Jarrett.[45]

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[37] Test. Fry.
[38] Test. Fry.
[39] Testimony of Melissa Zimmerman (Test. Zimmerman); Testimony of Matthew Sennott (Test. Sennott); Test. Fry; *See generally* Exs. 26-28 (showing a large number of emails between the parties attempting to negotiate and coordinate the timelines and data inspections involved in this request).
[40] Test. Zimmerman; Test. Sennott; Test. Fry.
[41] Ex. 2 at ESC-7.
[42] Ex. 2 at ESC-8 – ESC-9.
[43] Ex. 100H.
[44] Ex. 3 at ESC-14; Ex. 100C.
[45] Ex. 3 at ESC-12-13; Ex. 100C.

22. On February 4, 2025, County Attorney Jarrett replied stating in relevant part that 1) "[f]rom this point forward, please direct any requests for documents/questions regarding the East Side Corridor to only myself and [County Administrator]. Fry. We will track the requests, provide data in the order it was requested, and in compliance with the Chapter 13 Government Data Practices Act" and 2) "Related to your request below for 'Joint Transportation Committee' minutes, Steele County does not maintain those minutes, so therefore does not have the minutes to provide you."[46]

23. On March 31, 2025, Complainant Zimmerman sent the County a second data request relating to the "Joint Transportation Committee."[47] The form stated:

> I am requesting any and all information regarding the Joint Transportation Committee including but not limited to:
> When was it created?
> Why was it created?
> Who created it?
> What is its purpose?
> What are the by-laws or operating procedures?
> How many members?
> Member names and terms?
> When does it meet?
> Attendance Information?
> What projects and initiatives has it worked on?
> Financial information and budget impacts?
> Committee's charter or purpose and any amendments?
> Minutes, Agendas, Files, Accounts, and any other documents that a governmental body is required to maintain?
>
> And any other information that may pertains[sic] to the Joint Transportation Committee.[48]

24. On April 1, 2025, County Attorney Jarrett replied by email, stating: "This is not a data request. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format in order to answer questions. This request will be closed."[49]

25. On April 2, 2025, Complainant Zimmerman sent the County another data request form that was identical to the March 31, 2025, request, except all question marks had been deleted.[50]

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[46] Ex. 3 at ESC-12; Ex. 100C.
[47] Ex. 3; Ex. 100D.
[48] Ex. 3; Ex. 100D.
[49] Ex. 100E
[50] *Compare* Ex. 5 at ESC-17 – ESC-18 *with* Ex. 3 at ESC-10 – ESC-11.

26. On April 8, 2025, County Administrator Fry observed Complainant Zimmerman in conversation with County Commissioner Krueger.[51] County Administrator Fry heard Commissioner Krueger explain to Complainant Zimmerman that the Joint Transportation Committee was "not a body of Steele County, it is not a committee where there is a quorum present of either Steele County Board members or City of Owatonna City Council members."[52]

27. On April 10, 2025, and April 14, 2025, Complainant Zimmerman followed up with County Attorney Jarrett by email, requesting confirmation of receipt or updates regarding the April 2, 2025 data request.[53]

28. On April 18, 2025, Complainant Zimmerman sent a third copy of the data request to both the County and the Administrator of the City of Owatonna. It was identical to the April 2, 2024, request, and the form explicitly noted that it was a resubmission of the prior request.[54]

29. County Attorney Jarrett did not reply to any of Complainant Zimmerman's follow up emails because he did not believe they were proper data requests, but rather sought answers to questions. Moreover, Jarrett "had already informed Complainant Zimmerman that the County did not maintain data on the Joint Transportation Committee."[55]

D. Noise Studies Data Request

30. On April 2, 2025, Complainant Zimmerman sent another request for data to the County, stating:

> I am requesting copies for inspection of all noise studies conducted for the East Side Corridor (ESC) project that were initiated on or after January 1, 2020. This includes, but is not limited to, initial assessments, updated analyses, modeling data, and any related reports or documentation. Please provide both draft and final versions, along with any supporting materials used in these studies.[56]

31. Complainant Zimmerman followed up on the request with County Attorney Jarrett by email on April 10, and April 14, 2025.[57]

[51] Test. Fry.
[52] Test. Fry.
[53] Ex. 5 at ESC-19 – ESC-20.
[54] Ex. 100D; Test. Fry (identifying the City of Owatonna official who received the data request).
[55] Ex. 100 at 5.
[56] Ex. 100F; Ex. 6 at ESC-22.
[57] Ex. 100G; Ex. 6 at ESC-23 – ESC-24.

32. The County looked for responsive data by having Paul Sponholtz, a county engineer who was familiar with the East Side Corridor Project, search through emails and records.[58]

33. On April 18, 2025, County Attorney Jarrett replied that "[t]he county does not have any studies or documents related to a noise study for the east side corridor at this time. Since no such data exists at this time, this data request will be closed."[59]

34. Complainant Zimmerman responded by email noting that public statements about relevant noise studies had been made by the County in the past and requesting further review for relevant data.[60] The County provided no response to the follow up email.[61]

E. Transfer of Federal Funds Request

35. On April 9, 2025, Complainants sent a data request to the County requesting to inspect:

> Any and all information relating to the transfer of federal funds from the ESC to the Main St Project. This includes all documentation, emails, written correspondence, text messages, government records, audio or video recordings, and any other data related to the transfer of these funds. Person of correspondence may include but are not limited to ATP members, Paul Sponholtz, Sean Murphy, and County Commissioner, City council, County Administrator, and City Administrator.[62]

36. On April 10, 2025, at 7:41 a.m., County Attorney Jarrett replied via email saying "Received. We begin this following the general ESC requests which is still pending. I suspect it will be several months, likely this fall, before it is ready."[63]

37. At 8:24 a.m. on that same day, County Attorney Jarrett mistakenly sent a second email to Zimmerman. The email was regarding a different data request, and so indicated to Zimmerman that Jarrett had changed his mind on the request for data on the transfer of federal funds. The message stated:

> Ms. Zimmerman, This is not a data request as it is vague and calls for answers to questions. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create

[58] Test. Fry.
[59] Ex. 100G; Ex. 6 at ESC-23.
[60] Ex. 6 at ESC-23.
[61] Ex. 100 at 6.
[62] Ex. 7 at ESC-25; Ex. 100I.
[63] Ex. 7 at ESC-31; Ex. 100J.

data, or to reorganized data into a particular format in order to answer questions.[64]

County Administrator Fry was included as a recipient on this email.[65]

38. Ms. Zimmerman replied to the second email at 8:53 a.m., stating "No, this is absolutely not vague, and there is no ambiguity whatsoever in this request. Just moments ago, you confirmed it was accepted – what changed? This data request is detailed, precise, and explicitly cites the applicable law. You are required to cite the exact provision of Minnesota Chapter 13 that you claim this request fails to meet."[66] Neither this email nor a second follow up about this data request sent on April 14, 2025, received a reply.[67]

39. County Attorney Jarrett did not realize the mistake had been made until a meeting with the County's representation in this case shortly before the hearing.[68]

40. The County has not provided the data requested to the Complainants.[69]

F. County Codes and Policies Data Request

41. On May 6, 2025, Complainants sent the County a data request form requesting inspection of:

1. Any current Code of Conduct applicable to county officials, employees, or board/commission members.

2. Any adopted Code of Ethics governing the actions and responsibilities of county personnel or officials.

3. Steele County's Conflict of Interest Policy for elected officials, employees, and appointed representatives.[70]

It also stated that "If these documents are already available online, a link to them would be appreciated. Otherwise please provide electronic copies."[71]

42. On May 8, 2025, County Attorney Jarrett replied by email stating "[r]eceived. This will be added to the current list of requests made by your group. Estimated this fall/winter."[72]

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[64] Ex. 7 at ESC-33.
[65] Ex. 7 at ESC-33.
[66] Ex. 7 at ESC-32.
[67] Ex. 7 at ESC-32;
[68] Test. Fry.
[69] Test. Fry.
[70] Ex. 11 at ESC-50.
[71] Ex. 11 at ESC-50.
[72] Ex. 11 at ESC-55.

43. On September 30, 2025, County Attorney Jarrett replied again by email, with several attachments. Jarrett stated that the attachments to his email were the County's full reply to the request, and that it would now be closed.[73] No charge was assessed for the digital copies.[74]

G. Communications with Township Data Request

44. Complainants sent another data request to the County on May 6, 2025.[75] This request was for:

> Any and all correspondence, meeting notes, emails, letters, or other communications between Steele County and any township or township officials regarding the East Side Corridor (ESC) project or related annexation matters. This includes, but is not limited to:
>
> - Objections or concerns raised by township representatives
> - Records of township approvals, statements of support, or formal positions
> - Internal or external memos discussing township responses
> - Any documentation regarding the orderly annexation agreement, including discussions related to specific parcels
> - Documentation and notes from any meetings occurring with the township
>
> The timeframe for this request is from January 1, 2021, to the present. Please advise if these records are available electronically or if any estimated costs would apply for physical copies. I am willing to clarify or narrow the scope as needed to facilitate a prompt response.[76]

45. On May 8, 2025, County Attorney Jarrett emailed: "Received. This will be added to the current list of requests made by your group. Estimated this fall/winter."[77]

46. The County has not provided the data requested to Complainants.[78]

H. Truck Traffic Data Request

47. On May 29, 2025, Complainants sent a data request to the County requesting:

> 1. Any and all traffic studies, reports, or raw traffic count data for Shady Avenue and Crestview Lane NE, with a particular focus on truck

[73] Ex. 11 at ESC-56 – ESC-57; Ex. 100K.
[74] *Id*.
[75] Ex. 12.
[76] Ex. 12 at ESC-58 – ESC-59.
[77] Ex. 12 at ESC-63;
[78] Test. Fry.

traffic volumes (e.g. counts, classifications, or percentages of heavy vehicles) currently using these roads. Please include the most recent data available, as well as historical data if relevant for comparison.

2. Any projections, Impact analyses, or modeling related to the East Side Corridor (ESC) that estimate or forecast how truck traffic on Shady Ave and Crestview Ln NE would be reduced or diverted if the ESC is built. This includes traffic modelling results, assumptions used, summary tables, and visualizations or GIS data if available.

3. If no such analysis exists regarding projected truck traffic reduction due to the ESC on these roads, please provide documentation showing that the roads were considered (or not considered) in the ESC traffic impact modeling.[79]

48. County Attorney Jarrett confirmed receipt via email on the same day, stating "We received the data request. We have several ESC requests pending, so this will be added to the pending requests. If the data exists, it will not be completed until this fall due to current volume of requests."[80]

49. On June 10, 2025, County Attorney Jarrett sent Complainants a full response to the May 29, 2025, data request, which said:

> We do not have any documentation related to this data request. As such, the request will be closed.
>
> A response from Paul:
>
> All we have is staff recollection of numerous phone calls of complaints over the years, and comments received from the public during the East Side Corridor public meetings. Also, I reviewed the state traffic counts, they don't show anything on their website traffic mapping application.
>
> Paul Sponholtz, P.E. | County Engineer.[81]

50. Any Conclusion of Law more properly designated as a Finding of Fact is incorporated herein.

51. Any portion of the accompanying Memorandum that is more properly considered a Finding of Fact is incorporated herein.

Based on these Findings of Fact, the Judge makes the following:

[79] Ex. 15 at ESC-76.
[80] Ex. 15 at ESC-82.
[81] Ex. 15 at ESC-81.

CONCLUSIONS OF LAW

1. Minn. Stat. § 13.085 authorizes the Administrative Law Judge to consider this matter and determine whether a violation of the MGDPA[82] occurred.

2. The Court of Administrative Hearings has complied with all procedural requirements under Minn. Stat. § 13.085. Both parties had proper notice of the hearing and an opportunity to be heard.

3. The decision record comprises all evidence and argument submitted until the hearing record closed.[83]

4. Requests for data and associated responses that took place after the Complaint was filed in this matter are beyond the scope of these proceedings.[84]

5. The MGDPA "regulates the collection, creation, storage, maintenance, dissemination, and access to government data in government entities."[85]

6. "Government data" means "all data collected, created, received, maintained or disseminated by any government entity regardless of its physical form, storage media or conditions of use."[86]

7. Respondent is a "government entity" subject to the requirements of the MGDPA.[87]

8. The MGDPA provides that all government data collected, created, or maintained by a government entity shall be public unless classified by statute or federal law as nonpublic or protected nonpublic, or with respect to data on individuals, as private or confidential.[88]

9. A "responsible authority" is a designated individual within a government entity responsible for the collection, use, and dissemination of government data.[89] A "designee" is "any person designated by a responsible authority to be in charge of individual files or systems containing government data and to receive and comply with requests for government data."[90]

10. Government entities and their responsible authority have an obligation to regularly update their written data access policies "no later than August 1 of each year,

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[82] Minn. Stat. §§ 13.01–.991.
[83] Minn. Stat. § 13.085, subd. 4(b).
[84] Minn. Stat. § 13.085, subd. 5(a) (limiting the Judge's final determination following an evidentiary hearing to violations "alleged in the complaint.").
[85] Minn. Stat. § 13.01, subd. 3.
[86] Minn. Stat. § 13.02, subd. 7.
[87] Minn. Stat. §§ 13.01, subd. 1, .02, subd. 7a.
[88] Minn. Stat. § 13.03, subd. 1.
[89] Minn. Stat. § 13.02, subd. 16.
[90] Minn. Stat. § 13.02, subd. 6.

and at any other time as necessary to reflect changes in personnel, procedures, or other circumstances that impact the public's ability to access data."[91]

11. Upon request, a responsible authority or designee shall permit a person to inspect and copy public government data at reasonable times and places. If access to public data is requested for purposes of inspection the responsible authority cannot assess a charge or fee for that inspection.[92]

12. The responsible authority in every government entity "shall establish procedures . . . to insure that requests for government data are received and complied with in an appropriate and prompt manner."[93]

13. In responding to requests for data, "when the procedures are followed and the requested data are not made available appropriately or promptly, the 'established procedures' do not *insure* that government data are properly available."[94] A single inappropriate or not prompt response is sufficient to support a violation of the MGDPA.[95]

14. Complainants bear the burden of proof to establish by a preponderance of the evidence that Respondent violated the MGDPA.[96]

15. The County's procedure of charging an individual who requested access to public data for purposes of inspection a fee should the individual take any photos of the data violated Minn. Stat. § 13.03, subd. 2(a).

16. The County's procedure of addressing requests for government data exclusively in the order in which they were received resulted in responses to the Complainants' requests for public data to not be promptly and appropriately complied with, in violation of Minn. Stat. § 13.03, subd. 2(a).

17. The County provided Complainants with inappropriate responses to requests for government data in violation of Minn. Stat. § 13.03, subd. 2(a) on two occasions.

18. Where the Judge has determined that a violation of the MGDPA occurred, they must take at least one of the following actions:

(1) impose a civil penalty against the respondent of up to $300;

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[91] Minn. Stat. § 13.025, subd. 2.
[92] Minn. Stat. § 13.03, subd. 3(a).
[93] Minn. Stat. § 13.03, subd. 2(a).
[94] *Webster v. Hennepin Cnty.*, 910 N.W.2d 420, 431 (Minn. 2018).
[95] *Webster*, 910 N.W.2d 420.
[96] Minn. R. 1400.7300, subp. 5 (2025). Under Minn. Stat. § 13.085, subd. 5(d), proceedings on a data practices complaint are not a contested case under Minn. Stat. ch. 14; however, the Administrative Law Judge determines that Minn. R. 1400.7300, subp. 5, articulates the correct burden of proof for a data practices case as no other standard is identified in Minn. Stat. § 13.085.

(2) issue an order compelling the respondent to comply with a provision of law that has been violated, and may establish a deadline for production of data, if necessary; and

(3) refer the complaint to the appropriate prosecuting authority for consideration of criminal charges.[97]

19. In determining whether to assess a civil penalty, this tribunal must consider whether the governmental entity has substantially complied with general data practices, including but not limited to, whether the governmental entity has:

(1) designated a responsible authority under Minn. Stat. § 13.02, subd. 16;

(2) designated a data practices compliance official under Minn. Stat. § 13.05, subd. 13;

(3) prepared the data inventory that names the responsible authority and describes the records and data on individuals that are maintained by the government entity under Minn. Stat. § 13.025, subd. 1;

(4) developed public access procedures under Minn. Stat. § 13.03, subd. 2; procedures to guarantee the rights of data subjects under Minn. Stat. § 13.025, subd. 3; and procedures to ensure that data on individuals are accurate and complete and to safeguard the data's security under Minn. Stat. § 13.05, subd. 5;

(5) acted in conformity with an opinion issued under Minn. Stat. § 13.072 that was sought by a government entity or another person; or

(6) provided ongoing training to government entity personnel who respond to requests under this chapter.[98]

20. Based on the record, the factors in Minn. Stat. 13.08, subd. 4(b) listed above and for the reasons discussed in the attached memorandum, the Judge concludes that a civil penalty of $300 is appropriate.

21. The Complainants in this matter have substantially prevailed. As a result, the Court of Administrative Hearings must refund the filing fee in full, less $50, and the Court's costs in conducting the matter are billed to the respondent, not to exceed $1,000.[99]

22. Any Finding of Fact more properly considered to be a Conclusion of Law is adopted herein.

23. Any portion of the accompanying Memorandum that is more properly considered to be a Conclusion of Law is incorporated herein.

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[97] Minn. Stat. § 13.085, subd. 5(a).
[98] Minn. Stat. §§ 13.08, subd. 4(b), .085, subd. 5(b).
[99] Minn. Stat. § 13.085, subd. 6(c).

Based upon these Conclusions of Law, and for the reasons explained in the accompanying Memorandum, the Judge makes the following:

ORDER

1. Pursuant to Minn. Stat. § 13.085, subd. 5(a)(4), the County must maintain procedures that ensure appropriate responses to data requests, and in so doing:

   a. Ensure appropriate ongoing communication with the public about pending data requests; and,

   b. Mitigate or avoid circumstances where the Responsible Authority, or a Designee, are, in practice or effect, the only check on their own errors, misunderstandings, or miscommunications.

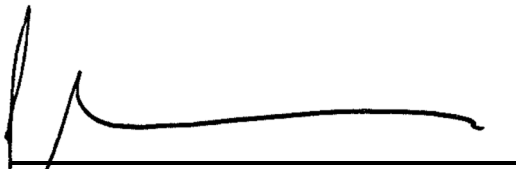
2. Pursuant to Minn. Stat. §§ 13.085, subd. 5(a)(3) and 13.08, subd. 4(b), the County shall pay a civil penalty of $300.

3. Pursuant to Minn. Stat. § 13.085, subd. 6(c) the Court will refund $950 of Complainant's filing fee.

4. Pursuant to Minn. Stat. § 13.085, subd. 6(c) the County must reimburse the Court for its costs in conducting this matter, as documented in an invoice to be sent by the Court to Respondent.

5. All other requests for relief are hereby dismissed.

Dated: November 24, 2025



CHRISTA L. MOSENG
Administrative Law Judge

Reported: Digitally Recorded
No transcript prepared

NOTICE

This Order is the final decision in this case. Any party aggrieved by this decision may seek judicial review pursuant to Minn. Stat. §§ 14.63-.69 (2024).

MEMORANDUM

I. Introduction

These proceedings arise out of a Complaint alleging that the County violated the MGDPA. The procedural history of this case is involved; a detailed discussion of the Complaint and the County's initial Response can be found in the September 15, 2025, Probable Cause Determination in this matter.[100]

Between October 2024, and July 2025, Complainants sent the County a dozen requests for government data which generally concerned a municipal project known as the East Side Corridor Project.[101] Each request resulted in communications about the request.[102] Evincing frustration, the data requests evolved to include text colored red for emphasis and significant boilerplate: preemptive clarifications, demands, statutory citations, and legal argument.[103] Complainants also sought information directly from other county staff and officials, outside of the formal data practices process established by the County. The County, in turn, required Complainants' data requests be made directly to the County Attorney and County Administrator.

The parties also detailed considerable work arising out of the requests. Complainants produced hundreds of pages documenting their work on the requests.[104] The County also devoted many hours of work over many months and across multiple departments to respond to the requests—work which continues today.[105]

In total, the record shows nine requests for data made by the Complainants (not counting repeated submissions of the same request) between October, 2024, and May, 2025.[106] The County is currently continuing to work on providing complete, responsive datasets for three of the requests.[107] Two have been completed with all responsive data provided.[108] The remaining three have been closed because the County possessed no responsive data.[109]

Two issues remained for hearing after the probable cause determination:

a. Charging a fee for inspection of public data, in violation of Minn. Stat. § 13.03, subd. 3, in response to an October 25, 2024 data request.

b. Failure to establish a procedure, consistent with the Act, to insure that all requests for government data are received and complied with

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[100] *See* Notice of Probable Cause Determination, and Order for Prehearing Conference at 2.
[101] *See generally* Exs. 21-36 (showing emails and transcripts of conversations between the parties relating to the facts of the case); Complainants' Closing Argument at 3.
[102] *See, e.g.* Ex. 1, ESC-3 – ESC-6.
[103] See, e.f., Ex. 12, ESC 58 –62 (a data request that takes less than one-half page to describe, cushioned by four-and-a-half pages of additional material).
[104] *See* Ex. 9.
[105] Test. Fry.
[106] *See, e.g.,* Complainant's Closing Argument at 3 (showing a table of all data requests involved in this matter, along with their data preservation request and the requests sent after the Complaint was filed.).
[107] Test. Fry.
[108] *See* Complainants' Closing Argument at 3.
[109] Test. Fry; *also see* Complainants' Closing Argument at 3.

in an appropriate and prompt manner, in violation of Minn. Stat. § 13.03, subd. 2(a).

At the hearing, the County conceded that it violated Minn. Stat. § 13.03, subd. 3,[110] by telling Complainants that it would charge a fee for photographing data made available for inspection, the County ultimately never charged the fee.

The sole issue that remains for substantive analysis, then, is whether the County violated Minn. Stat. § 13.03, subd. 2(a).

II. Applicable Law

The Minnesota Government Data Practices Act "governs the storage of government data and public access to that data."[111] Members of the public who want to inspect or copy public government data submit a request to do so to the relevant responsible authority or designee.[112] Responsible Authorities must, in turn, "establish procedures . . . that insure requests for government data are received and complied with in an appropriate and prompt manner."[113] The act only requires that procedures be 'established', and does not require that they be in any particular form, or even that they be written down.[114]

The question before this Court, then, is not whether every response to a data request was appropriate and prompt—though this would be relevant. Rather, the law requires that 1) "government data be made available" and 2) "that personnel responsible for making it available establish procedures that ensure it is made available."[115]

The MGDPA places significant burdens on government entities. At the same time, the weight of those burdens speaks to the import the Legislature has placed on the access to data the MGDPA requires. To balance these appropriately, both the Court of Administrative Hearings and the Commissioner of the Department of Administration have concluded that the requirement for prompt and appropriate responses to data requests does not have a mechanical or rote application. Rather, an assessment may consider factors such as: the scope or complexity of the data requested, the resources available to respond to the requests, and the government entities' communications with requestors while work on the requests takes place.[116]

III. Analysis

Complainants alleged facts that met the probable cause threshold with respect to three of the County's procedures. First, the County told Complainants it would charge a

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[110] If a person requests access to data "for the purpose of inspection, the responsible authority may not assess a charge or require the requesting person to pay a fee." Minn. Stat. § 13.03, subd. 3(a).
[111] *Webster*, 910 N.W.2d at 427.
[112] *Id*.
[113] Minn. Stat. § 13.03, subd. 2(a)).
[114] *Webster*, 910 N.W.2d at 432.
[115] *Webster*, 910 N.W.2d at 431.
[116] *See, e.g.* Depart. Admin. Adv. Ops. 14-003 (Apr. 23, 2014) (University of Minnesota); *and In the Matter of Timothy J. Coughlin vs. City of Deerwood and Deerwood Police Department*, No. 22-0305-39381, FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER (Minn. Court of Admin. Hearings Nov. 17, 2023).

fee for photographs taken by Complainants of data made available for inspection—which the County concedes violated the MGDPA. Second, the County initially maintained a procedure of responding to data requests from Complainants only in the order in which they were received. Third, the County required all of Complainants' communications regarding requests for data and the East Side Corridor Project be sent to County Attorney Jarrett and County Administrator Fry.

A. Ordering of County Responses to Multiple Data Requests

Complainants sent the County twelve distinct data requests in approximately a 10-month span. These requests ranged from extremely wide-ranging (such as the first, sent on October 25, 2024) to very small and precise (such as the May 6, 2025, request for three specific policy documents). In his reply acknowledging receipt of Complainants' April 9, 2025, data request, County Attorney Jarrett informed Complainants that the County would "begin [work on] this following the general ESC requests which is still pending. I suspect it will be several months, likely this fall, before it is ready."[117] Similar language regarding the existence of prior data requests from Complainants and a lengthy wait time for completion—couched in terms of months or seasons—also appear in the County's receipt acknowledgements of multiple subsequent requests.[118] For example, the County (1) predicting that a request for three ostensibly public-facing documents made on May 6, 2025, would be satisfied by "estimated this fall/winter," after other, larger requests were satisfied and (2) providing three pdfs on September 30, 2025. [119] These responses were neither prompt nor appropriate.

Despite statements regarding the order in which the County would respond to the Complainants' data requests, however, the record shows that responses were produced in a more flexible fashion and that the County improved its practices through the course of dealing with Complainant's requests. Data, or responses that no data exists, were provided to a total of five requests while work on the first, and largest, request continued.

County Administrator Fry testified that while the First-In-First-Out procedure was important for maintaining coordinated and orderly tracking, work, and responses—particularly for large requests that required relying on an information technology staffing resource that proved to be a bottleneck—it was not being applied as a mechanical requirement.[120]

As a result, what appears to be at issue more than the County's ordering of responses is the County's lack of effective or ongoing communication with Complainants regarding their data requests. Appropriate responses to data requests with lengthy response times should generally include *providing the requestors with updates*.[121] The record does not show a single update from the County to Complainants regarding the status of an initial request beyond acknowledgements of receipt, even when

[117] Ex. 7 at ESC-31.
[118] *See* Exs. 11, 12, *and* 15.
[119] Ex. 11 at ESC-55.
[120] Test. Fry.
[121] *See* Dept. Admin. Adv. Op. 14-003 (Apr. 23, 2014 (University of Minnesota) (discussing how response to a request for data may still be appropriate and prompt despite a wait time of five months as a result of the complexity of the request and "continual communication" with the requester about their request.).

circumstances warranted revising the timeline for production. This lack of communication, rather than the County's ordering procedure, failed to meet the County's obligation to make appropriate responses to requests.

Going forward, rather than acknowledging receipt and ignoring subsequent contact, as the County appeared to do in this case, the County's procedures must contemplate ongoing communication with the public about pending data requests, particularly when new or better information could affect an earlier-communicated anticipated-completion timeline. Simply articulating the reason for prolonged response time or delay could inform requestors' expectations and forestall future complaints.

B. Communication with County Attorney Jarrett and County Administrator Fry

The MGDPA explicitly requires that requests for government data be made *only* to the Responsible Authority for a given government entity, or their Designee.[122] At the same time, the Responsible Authority and their Designee are required by the Act to establish procedures that ensure appropriate and prompt responses to such requests.[123]

County Attorney Jarrett is the Responsible Authority for the County under the MGDPA, and the County's Data Practices Compliance Officer.[124] County Administrator Fry is the formal Designee under the MGDPA for the County's Administration department.[125]

The record of Complainants' communications with County Attorney Jarrett shows multiple responses, or lack thereof, to their requests for data that were entirely inappropriate. In the worst instances, those decisions resulted in County Administrator Fry providing a final response or novel update during her testimony.

The record of communication between County Attorney Jarrett and the Complainants is sparing. However, the record shows a pattern of construing Complainants' data requests uncharitably to excuse minimal communication and disregard for legitimate data requests and requests for updates from Complainants.

Specifically, County Attorney Jarrett closed a data request initially made on March 31, 2025, with the following reason, in substantive part: "This is not a data request. . . . . Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format to answer questions. This request will be closed." Complainants resubmitted the request, after revising it in an attempt to satisfy the thrust of the County's response by removing the question marks.

[122] Minn. Stat. § 13.03, subd. 3(a); *also see Scheffler v. City of Anoka*, 890 N.W.2d 437, 447 (Minn. 2017) (holding in part that in order for the MGDPA to have been violated, a request for data must have been made to either the Responsible Authority or their Designee).
[123] Minn. Stat. § 13.03, subd. 2(a).
[124] Ex. 100A at 33; Ex. 37 at ESC-278.
[125] Ex. 100A at 33; Ex. 37 at ESC-278.

County Attorney Jarrett again closed the request, stating: "This is not a data request as it is vague and calls for answers to questions."[126]

These responses were not appropriate.[127] Ignoring other communications about the request, including attempts to clarify or resubmit the March 31 request, was also not appropriate. These responses and non-responses were inappropriate because, first, the data request on its face is not vague and the "questions" included were precatory and superfluous to a clearly stated data request: "any and all information regarding the Joint Transportation Committee including but not limited to…."[128] Second, even if the request were vague, closing the request immediately without seeking clarification—and ignoring subsequent clarifications and communications about the request—was, in this instance, inappropriate. The County's response was inappropriate because it construed the data request unfavorably, in a light favoring expeditious summary disposition, and contrary to the purposes of the MGDPA.

The record does not show that County Attorney's Jarrett's responses to this request were the result of an established procedure for responding to data requests, except inasmuch as the procedure provided that that the request would be received and evaluated personally by County Attorney Jarrett. The failure to meaningfully respond to attempts to clarify the request, even if the County believed them to relate back to a previously addressed request, demonstrates that the County's procedures failed to ensure appropriate responses to those requests.

Additionally, standing alone, the County mistakenly sending a response intended for another pending request is understandable. The volume of communications and pending requests could easily yield an intended reply sent in an inapposite email thread. However, County Attorney Jarrett received multiple replies to his errant email response, requesting more explanation and discussing a different, conflicting response. The Responsible Authority ignored this apparent confusion, which he inadvertently created, for months. These choices resulted in Complainants mistakenly believing a data request had been closed entirely. County Administrator Fry clarified at hearing that, instead, the request was still open with the County and work on a final review of responsive documentation was underway.[129] This, again, was too little and far too late.

The record demonstrates a pattern of responses inappropriate under the MGDPA. This pattern was a consequence of a procedure that seemingly allowed the Responsible Authority to be, in apparent effect, the only check on his own errors, misunderstandings, or miscommunications in the context of an ongoing relationship with multiple active data requests and in which tensions had escalated. Accordingly, to ensure the compliance with

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[126] *See, e.g.* Steele County's Post-Hearing Brief at 8, 10; *and* Exs. 100E, E-217 Ex. 7, ESC-33. The County attorney inadvertently sent this response to a different data request, causing additional confusion among the parties. Test. of Fry. The record offers no *direct* insight into which request County Attorney Jarrett intended this response for. Of the requests pending at the time, it is more likely than not that this response was intended to relate to the March 31 request. Respondent Zimmerman emailed Jarrett at 8:16 a.m. on April 10, 2025, about receiving no response to an attempt to clarify the March 31 data request, and Jarrett sent this email at 8:24 a.m. on the same day.

[127] Ex. 100D, E-217

[128] Ex. 100D, E-205.

[129] Test. Fry.

Minn. Stat. § 13.03, subd. 2(a), the Judge will require the County to maintain procedures that ensure appropriate responses to data requests and, in so doing, address this specific shortcoming.

This requirement is intentionally phrased broadly to ensure that the County has maximum flexibility to address the issue in light of its resource constraints and without impairing the Responsible Authority's ability to carry out the responsibilities and duties of that role. This Judge contemplates a segregation of duties or internal monitor to provide stronger internal quality control over data practices responses, as an entity might implement to avoid a single point of failure in financial controls.[130] But it would be inappropriate be overly prescriptive about the best manner of implementing such internal control, or which particular circumstances require the additional eyes. The County's decision to employ an attorney whose responsibilities will include data practices reflects a good faith effort toward mitigating this specific source of MGDPA violations. That role will likely be an essential component of any procedure that satisfies the MGDPA's mandate

IV. Civil Penalty

After consideration of the factors listed in Minn. Stat. § 13.08, subd. 4(b), the Judge concludes that a $300 civil penalty under Minn. Stat. § 13.085, subd. 5(a)(3) is appropriate. The record shows that the County has designated both a Responsible Authority as well as a data practices compliance official. The County also has published current data inventory and public access procedures documents, though the record also establishes that those documents had been out of date since approximately 2020 prior to these proceedings, including showing entirely incorrect names for the relevant officials.[131] The Department of Administration did not issue an advisory opinion under Minn. Stat. § 13.072 regarding these requests. The County's ongoing training regarding MGDPA requirements reflects improvements since these proceedings began but were inadequate until the challenges presented by these data requests made their inadequacy apparent: relevant personnel have recently provided inappropriate responses to requests made under the Act.

As a result of these facts and the record as a whole, the Judge concludes that a civil penalty is warranted. The record establishes multiple violations of the MGDPA and inappropriate responses by the County in addressing the Complainants' data requests. It is laudable that the County has proactively addressed many of those issues, such as concluding it could not charge a fee for photographs of inspected data and improving its flexibility to respond to requests of varying size. However, the changes implemented during the pendency of these proceedings does not negate that the violations occurred. Similarly, mistaken or inappropriate data request responses by County Attorney Jarrett left Complainants without meaningful updates or responses to multiple requests until the hearing on their Complaint. As a result, a civil penalty is appropriate in this case.

[130] The Judge notes that it is likely that County Administrator Fry was copied on the emails sent by County Attorney Jarrett. However, the record demonstrates that she did not effectively serve as a check on the erroneous or inappropriate emails.
[131] *See* Minn. Stat. § 13.025, subd. 3; Test. Zimmerman; Test. Fry.

V. Conclusion

The miscommunication and adverse posture that developed between the parties became so fraught at times that it entirely obscured each party's good faith efforts to engage with the requirements of the MGDPA. Despite clear improvement in its practices during the course of these requests, the County's responses to the Complainants' requests failed to be appropriate on multiple occasions. The inappropriate responses were a consequence of a procedure that provided no mechanism to ensure that the County identified errors or misunderstandings by the Responsible Authority before they grew into conflict.

Complainants' communications with the County undoubtedly contributed to the adversarial atmosphere, including their use of a bespoke data request form that opens with bright red letters declaring "WE ARE FULLY EDUCATED, PREPA[]RED, WILLING, EXPERIENCED, AND VICTORIOUS IN COURT ACTIONS TO FORCE COMPLIANCE AND RECOUP CIVIL MONITARY DAM[A]GES FOR NONCOMPLIANCE!"[132] Nevertheless, conflict or an adversarial posture taken by data requestors (here, apparently taken in response to growing frustration with inappropriate responses from the County) does not relieve the County of its obligation to respond to properly submitted data requests appropriately.

The record indicates the County has, and continues to, work diligently to produce any and all data responsive to Complainants' open requests. The workload created by the requests, together with mutual miscommunications and misunderstandings, caused strain that highlighted weaknesses in the County's processes. As a consequence, the record shows that the County's processes failed to meet the requirements of the MGDPA. The County neglected to provide ongoing, timely updates regarding the status of data requests and failed to incorporate a means of validating the propriety of responses to requests. These violations warrant an order for compliance and a civil penalty, as articulated above.

C. L. M.

[132] *See, e.g.* Ex. 7 at ESC-25.

Comment #48

Date: December 13, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: EAW COMMENT – WITHHELD NOISE STUDY / INCOMPLETE RECORD

I submit this comment to document that **project-specific traffic noise studies prepared for the East Side Corridor / 29th Avenue project exist, were relied upon by Steele County and its consultant (WSB), but were not disclosed to the public during the Environmental Assessment Worksheet (EAW) process**, rendering the EAW incomplete and preventing meaningful public participation.

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1. Existence of a Project-Specific Noise Study Not Included in the EAW Record

A **Traffic Noise Analysis Report** for the *Owatonna East Side Corridor* was prepared by **WSB for Steele County** and dated **December 14, 2024**. This report was submitted to the State on behalf of Steele County but was **not provided to residents during the EAW process**, despite valid public data requests and an Administrative Law Judge ruling confirming that the County improperly responded to the request for noise studies.

Residents submitted public data requests seeking all noise studies, iterations, and related analyses for the Project. **Steele County responded that no such noise studies existed.** That response is inconsistent with the attached **WSB Traffic Noise Analysis Report** prepared for Steele County and submitted to the State.

The report documents extensive noise impacts, receptor modeling, and mitigation analysis using the **FHWA Traffic Noise Model (TNM) Version 2.5**, consistent with federal noise analysis requirements under **23 CFR 772**.

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2. Documented Noise Impacts to Residential Receptors

The report identifies **496 total noise receptors**, including **175 receptors in Noise Sensitive Area K (NSA K)**, which corresponds to the **North Country neighborhood**.

Appendix figures dated **March 19–20, 2024** depict widespread impacted residential receptors along the corridor, including locations where **every other home** is identified as impacted.

Appendix B, **Table B-1**, documents substantial noise impacts to **properties K1–K150**, as well as impacts to additional neighborhoods outside of North Country.

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3. Noise Levels Exceeding or Approaching Regulatory Thresholds

The study indicates **future build-condition noise levels reaching approximately 62 dBA** at impacted residential receptors, exceeding or approaching applicable **Noise Abatement Criteria (NAC)** thresholds under federal and state guidance.

Even with mitigation, multiple residences remain exposed to **50+ dBA**, with several receptors modeled to experience **noise reductions exceeding 15 dBA**, indicating severe baseline noise impacts associated with the project. The study identifies multiple residential receptors with modeled build-condition **noise increases approaching 25–30 dBA**, indicating severe baseline noise impacts.

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4. Mitigation Feasibility and Cost-Effectiveness Was Analyzed and Recommended

The report evaluates multiple mitigation scenarios, including **Wall K1**, a **2,430-foot-long, 20-foot-high noise wall**, which:

- Achieves **≥7 dBA noise reduction** at impacted receptors,
- Benefits **24 residential receptors**,
- Meets **MnDOT cost-effectiveness standards** at an estimated **$72,900 per benefited receptor**, and
- Is **explicitly recommended for further evaluation** by WSB.

Additional figures dated **December 8 and December 14, 2024** show mitigation configurations in which **all adjacent residential properties** would experience at least **7 dBA reduction**, with an extended wall alignment wrapping the subdivision.

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5. Failure to Disclose This Study Invalidates the EAW

Despite the existence of this detailed noise analysis, the EAW provided to the public does **not include**:

- Noise modeling outputs,
- Identification of impacted receptors,
- Disclosure of predicted noise levels,
- Evaluation of feasible and reasonable mitigation measures, or
- Comparison of mitigation versus **avoidance**.

The absence of this information prevents the public from evaluating whether the project complies with **23 CFR 772**, **MnDOT noise requirements**, **Minn. R. ch. 4410,** and **Minn . R. ch. 7030** standards for environmental disclosure and meaningful public participation.

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6. Procedural Implications

Because this noise study existed, was prepared for Steele County, and was relied upon by its consultant, **its exclusion from the EAW record constitutes a material omission**, not a technical oversight. The public was denied the opportunity to review, verify, and comment on noise impacts and mitigation during the EAW comment period.

This comment is submitted to ensure the administrative record accurately reflects that **required noise studies existed but were withheld from public review**, and that the EAW is therefore **incomplete and cannot support a lawful finding of no significant environmental impact**.

Attachment

- **Traffic Noise Analysis Report – Owatonna East Side Corridor** (WSB, Dec. 14, 2024) pg. 4 *(Submitted solely to document incompleteness of the EAW record and lack of public access to required noise studies.*
- **County Response to Public Data Request – Noise Studies** (Dec. 8, 2025) pg. 147

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly impacted resident

Traffic Noise Analysis Report
Owatonna East Side Corridor
State Aid Project Number 074-070-009

DRAFT

Prepared for Steele County

12/14/2024

DRAFT

HZUNITED

1.4 Project Improvements

One proposed geometric alternative was analyzed for noise impacts. The proposed geometric improvements are as follows:

- New north-south alignment from 18th ST SE at the south to 26th ST NE to the north.

2.0 Methodology and Results

2.1 Project Traffic Information and Future Forecast

Traffic data for the noise study was gathered and prepared by WSB. The traffic team developed peak hourly traffic volumes for the existing surrounding roadway system by utilizing a percentage (10-12%) of the overall AADT, as provided by MnDOT or Steele County. MN State Aid default truck percentages for urban/rural roadways were used to determine vehicle classification data. See supporting traffic study data in **Appendix X.**

2.2 Noise Level Prediction Methodology

Based on state and federal requirements, predicted traffic noise levels were modeled using the FHWA Traffic Noise Model (TNM) version 2.5. The noise model was run for the following scenarios: Existing conditions (2023), a No-Build future scenario (2044), and a Build scenario (2044). Roadway elements were delineated at the centerline of Existing and Build condition roadways for all roadway elements within the Noise study area. Terrain lines were delineated at contour break lines at low points such as ditches and high points of ridges and berms. Abatement from existing structures were modeled as barriers. Structure heights were estimated using Google Earth. Large areas of connected impervious surface were included in the model. A survey was completed along the centerline of 26th ST NE. For elevation data outside of the extents of the survey, MnTOPO lidar was used. Build condition elevation data was provided by WSB and was developed in OpenRoads Designer.

2.3 Model Validation

Noise measurements were taken on 10/11/23 at 14 representative locations along the proposed corridor as well as along the urban section on 26th Street NE to document existing noise levels and assist in validating the noise level prediction model. Monitored noise levels can also be used as a baseline of the possible ambient noise levels that can occur with a new roadway alignment. A factory calibrated noise monitoring device (Casella CEL 633C Real Time Octave Band Analyzer Type 1) was used for field monitoring. Fourteen representative field monitoring locations were chosen to represent different Noise Sensitive Areas (NSA). For five of the monitoring locations, there was no corresponding traffic volume during the monitoring duration and these were not included for model validation. Table 1 below shows the field monitoring noise level results with validation results. Field measurements were taken on Tuesday, 10/10/2023 and Wednesday 10/11/2023 (site conditions were sunny, low humidity, low winds). Traffic data was collected at the time of each monitoring session. Speed meassurements were taken on adjacent roadway. Representative noise models were developed using the field collected traffic data during the monitoring time period.

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Table 1: Traffic noise monitoring and validation table

Monitor Point ID	Monitor Start Time	Monitored	Modeled	Difference
		Leq	Leq	Leq
4	3:18 PM	47.8	45.4	-2.4
5	2:53 PM	39.4	39.9	0.5
6A	4:03 PM	47.3	49.6	2.3
8	4:33 PM	45.7	47.1	1.4
9	1:24 PM	48.4	49.4	1.0
11	1:55 PM	52.2	55.1	2.9
13	2:56 PM	55.1	56.2	1.1
14	12:45 PM	44.5	46.6	2.1
17	11:06 AM	55.4	55.5	0.1

A discrepancy less than or equal to 3.0 dBA between predicted levels and field measurements is considered acceptable for noise model validation.

Based on Table 1 above, modeled traffic noise levels ranged from -2.4 dBA to 2.9 dBA above field measurements; therefore, the prediction model was validated and used without corrections. Field monitoring locations are shown in Appendix A (Modeled monitor locations shown on **Figure X** with "MPXX"). Field measurement data sheets can be found in Appendix C.

2.4 Loudest Noise Hour

WSB Engineering is completed a traffic study for the project. This task has not required the collection of hourly vehicle counts on the surrounding roadway system. In general, higher traffic volumes, vehicle speeds and numbers of heavy trucks increases the loudness of traffic. The worst hourly traffic noise impact typically occurs when traffic is flowing more freely and when heavy truck volumes are the greatest. In lieu of collecting hourly vehicle data on numerous roadways, the following methodology is proposed. The project area does not have any congested roadways; therefore, free flow speeds are assumed at all hours. Vehicle classification data cannot be collected on a new alignment roadway; therefore, MN State Aid default truck percentages for an urban roadway were utilized in the noise model. The traffic team has developed peak hourly traffic volumes for the existing surrounding roadway system. These peak hour volumes were developed utilizing a percentage (10-12%) of the overall AADT, as provided by MnDOT or Steele County.

Because there is only a single variable: traffic volume. It was assumed that the peak hourly traffic volume will produce the WNH by default. Vehicle mixes were calculated using MnDOT State Aid vehicle mixes for rural and urban roadway segments, applied accordingly.

2.5 Noise Sensitive Areas and Noise Receptor Identification

The noise analysis includes modeled noise levels for all noise sensitive land uses within the project area likely to be affected by traffic noise from the project. Noise receptors were delineated within Noise Sensitive Areas (NSA) based on similar NAC land use, noise environment, and within locations in which noise abatement would potentially be analyzed. Overall, there were 13 NSAs

identified, and 496 total receptor locations selected, which include 282 NAC B receptors, 165 NAC C receptors, 3 NAC F receptors, and 46 NAC G receptors (Appendix B). Noise receptors were located per State and Federal standards and generally located at Areas of Frequent Human Use (AFHU).

Table 2: Noise Receptor Category Summary

Noise Sensitive Area (NSA)	Total Number of Receptors	Noise Abatement Criteria (NAC)				
		NAC B	NAC C	NAC E	NAC F	NAC G
E	28	26	0	0	0	2
F	18	13	3	0	1	1
G	15	13	1	0	1	0
H	42	39	0	0	0	3
I	51	29	5	0	0	17
J	25	1	22	0	0	2
K	175	147	25	0	0	3
L	4	0	0	0	0	4
M	8	2	3	0	0	3
N	4	0	0	0	0	4
O	3	1	0	0	0	2
P	2	0	0	0	0	2
Q	5	2	0	0	0	3
R	7	6	1	0	0	0
S	4	3	0	0	1	0
Trail	105	0	105	0	0	0
Total	**496**	**282**	**165**	**0**	**3**	**46**

A description of noise sensitive areas is included below:

- **NSA E:** NSA E is North of 26th St NE between St Paul Ave and NE 24th Ave. See Table 2 for receptor category delineation in NSA E.
- **NSA F:** See Table 2 for receptor category delineation in NSA F. NSA F includes the outdoor use space for Good Shepard Lutheran Church. Three locations were included for this parcel to evaluate noise impacts at different human use areas. NSAH is South of 26th St NE between St. Paul St. and NE 24th Ave.
- **NSA G:** NSA G is South of 26th St NE. See Table 2 for receptor category delineation in NSA G. NSA G includes the outdoor use space for Mckinley Elementary School.

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2.8 Noise Abatement Analysis

Noise abatement analysis was completed for all impacted receptors and is discussed below by NSA. Barrier analysis is discussed separately for trail receptors at the end of this section.
NSA E: There are no impacted receptors in NSA E, so no barrier analysis was performed for this location.

NSA F: There are no impacted receptors in NSA F, so no barrier analysis was performed for this location.

NSA G: There are no impacted receptors in NSA G, so no barrier analysis was performed for this location.

NSA H: There are no impacted receptors in NSA H, so no barrier analysis was performed for this location.

NSA I: Because there are 15 impacted receptors in NSA I, preliminary proposed noise walls were evaluated using TNM 2.5. See Appendix A for analyzed wall locations. The walls were designed to meet the MnDOT design goal of 7 dBA for 1 impacted receptor, and to provide 5 dBA sound level reduction for each impacted receptor. The walls were located between the roadway and the shared use trail. The wall extents were placed based on traffic sight lines[3] and stopping sight distance requirements[4] based on FHWA and MnDOT standards.

- **Wall I1:** A 1460 ft long wall (Wall I1) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I5-I8. Results are summarized below:
  - **20 ft Wall:** A 1460 ft long, 20 ft high wall (Wall I1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 9 benefited receptors. The estimated wall cost is $116,800 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 1460 ft long, 15 ft high wall (Wall I1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $112,629 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 1460 ft long, 10 ft high wall (Wall I1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 3 benefited receptors. The estimated wall cost is $175,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 1460 ft long, 8 ft high wall (Wall I1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $210,240 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **6 ft Wall:** A 1460 ft long, 6 ft high wall (Wall I1) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

[3] *MnDOT Field Design Guide Chapter 6, Exhibit 6E-16 and MnDOT Road Design Manual Chapter 5, Figure 5-2.02B*
[4] FHWA Railroad Crossing Handbook, Table C-1

- **Wall I2:** A 1120 ft long wall (Wall I2) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I5-I8. Results are summarized below:
  - **20 ft Wall:** A 1120 ft long, 20 ft high wall (Wall I2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $115,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation. 9 $89,600
  - **15 ft Wall:** A 1120 ft long, 15 ft high wall (Wall I2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 benefited receptors. The estimated wall cost is $151,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation. 7 $86,400
  - **10 ft Wall:** A 1120 ft long, 10 ft high wall (Wall I2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 3 benefited receptors. The estimated wall cost is $134,400 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 1120 ft long, 8 ft high wall (Wall I2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $161,280 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **6 ft Wall:** A 1120 ft long, 6 ft high wall (Wall I2) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

- **Wall II:** A 400 ft long wall (Wall II) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I2-. Results are summarized below:
  - **20 ft Wall:** A 400 ft long, 20 ft high wall (Wall II) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There is 1 benefited receptor. The estimated wall cost is $288,000 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 400 ft long, 15 ft high wall (Wall II) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There is 1 benefited receptor. The estimated wall cost is $216,000 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 400 ft long, 10 ft high wall (Wall II) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **8 ft Wall:** A 400 ft long, 8 ft high wall (Wall II) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **6 ft Wall:** A 400 ft long, 6 ft high wall (Wall II) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

NSA J: Because there are 15 impacted receptors in NSA J, barrier analysis was performed and is discussed in the trail abatement section.

NSA K: Because there are 55 impacted receptors in NSA K, preliminary proposed noise walls were evaluated using TNM 2.5. See Appendix A for analyzed wall locations. The walls were

designed to meet the MnDOT design goal of 7 dBA for 1 impacted receptor, and to provide 5 dBA sound level reduction for each impacted receptor. The walls were located between the roadway and the shared use trail. The wall extents were placed based on traffic sight lines[5] and stopping sight distance requirements[6] based on FHWA and MnDOT standards.

- **Wall KA:** A 340 ft long wall (Wall KA) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors K150-. Results are summarized below:
  - **20 ft Wall:** A 340 ft long, 20 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **15 ft Wall:** A 340 ft long, 15 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **10 ft Wall:** A 340 ft long, 10 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **8 ft Wall:** A 340 ft long, 8 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **6 ft Wall:** A 340 ft long, 6 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

- **Wall K1:** A 2430 ft long wall (Wall K1) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors K1-K4. Results are summarized below:
  - **20 ft Wall:** A 2430 ft long, 20 ft high wall (Wall K1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 24 benefited receptors. The estimated wall cost is $72,900 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **10 ft Wall:** A 2430 ft long, 10 ft high wall (Wall K1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 14 benefited receptors. The estimated wall cost is $62,486 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **8 ft Wall:** A 2430 ft long, 8 ft high wall (Wall K1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 9 benefited receptors. The estimated wall cost is $77,760 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 2430 ft long, 6 ft high wall (Wall K1) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

NSA L: There are no impacted existing receptors in NSA L, so no barrier analysis was performed for this location.

[5] *MnDOT Field Design Guide Chapter 6, Exhibit 6E-16 and MnDOT Road Design Manual Chapter 5, Figure 5-2.02B*

[6] FHWA Railroad Crossing Handbook, Table C-1

NSA M: Because there are 8 impacted receptors in NSA M, preliminary proposed noise walls were evaluated using TNM 2.5. See Appendix A for analyzed wall locations. The walls were designed to meet the MnDOT design goal of 7 dBA for 1 impacted receptor, and to provide 5 dBA sound level reduction for each impacted receptor. The walls were located between the roadway and the shared use trail. The wall extents were placed based on traffic sight lines[7] and stopping sight distance requirements[8] based on FHWA and MnDOT standards.

- **Wall M:** A 600 ft long wall (Wall M) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors M3-. Results are summarized below:
  - **20 ft Wall:** A 600 ft long, 20 ft high wall (Wall M) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **15 ft Wall:** A 600 ft long, 15 ft high wall (Wall M) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **10 ft Wall:** A 600 ft long, 10 ft high wall (Wall M) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **8 ft Wall:** A 600 ft long, 8 ft high wall (Wall M) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **6 ft Wall:** A 600 ft long, 6 ft high wall (Wall M) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

NSA N: There are no impacted existing receptors in NSA N, so no barrier analysis was performed for this location.

NSA O: Because there are 15 impacted receptors in NSA O, preliminary proposed noise walls were evaluated using TNM 2.5. See Appendix A for analyzed wall locations. The walls were designed to meet the MnDOT design goal of 7 dBA for 1 impacted receptor, and to provide 5 dBA sound level reduction for each impacted receptor. The walls were located between the roadway and the shared use trail. The wall extents were placed based on traffic sight lines[9] and stopping sight distance requirements[10] based on FHWA and MnDOT standards.

- **Wall O:** A 1100 ft long wall (Wall O) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors O1-. Results are summarized below:

[7] *MnDOT Field Design Guide Chapter 6, Exhibit 6E-16 and MnDOT Road Design Manual Chapter 5, Figure 5-2.02B*

[8] FHWA Railroad Crossing Handbook, Table C-1

[9] *MnDOT Field Design Guide Chapter 6, Exhibit 6E-16 and MnDOT Road Design Manual Chapter 5, Figure 5-2.02B*

[10] FHWA Railroad Crossing Handbook, Table C-1

- **20 ft Wall:** A 1100 ft long, 20 ft high wall (Wall O) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- **15 ft Wall:** A 1100 ft long, 15 ft high wall (Wall O) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- **10 ft Wall:** A 1100 ft long, 10 ft high wall (Wall O) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- **8 ft Wall:** A 1100 ft long, 8 ft high wall (Wall O) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- **6 ft Wall:** A 1100 ft long, 6 ft high wall (Wall O) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

NSA P: There are no existing impacted receptors in NSA P, so no barrier analysis was performed for this location.

NSA Q: There are no impacted receptors in NSA F, so no barrier analysis was performed for this location.

Trail: Because there are 55 impacted trail receptors, preliminary proposed noise walls were evaluated using TNM 2.5. See Appendix A for analyzed wall locations. The walls were designed to meet the MnDOT design goal of 7 dBA for 1 impacted receptor, and to provide 5 dBA sound level reduction for each impacted receptor. The walls were located between the roadway and the shared use trail. The wall extents were placed based on traffic sight lines[11] and stopping sight distance requirements[12] based on FHWA and MnDOT standards.

- **Wall TH:** A 2915 ft long wall (Wall TH) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors H1-TI5. Results are summarized below:
  - **20 ft Wall:** A 2915 ft long, 20 ft high wall (Wall TH) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 11 benefited receptors. The estimated wall cost is $190,800 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 2915 ft long, 15 ft high wall (Wall TH) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 11 benefited receptors. The estimated wall cost is $143,100 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 2915 ft long, 10 ft high wall (Wall TH) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 11 benefited receptors. The estimated wall cost is $95,400 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.

[11] *MnDOT Field Design Guide Chapter 6, Exhibit 6E-16 and MnDOT Road Design Manual Chapter 5, Figure 5-2.02B*

[12] FHWA Railroad Crossing Handbook, Table C-1

- **8 ft Wall:** A 2915 ft long, 8 ft high wall (Wall TH) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 11 benefited receptors. The estimated wall cost is $76,320 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
- **6 ft Wall:** A 2915 ft long, 6 ft high wall (Wall TH) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 11 benefited receptors. The estimated wall cost is $57,240 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.

- **Wall TJ:** A 1725 ft long wall (Wall TJ) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors JA7-JA15. Results are summarized below:
  - **20 ft Wall:** A 1725 ft long, 20 ft high wall (Wall TJ) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $177,429 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 1725 ft long, 15 ft high wall (Wall TJ) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $133,071 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 1725 ft long, 10 ft high wall (Wall TJ) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $88,714 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 1725 ft long, 8 ft high wall (Wall TJ) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $70,971 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 1725 ft long, 6 ft high wall (Wall TJ) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $53,229 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.

- **Wall TK:** A 4705 ft long wall (Wall TK) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors K1-K4. Results are summarized below:
  - **20 ft Wall:** A 4705 ft long, 20 ft high wall (Wall TK) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 56 receptors. The estimated wall cost is $60,493 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **15 ft Wall:** A 4705 ft long, 15 ft high wall (Wall TK) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 54 receptors. The estimated wall cost is $47,050 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **10 ft Wall:** A 4705 ft long, 10 ft high wall (Wall TK) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 42 receptors. The estimated wall cost is $40,329 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **8 ft Wall:** A 4705 ft long, 8 ft high wall (Wall TK) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are

41 receptors. The estimated wall cost is $33,050 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
- **6 ft Wall:** A 4705 ft long, 6 ft high wall (Wall TK) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 17 receptors. The estimated wall cost is $28,230 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.

- **Wall TL:** A 2265 ft long wall (Wall TL) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors L2-TL2. Results are summarized below:
  - **20 ft Wall:** A 2265 ft long, 20 ft high wall (Wall TL) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 9 receptors. The estimated wall cost is $181,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 2265 ft long, 15 ft high wall (Wall TL) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 9 receptors. The estimated wall cost is $135,900 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 2265 ft long, 10 ft high wall (Wall TL) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 10 receptors. The estimated wall cost is $81,540 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 2265 ft long, 8 ft high wall (Wall TL) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 8 receptors. The estimated wall cost is $81,540 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **6 ft Wall:** A 2265 ft long, 6 ft high wall (Wall TL) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- **Wall TM-1:** A 365 ft long wall (Wall TM-1) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors M2-TM1. Results are summarized below:
  - **20 ft Wall:** A 365 ft long, 20 ft high wall (Wall TM-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 receptors. The estimated wall cost is $131,400 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 365 ft long, 15 ft high wall (Wall TM-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 receptors. The estimated wall cost is $98,550 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 365 ft long, 10 ft high wall (Wall TM-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 receptors. The estimated wall cost is $65,700 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **8 ft Wall:** A 365 ft long, 8 ft high wall (Wall TM-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 receptors. The estimated wall cost is $52,560 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 365 ft long, 6 ft high wall (Wall TM-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2

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receptors. The estimated wall cost is $39,420 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.

- **Wall TM-2:** A 920 ft long wall (Wall TM-2) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors M3-TM6. Results are summarized below:
  - **20 ft Wall:** A 920 ft long, 20 ft high wall (Wall TM-2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 receptors. The estimated wall cost is $165,600 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 920 ft long, 15 ft high wall (Wall TM-2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 receptors. The estimated wall cost is $124,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 920 ft long, 10 ft high wall (Wall TM-2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 receptors. The estimated wall cost is $82,800 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 920 ft long, 8 ft high wall (Wall TM-2) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 receptors. The estimated wall cost is $66,240 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 920 ft long, 6 ft high wall (Wall TM-2) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- **Wall TN:** A 265 ft long wall (Wall TN) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors TN1-. Results are summarized below:
  - **20 ft Wall:** A 265 ft long, 20 ft high wall (Wall TN) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There is 1 benefited receptor. The estimated wall cost is $190,800 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 265 ft long, 15 ft high wall (Wall TN) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There is 1 benefited receptor. The estimated wall cost is $143,100 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 265 ft long, 10 ft high wall (Wall TN) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There is 1 benefited receptor. The estimated wall cost is $93,096 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 265 ft long, 8 ft high wall (Wall TN) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There is 1 benefited receptor. The estimated wall cost is $75,744 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 265 ft long, 6 ft high wall (Wall TN) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

- **Wall TO:** A 5545 ft long wall (Wall TO) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors O1-TP3. Results are summarized below:

  - **20 ft Wall:** A 5545 ft long, 20 ft high wall (Wall TO) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 23 receptors. The estimated wall cost is $173,583 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **15 ft Wall:** A 5545 ft long, 15 ft high wall (Wall TO) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 23 receptors. The estimated wall cost is $130,187 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **10 ft Wall:** A 5545 ft long, 10 ft high wall (Wall TO) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 22 receptors. The estimated wall cost is $90,736 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - **8 ft Wall:** A 5545 ft long, 8 ft high wall (Wall TO) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 22 receptors. The estimated wall cost is $72,589 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 5545 ft long, 6 ft high wall (Wall TO) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 22 receptors. The estimated wall cost is $54,442 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
- **Wall TKb:** A 1960 ft long wall (Wall TKb) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors K1-K4. Results are summarized below:
  - **20 ft Wall:** A 1960 ft long, 20 ft high wall (Wall TKb) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 29 benefited receptors. The estimated wall cost is $48,662 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **15 ft Wall:** A 1960 ft long, 15 ft high wall (Wall TKb) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 25 benefited receptors. The estimated wall cost is $42,336 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **10 ft Wall:** A 1960 ft long, 10 ft high wall (Wall TKb) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 17 benefited receptors. The estimated wall cost is $41,506 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **8 ft Wall:** A 1960 ft long, 8 ft high wall (Wall TKb) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 16 benefited receptors. The estimated wall cost is $35,280 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 1960 ft long, 6 ft high wall (Wall TKb) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

- Wall TI-1: A 760 ft long wall (Wall TI-1) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I31-I34. Results are summarized below:
  - 20 ft Wall: A 760 ft long, 20 ft high wall (Wall TI-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 benefited receptors. The estimated wall cost is $136,800 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.

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- 15 ft Wall: A 760 ft long, 15 ft high wall (Wall TI-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 benefited receptors. The estimated wall cost is $102,600 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
- 10 ft Wall: A 760 ft long, 10 ft high wall (Wall TI-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 benefited receptors. The estimated wall cost is $68,400 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
- 8 ft Wall: A 760 ft long, 8 ft high wall (Wall TI-1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 4 benefited receptors. The estimated wall cost is $54,720 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
- 6 ft Wall: A 760 ft long, 6 ft high wall (Wall TI-1) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

    - Wall TI-2 New: A 895 ft long wall (Wall TI-2 New) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I30A-I30D. Results are summarized below:
        - 20 ft Wall: A 895 ft long, 20 ft high wall (Wall TI-2 New) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
        - 15 ft Wall: A 895 ft long, 15 ft high wall (Wall TI-2 New) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
        - 10 ft Wall: A 895 ft long, 10 ft high wall (Wall TI-2 New) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
        - 8 ft Wall: A 895 ft long, 8 ft high wall (Wall TI-2 New) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
        - 6 ft Wall: A 895 ft long, 6 ft high wall (Wall TI-2 New) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
    - Wall TI-3: A 985 ft long wall (Wall TI-3) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I10-I13. Results are summarized below:
        - 20 ft Wall: A 985 ft long, 20 ft high wall (Wall TI-3) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $101,314 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
        - 15 ft Wall: A 985 ft long, 15 ft high wall (Wall TI-3) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 7 benefited receptors. The estimated wall cost is $75,986 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
        - 10 ft Wall: A 985 ft long, 10 ft high wall (Wall TI-3) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 6 benefited receptors. The estimated wall cost is $59,100 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.

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  - 8 ft Wall: A 985 ft long, 8 ft high wall (Wall TI-3) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 6 benefited receptors. The estimated wall cost is $47,280 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - 6 ft Wall: A 985 ft long, 6 ft high wall (Wall TI-3) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
- Wall TI-4: A 630 ft long wall (Wall TI-4) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors I5-I8. Results are summarized below:
  - 20 ft Wall: A 630 ft long, 20 ft high wall (Wall TI-4) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 3 benefited receptors. The estimated wall cost is $151,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 15 ft Wall: A 630 ft long, 15 ft high wall (Wall TI-4) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 3 benefited receptors. The estimated wall cost is $113,400 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 10 ft Wall: A 630 ft long, 10 ft high wall (Wall TI-4) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $113,400 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 8 ft Wall: A 630 ft long, 8 ft high wall (Wall TI-4) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $90,720 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 6 ft Wall: A 630 ft long, 6 ft high wall (Wall TI-4) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $68,040 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
- Wall TI-5: A 470 ft long wall (Wall TI-5) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors TI1-. Results are summarized below:
  - 20 ft Wall: A 470 ft long, 20 ft high wall (Wall TI-5) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $169,200 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 15 ft Wall: A 470 ft long, 15 ft high wall (Wall TI-5) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $126,900 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 10 ft Wall: A 470 ft long, 10 ft high wall (Wall TI-5) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $84,600 per receptor. The wall does not meet the Cost Effectiveness standard, thus this wall is not recommended for further evaluation.
  - 8 ft Wall: A 470 ft long, 8 ft high wall (Wall TI-5) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 2 benefited receptors. The estimated wall cost is $67,680 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.

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ensure the desired compatibility between the proposed East Side Corridor and potential future development.

3.0 Construction Noise

The construction activities associated with implementation of the proposed project will result in increased noise levels relative to existing conditions. These impacts will primarily be associated with construction equipment.

The following table (Table 5) shows peak noise levels monitored at 50 feet from various types of construction equipment. This equipment is primarily associated with site grading/site preparation, which is generally the roadway construction phase associated with the greatest noise levels.

Table 5: Typical construction noise [Source: EPA and FHWA]

Equipment Type	Manufacturers Sampled	Total Number of Models in Sample	Peak Noise Level (dBA)	
			Range	Average
Backhoes	5	6	74-92	83
Front Loaders	5	30	75-96	85
Dozers	8	41	65-95	85
Graders	3	15	72-92	84
Scrapers	2	27	76-98	87
Pile Drivers	N/A	N/A	95-105	101

Elevated noise levels are, to a degree, unavoidable for this type of project. Scott County and its contractor(s) are exempt from local noise ordinances, it is the practice to require contractor(s) to comply with applicable local noise restrictions and ordinances to the extent that is reasonable. Advanced notice will be provided to affected communities of any planned abnormally loud construction activities. It is anticipated that night construction may sometimes be required to minimize traffic impacts and to improve safety. However, construction will be limited to daytime hours as much as possible. If necessary, a detailed nighttime construction mitigation plan will be developed during the project final design stage.

Any associated high-impact equipment noise, such as pile driving, pavement sawing, or jack hammering, will be unavoidable with construction of the proposed project. The use of this high-impact noise equipment will be prohibited during nighttime hours.

4.0 Conclusions

Based on the analysis completed using the guidelines and procedures laid out by the MnDOT Noise Requirements, there are multiple walls that were determined to be reasonable and feasible and are being advanced for public solicitation for implementation. Walls which are determined to be reasonable/feasible, but where Steele County has the deciding vote, as determined by MnDOT noise public solicitation standards, will not be advanced for public solicitation. Two walls will be advanced for public solicitation (Wall K1, Wall TI-2).

Statement of Likelihood

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The traffic noise analysis for the proposed noise barrier described above is based upon preliminary design studies completed to date. Final mitigation decisions will be subject to final design considerations and the viewpoint of benefited residents and property owners. If it is determined during final design that conditions have substantially changed, noise abatement measures may be provided. Affected benefited receptors and local officials would be notified of plans to propose a noise abatement measure prior to the completion of the final design process, and benefited residents and property owner would be solicited based on MnDOT noise requirements. This notification would explain changes in site conditions (if any), additional site information, any design changes implemented during the final design process, and an explanation of noise barrier feasibility and reasonableness. A final decision regarding installation of the proposed abatement measure will be made upon completion of final design and the associated public involvement process for the project.

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APPENDIX A – NOISE STUDY FIGURES

N

0 0.05 0.1 Miles

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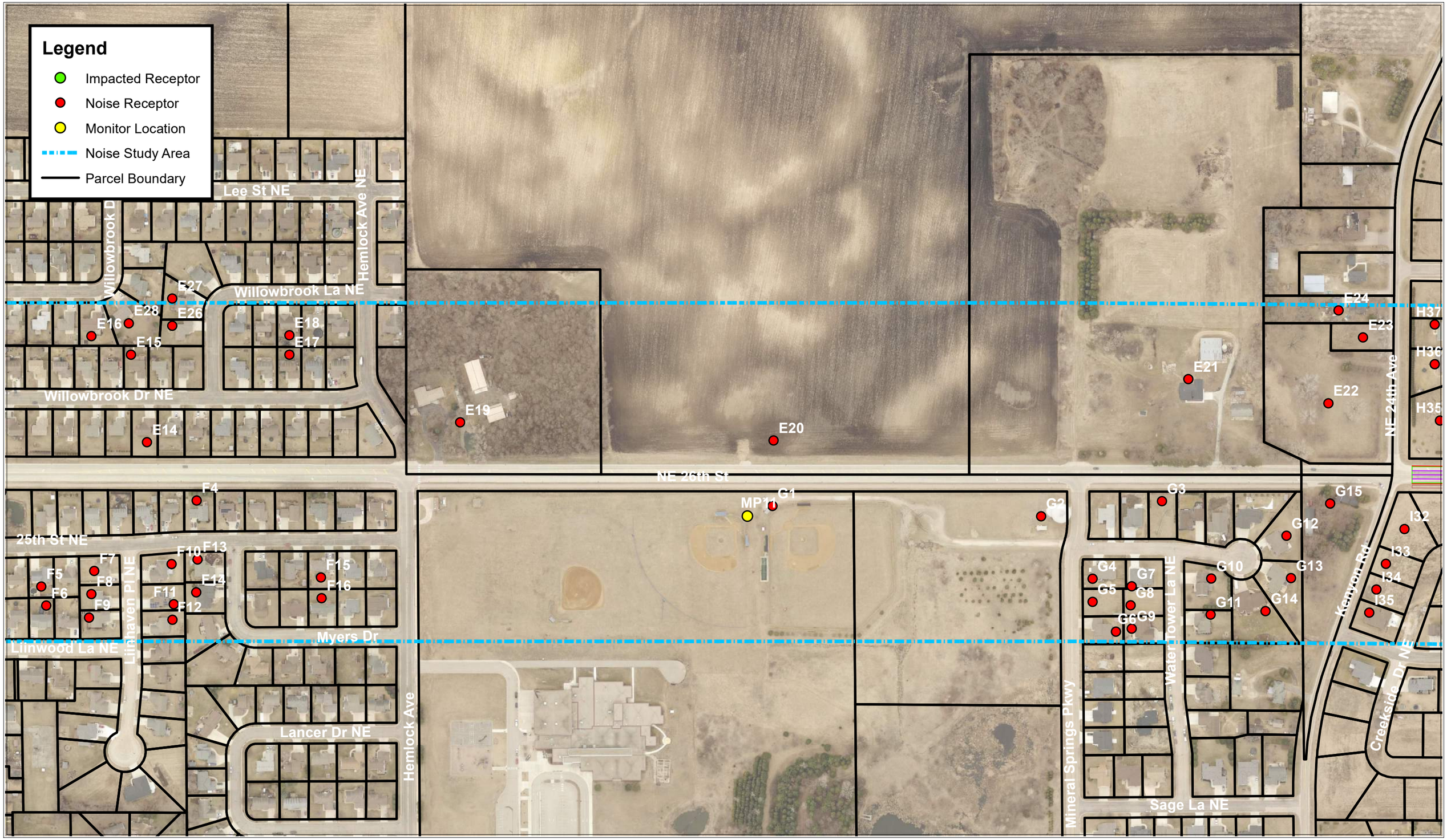
Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-1: Noise Receptors

Date: 3/19/2024



N

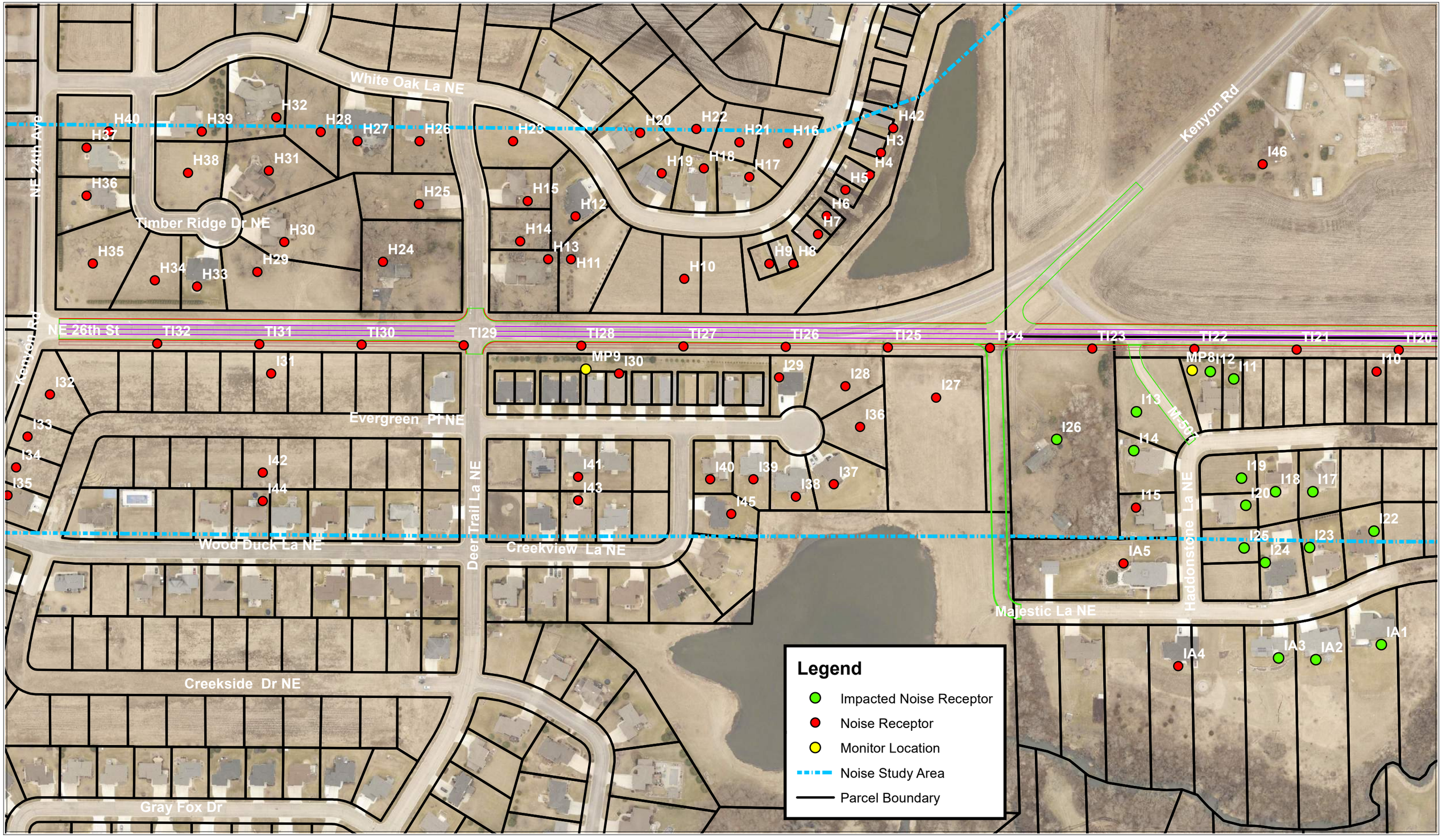
0 0.05 0.1 Miles

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-2: Noise Receptors

Date: 3/19/2024



N

0 0.05 0.1 Miles

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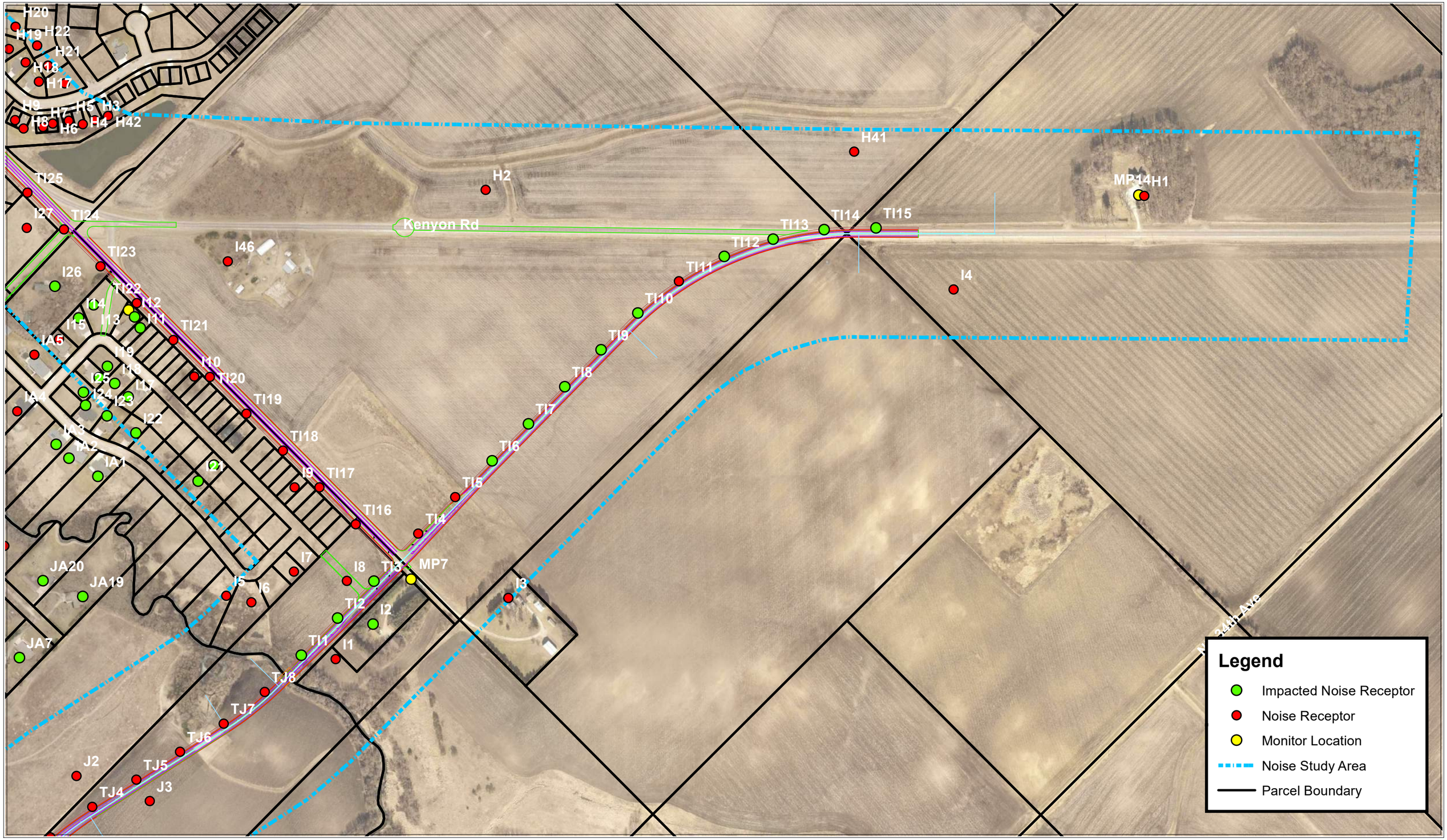
Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-3: Noise Receptors

Date: 3/20/2024



Steele Co. East Side Corridor - Noise Study Exhibit

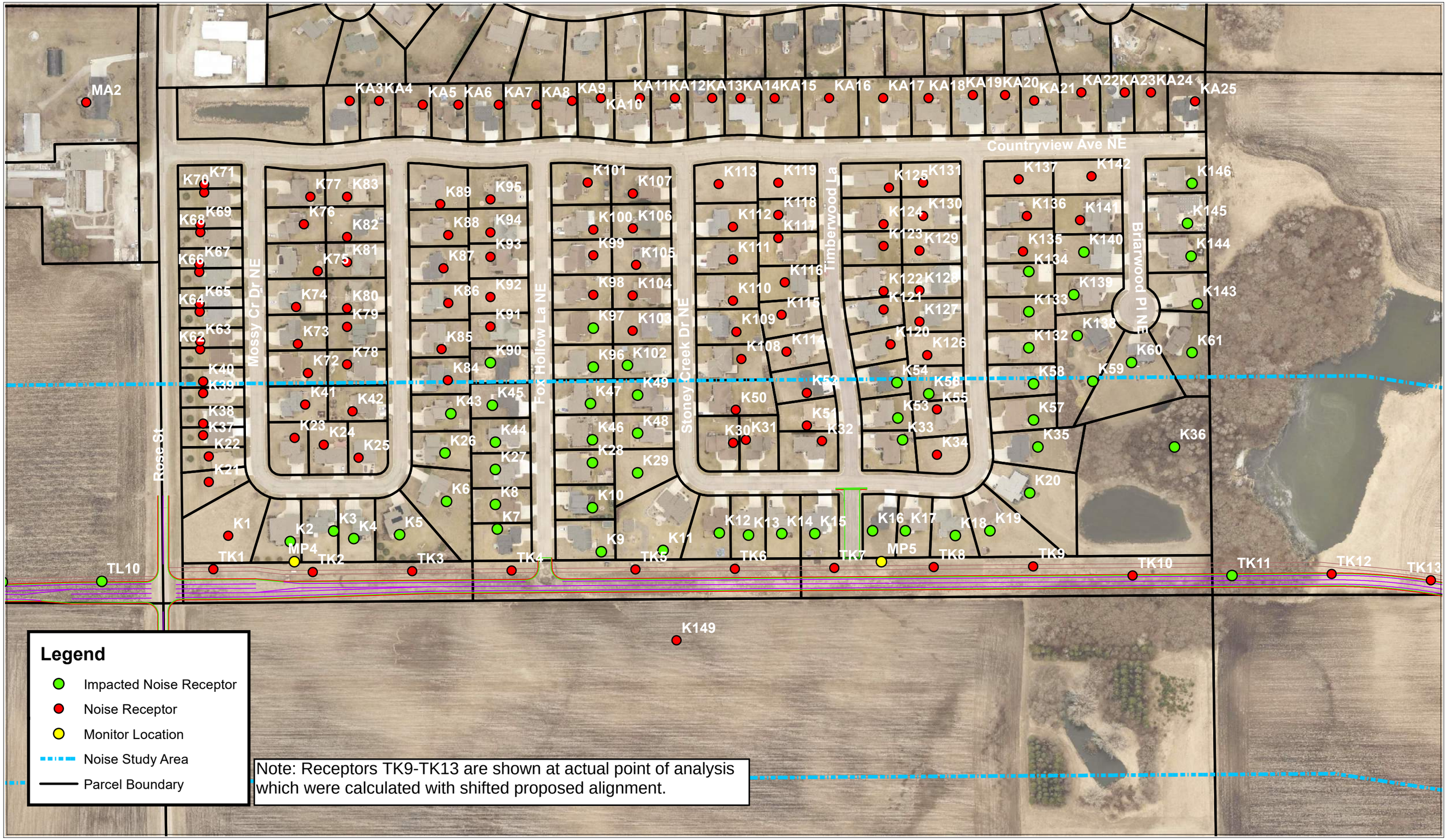
Appendix A-4: Noise Receptors

Date: 3/20/2024

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-5: Noise Receptors

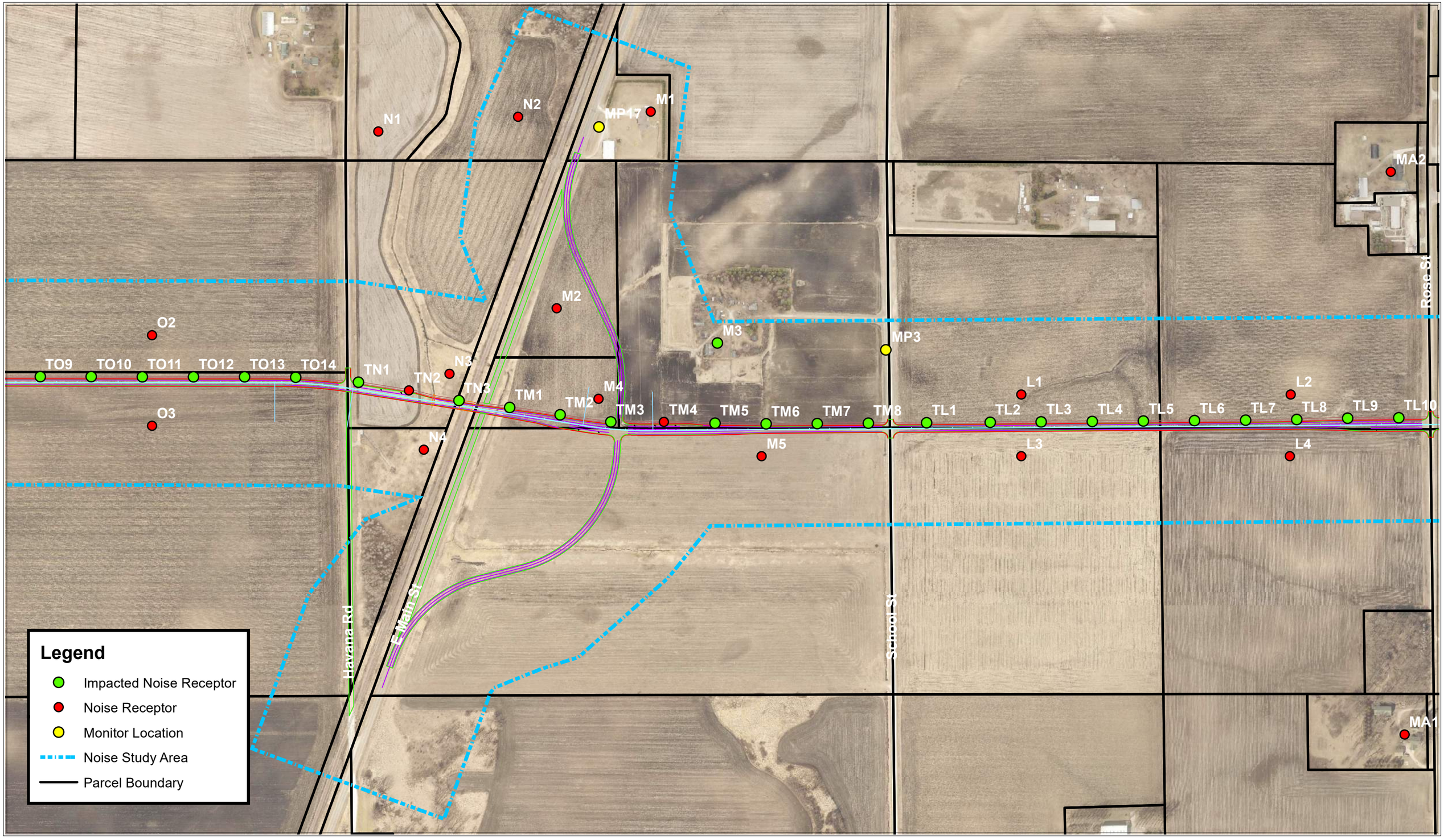
Date: 3/20/2024



Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-6: Noise Receptors

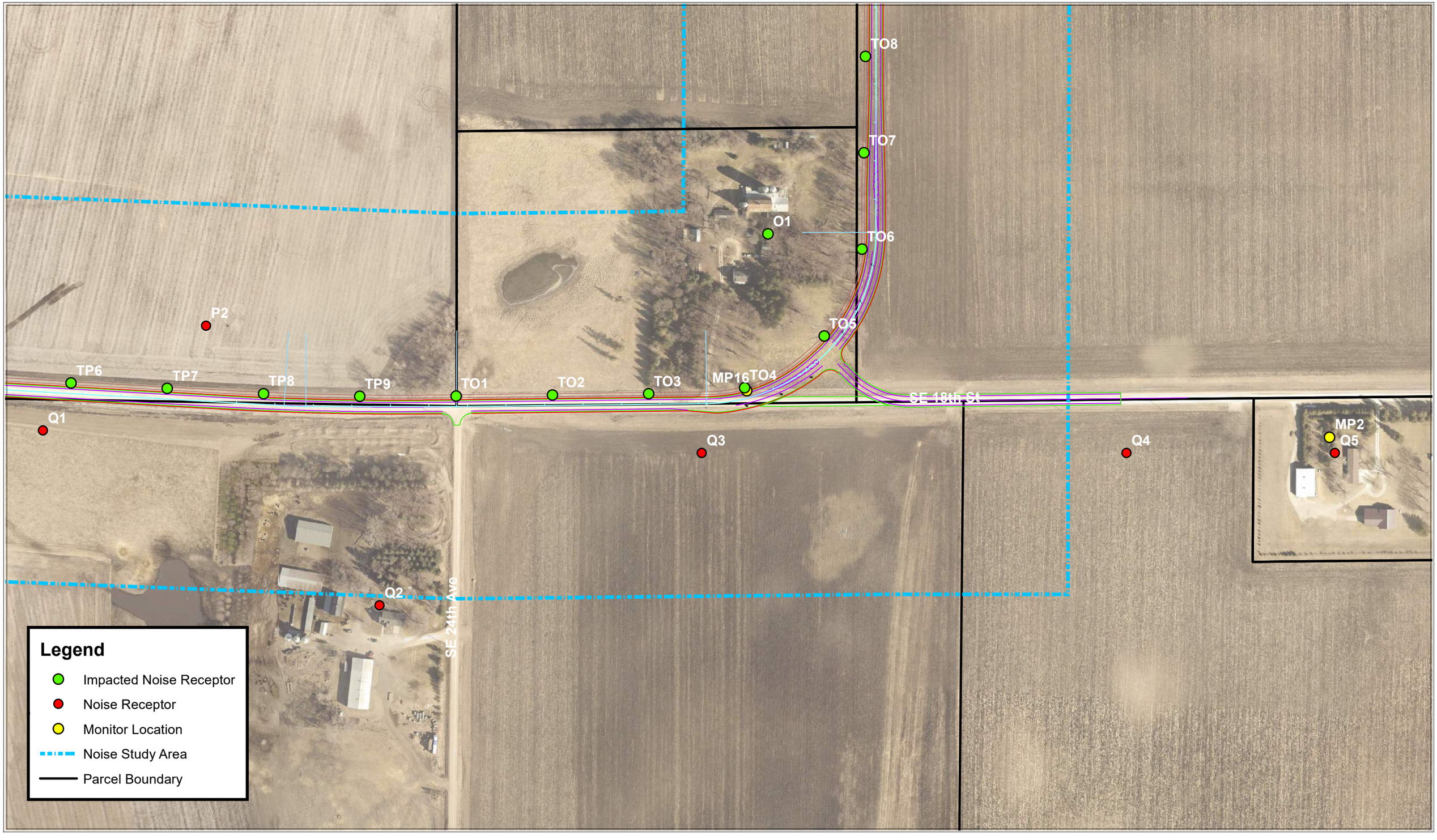
Date: 12/8/2024



Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-7: Noise Receptors

Date: 3/19/2024



N

0 0.05 0.1 Miles

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Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-8: Noise Receptors

Date: 3/19/2024

15th St SE
16th St SE
Clover La SE
Cornerstone La
Bixby Rd
Greenleaf Rd
18th St SE
SE 18th St
SE 24th Ave
CSAH 48
R6
R5
R4
R3
R2
R1
R7
MP1
S1
S2
S3
P1
P2
TP1
TP2
TP3
TP4
TP5
TP6
TP7
TP8
TP9
TO1
TO2
Q1
Q2

Legend

- Impacted Noise Receptor
- Noise Receptor
- Monitor Location
- Noise Study Area
- Parcel Boundary

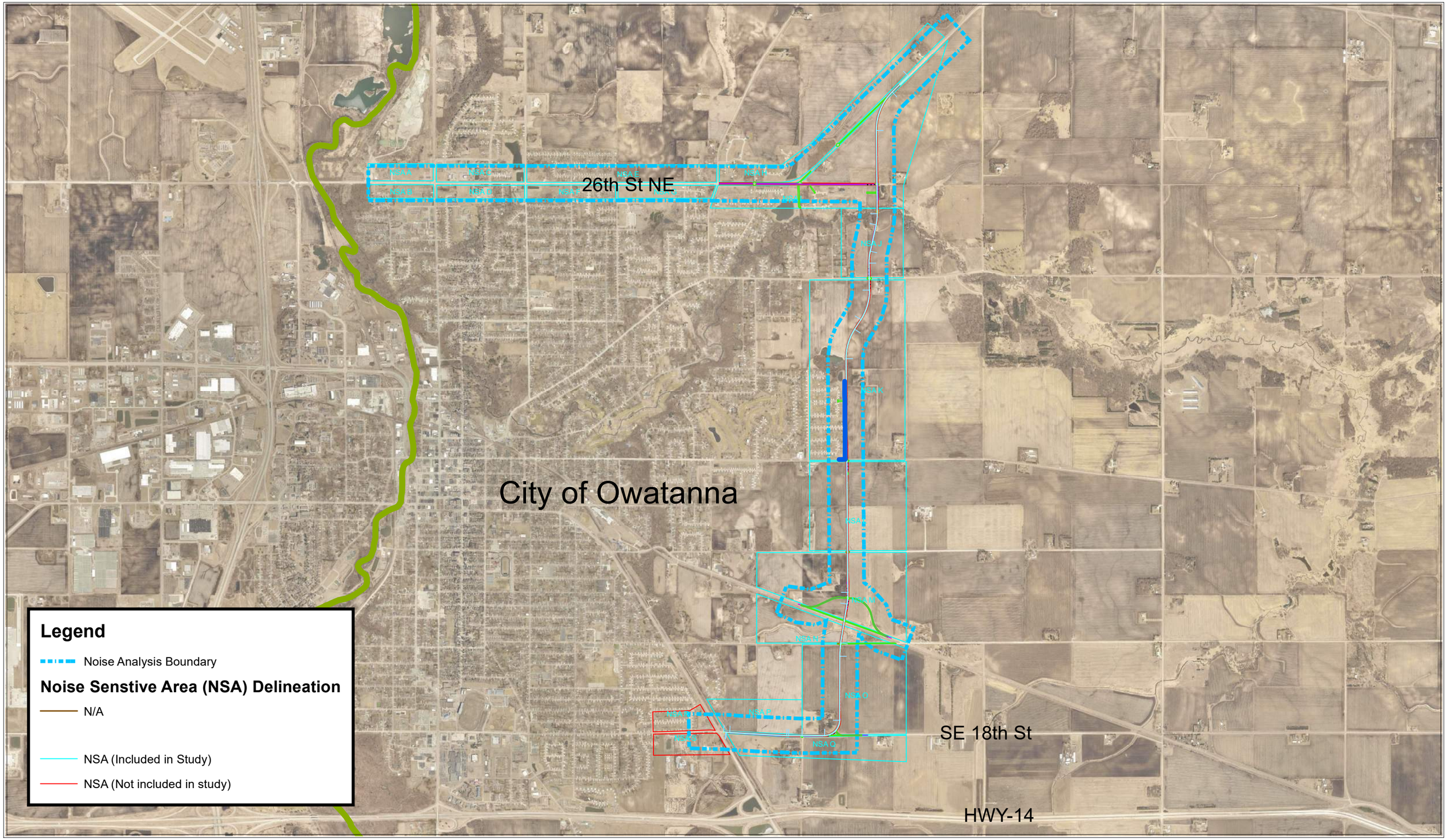
N

0 0.05 0.1 Miles

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-9: Noise Receptors

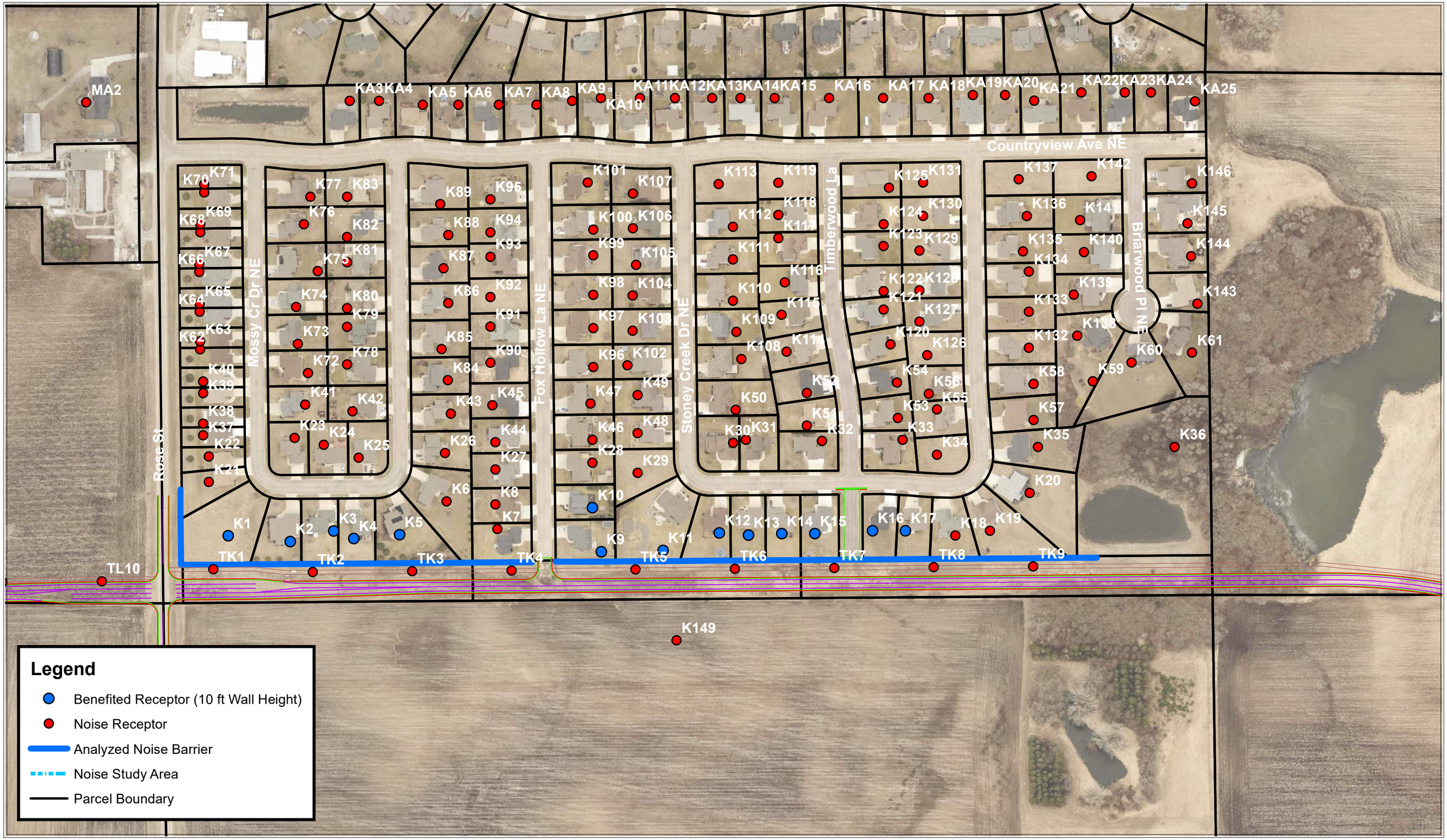
Date: 3/19/2024

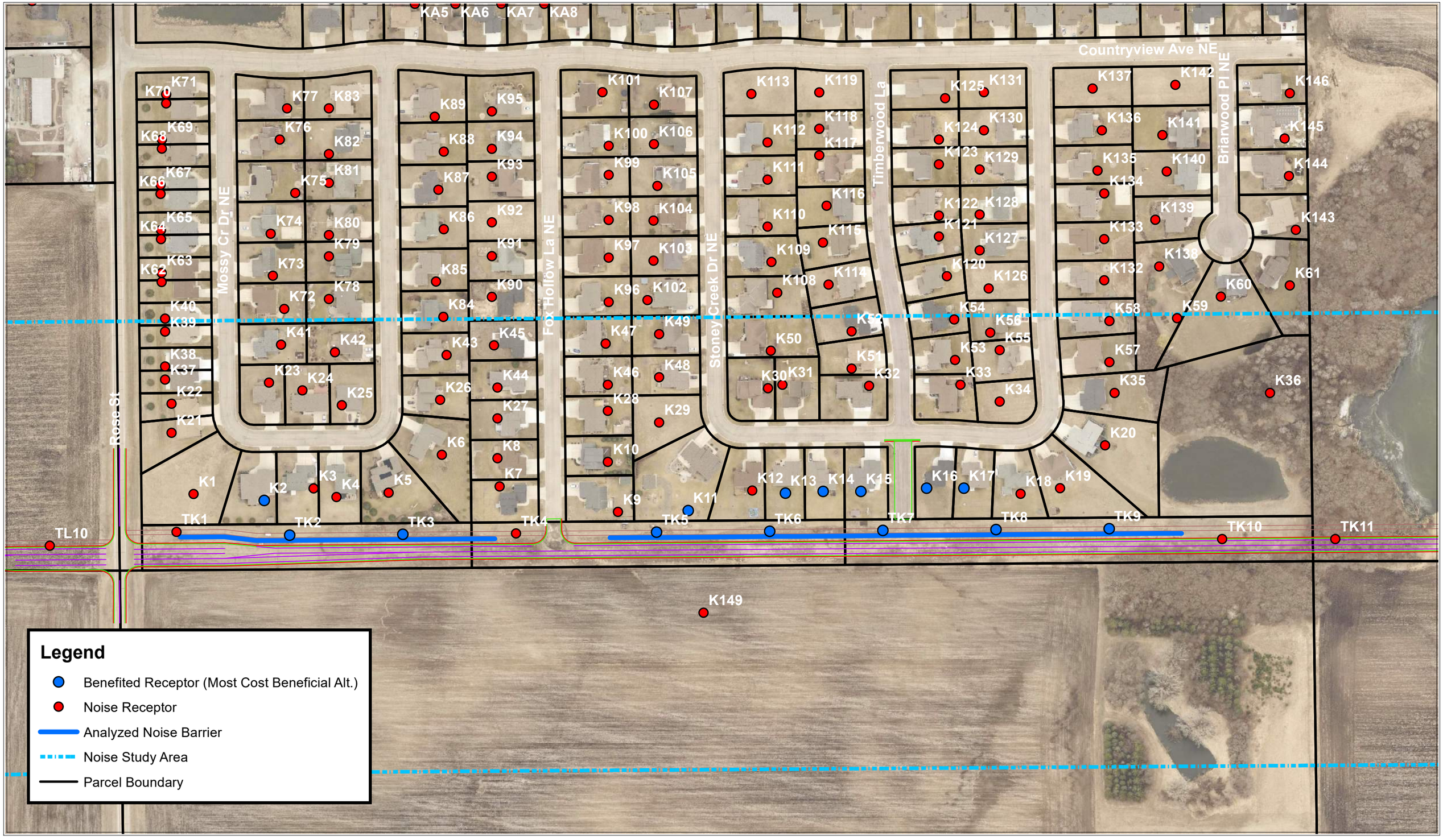


Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Study Area

Date: 11/27/2024

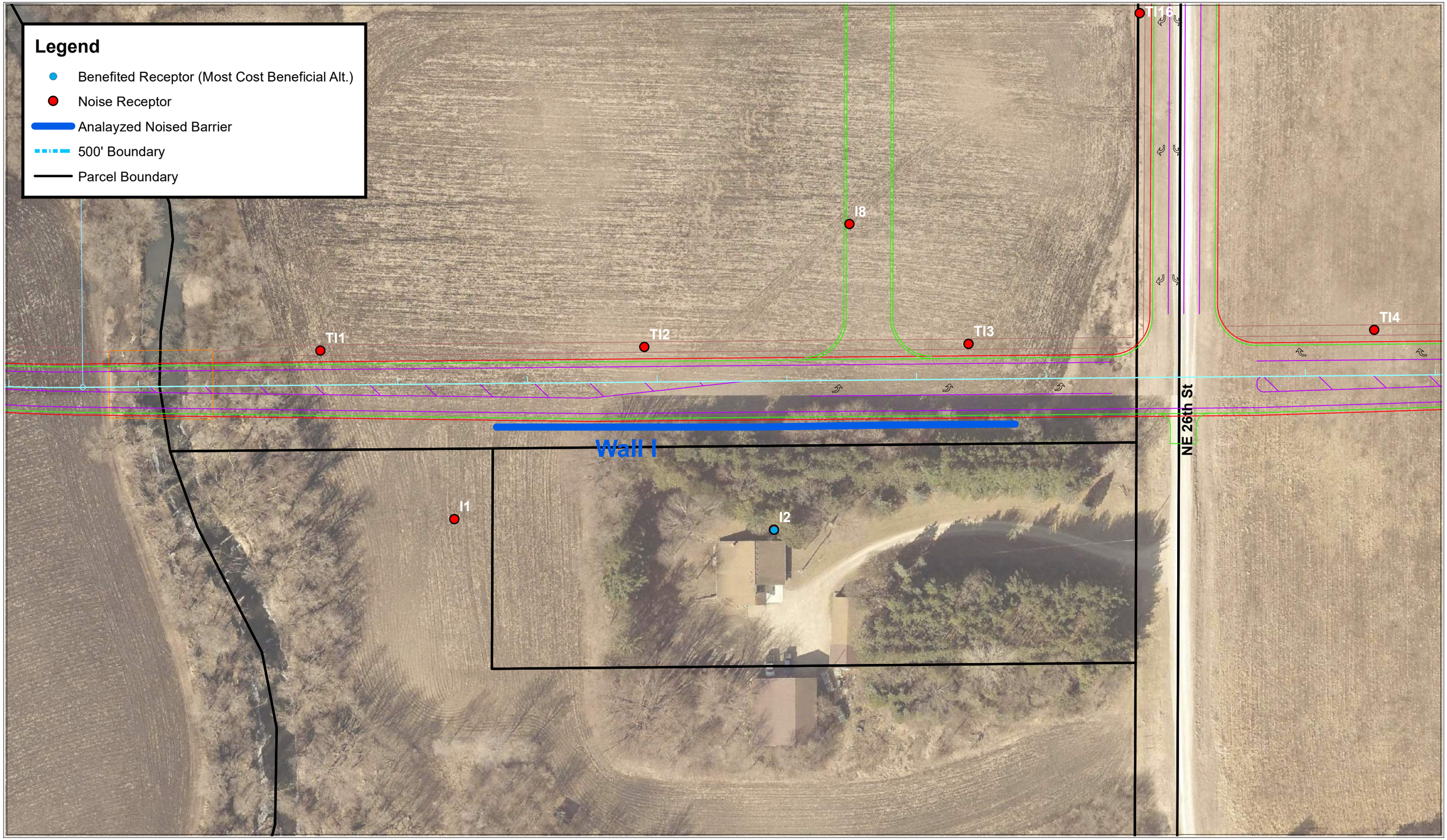

MA2
KA3 KA4 KA5 KA6 KA7 KA8 KA9 KA10 KA11 KA12 KA13 KA14 KA15 KA16 KA17 KA18 KA19 KA20 KA21 KA22 KA23 KA24 KA25
Countryview Ave NE
Mossy Cr Dr NE
Fox Hollow La NE
Stoney Creek Dr NE
Timberwood La
Briarwood Pl NE
Rose St
K70 K71 K69 K68 K67 K66 K65 K64 K63 K62 K40 K39 K38 K37 K22 K24
K77 K83 K76 K82 K75 K81 K74 K80 K79 K73 K78 K72 K41 K42 K23 K24 K25
K89 K95 K88 K94 K93 K87 K92 K86 K91 K85 K90 K84 K45 K43 K44 K26 K27 K6 K8 K7
K101 K107 K100 K106 K99 K105 K98 K104 K97 K103 K96 K102 K49 K47 K48 K46 K28 K29 K10
K113 K119 K112 K118 K111 K116 K110 K115 K109 K114 K108 K52 K50 K51 K30 K31 K32
K125 K131 K124 K130 K123 K129 K122 K128 K121 K127 K120 K126 K54 K56 K55 K53 K33 K34
K137 K142 K136 K141 K135 K140 K134 K139 K133 K138 K132 K59 K58 K57 K35 K20
K146 K145 K144 K143 K61 K60 K36
K1 K2 K3 K4 K5
K12 K13 K14 K15 K16 K17 K18 K19
K9 K11
TK1 TK2 TK3 TK4 TK5 TK6 TK7 TK8 TK9
TL10
K149
Legend
Benefited Receptor (10 ft Wall Height)
Noise Receptor
Analyzed Noise Barrier
Noise Study Area
Parcel Boundary
N
0
250
500
Feet
HZUNITED
Steele Co. East Side Corridor - Noise Study Exhibit
Appendix A-X: Noise Receptors (Wall K1)
Date: 12/14/2024



Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Barrier Analysis (Wall TK-1b)

Date: 12/8/2024



N

0 100 200 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall I)

Date: 11/27/2024

Wall I1

TI24 TI23 TI22 TI21 TI20 TI19 TI18 TI17 TI16

NE 26th St

Kenyon Rd

M-50

Haddonstone La NE

Majestic La NE

I27 I26 I13 I12 I11 I10 I9 I14 I19 I18 I17 I16 I15 I20 I21 I7 I22 I25 I23 I24 IA5 I6 I5 IA1 IA3 IA2 IA4

Legend

- Benefited Receptor (Most Cost Beneficial Alt.)
- Noise Receptor
- Analyzed Noise Barrier
- 500' Boundary
- Parcel Boundary

N

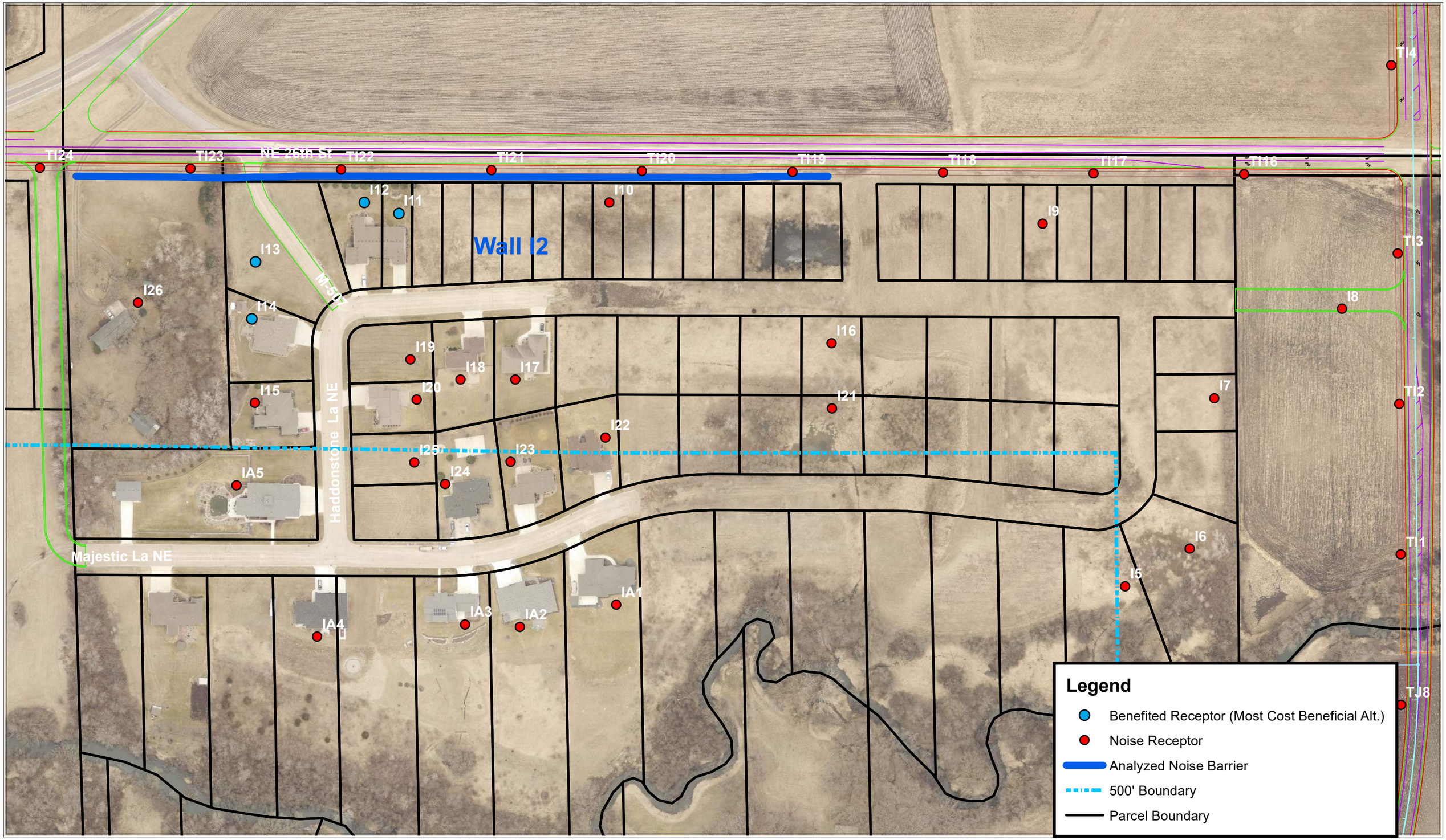
0 200 400 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall I1)

Date: 11/27/2024



N

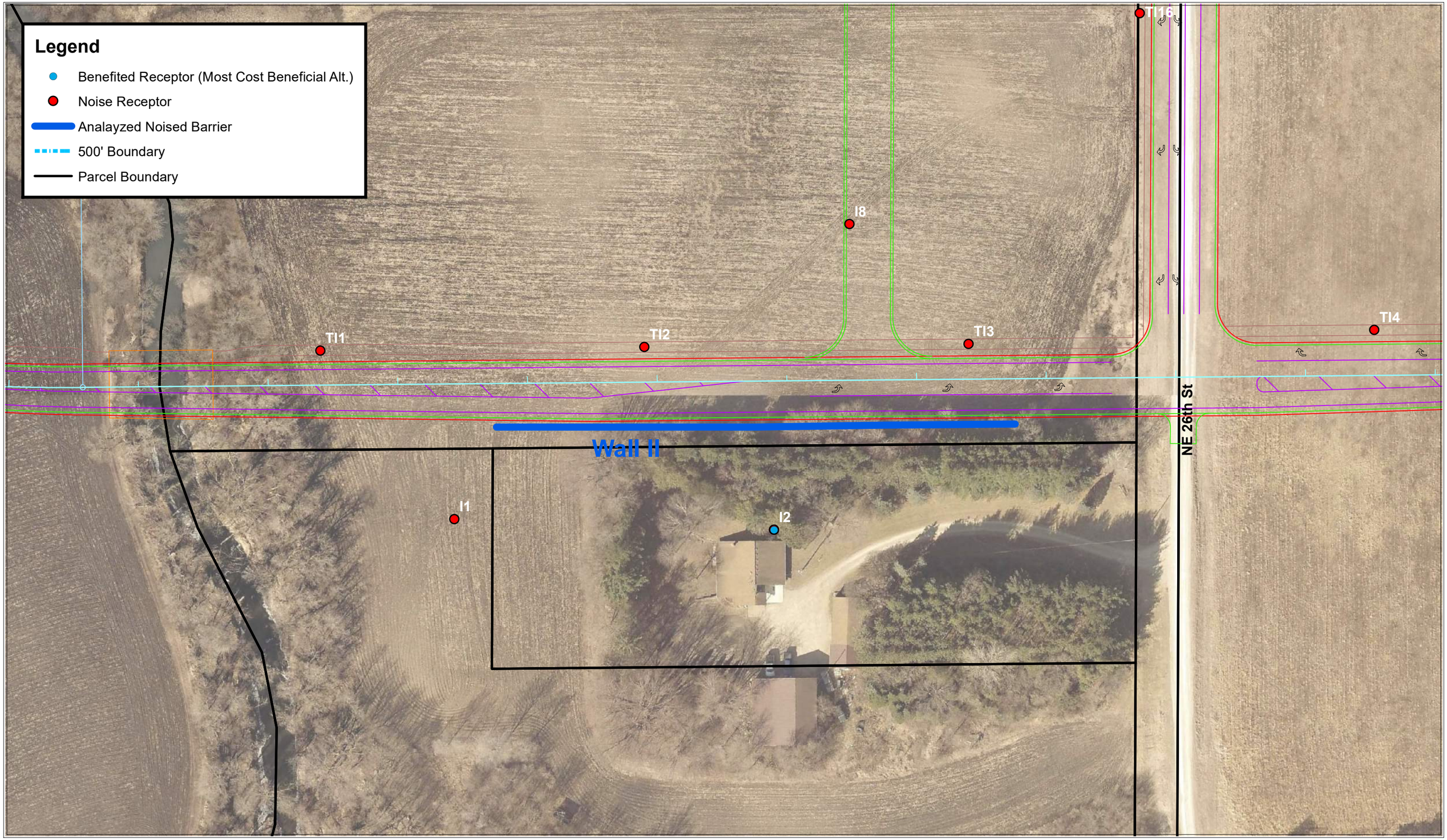
0 200 400 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall I2)

Date: 11/27/2024



N

0 100 200 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall II)

Date: 11/27/2024

Legend

- Benefited Receptor (Most Cost Beneficial Alt.)
- Noise Receptor
- Analyzed Noise Barrier
- 500' Boundary
- Parcel Boundary

Hill Dr

Walker Dr

Dunn Rd

Wall TJ

JA1 JA2 JA3 JA4 JA5JA6 JA7 JA13 JA14 JA15 JA16 JA17 JA18 JA19 JA20 JA21 JA22

J1 J2 J3

K148 K150 KA1 TK19 TK20 TK21

TJ1 TJ2 TJ3 TJ4 TJ5 TJ6 TJ7 TJ8

I1 I2 I5 I6 I7 I8 I9 I16 I21 I22

TI1 TI2 TI3 TI4 TI6 TI7 TI8 TI9

0 387.5 775 Feet

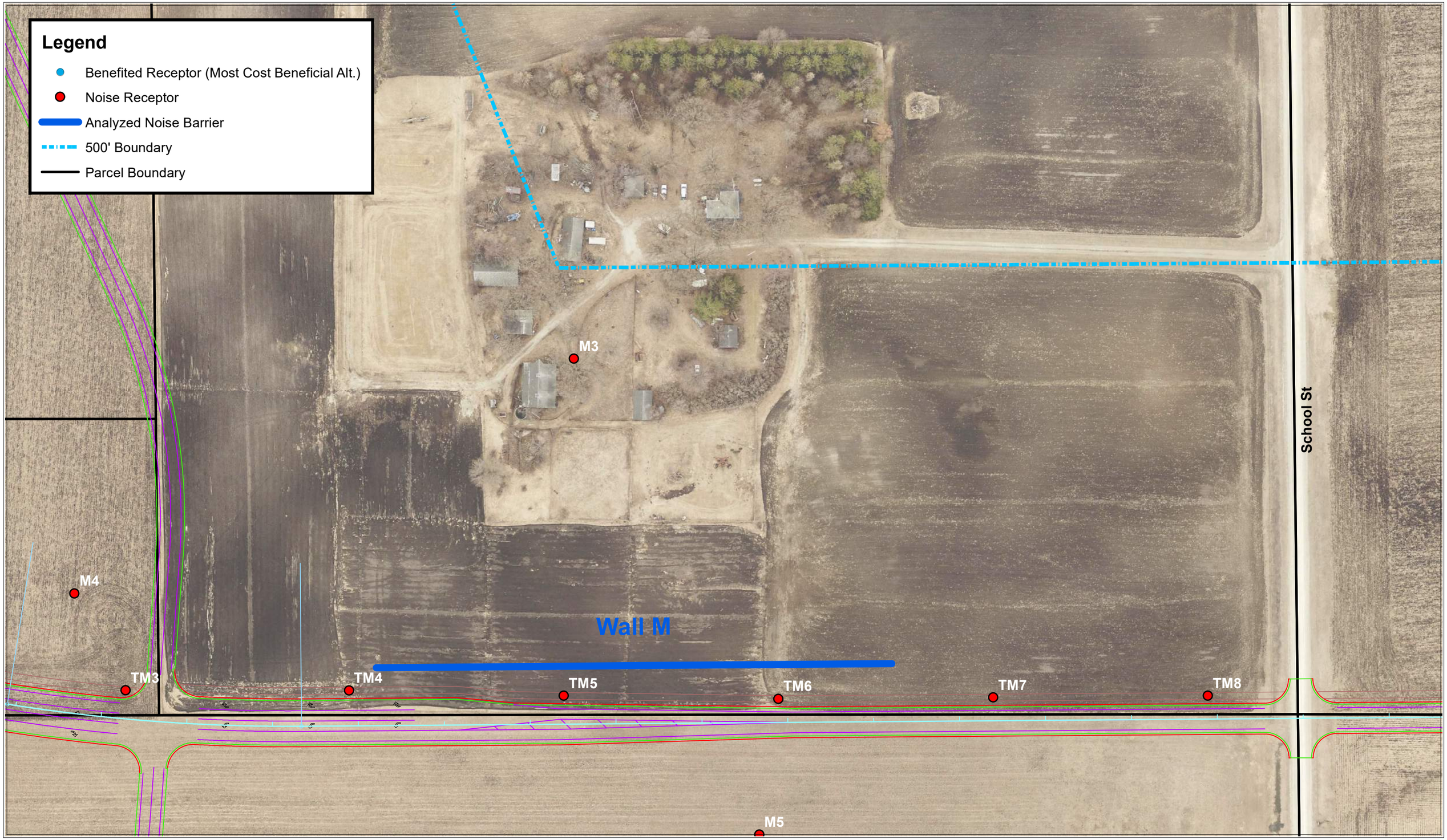
N

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TJ)

Date: 11/27/2024



N

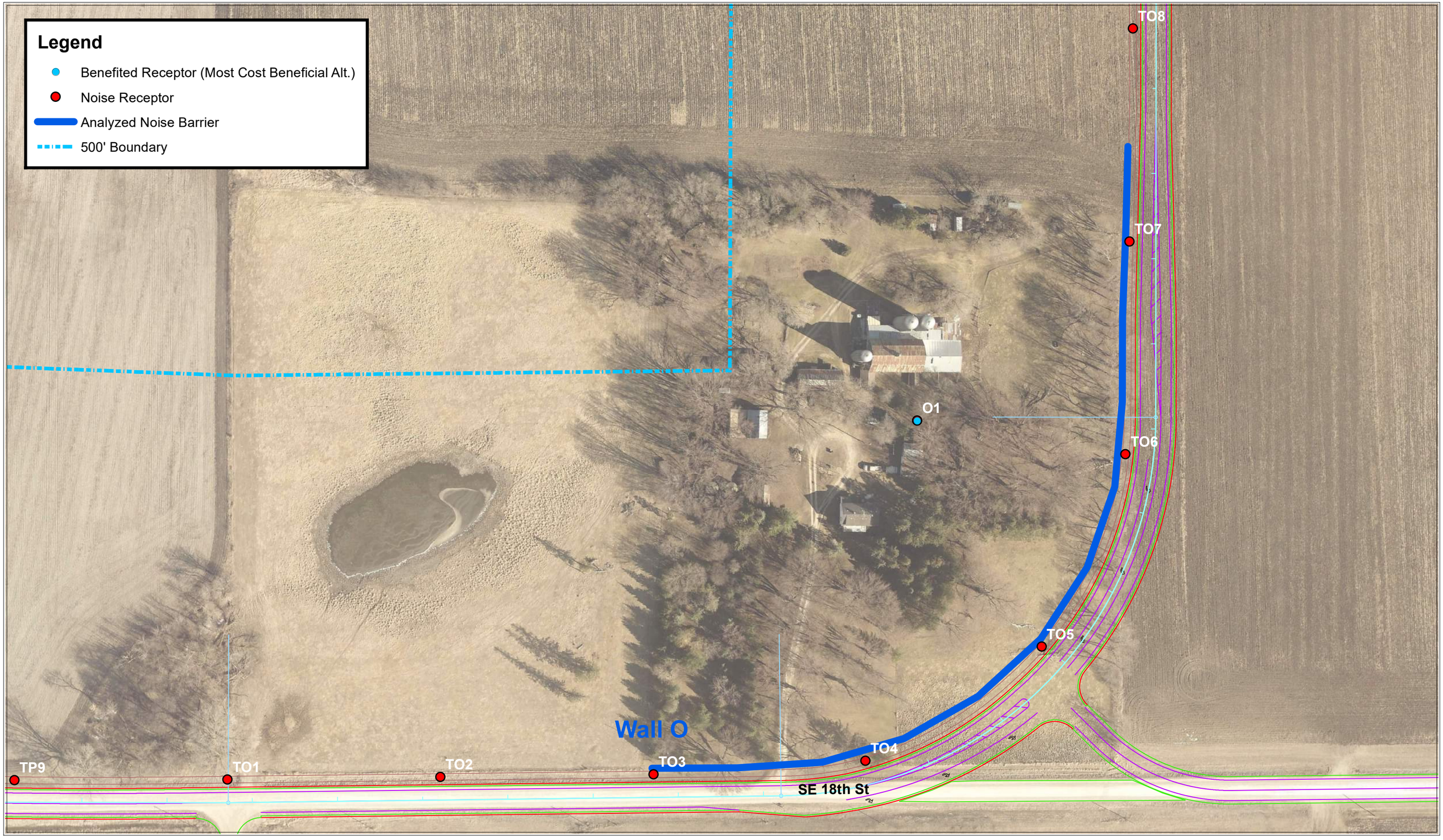
0 155 310 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall M)

Date: 11/27/2024



N

0 150 300 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall O)

Date: 11/27/2024

Legend

- Benefited Receptor (Most Cost Beneficial Alt.)
- Noise Receptor
- Analyzed Noise Barrier
- 500' Boundary
- Parcel Boundary

H35 H34 H33 H30 H29 H24

NE 26th St

TI32 TI31 TI30 TI29

Wall TI-1

G15 I32 I33 I34 I35 I31 I42 I44

Evergreen Pl NE

Kenyon Rd

Deer Trail La NE

Wood Duck La NE

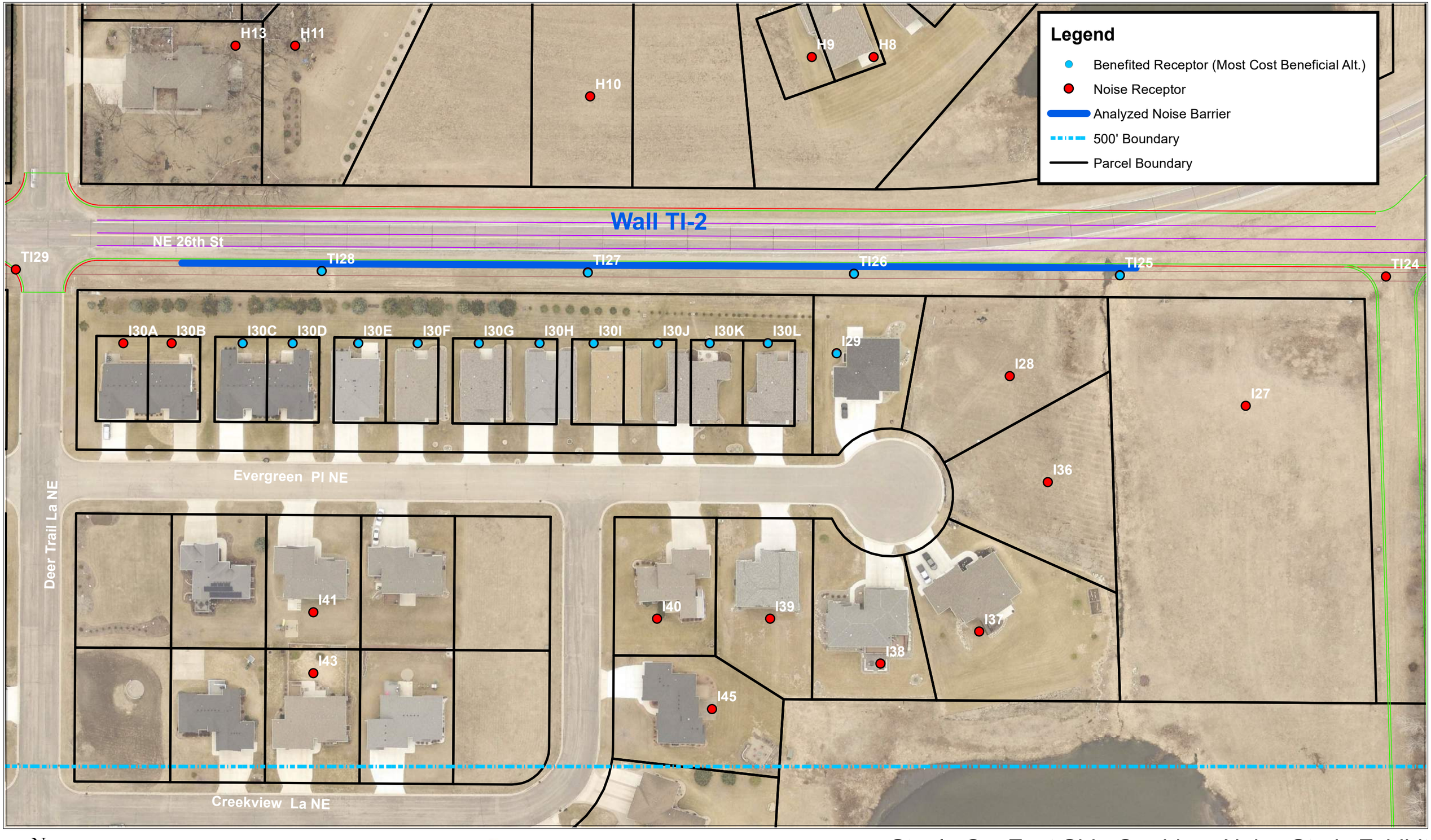
N

0 125 250 Feet

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TI-1)

Date: 11/27/2024



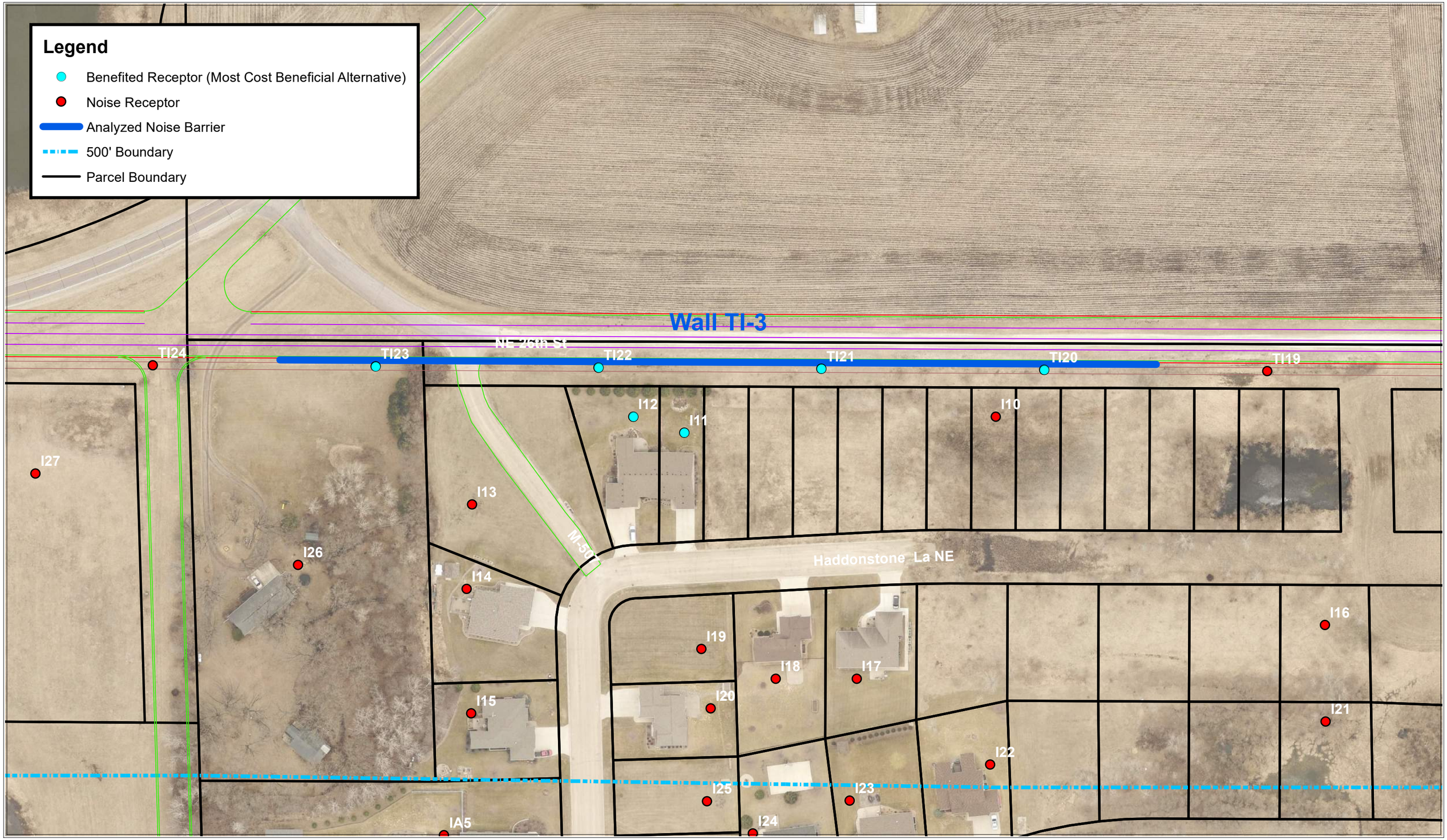
N

0 125 250 Feet

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TI-2)

Date: 11/27/2024



N

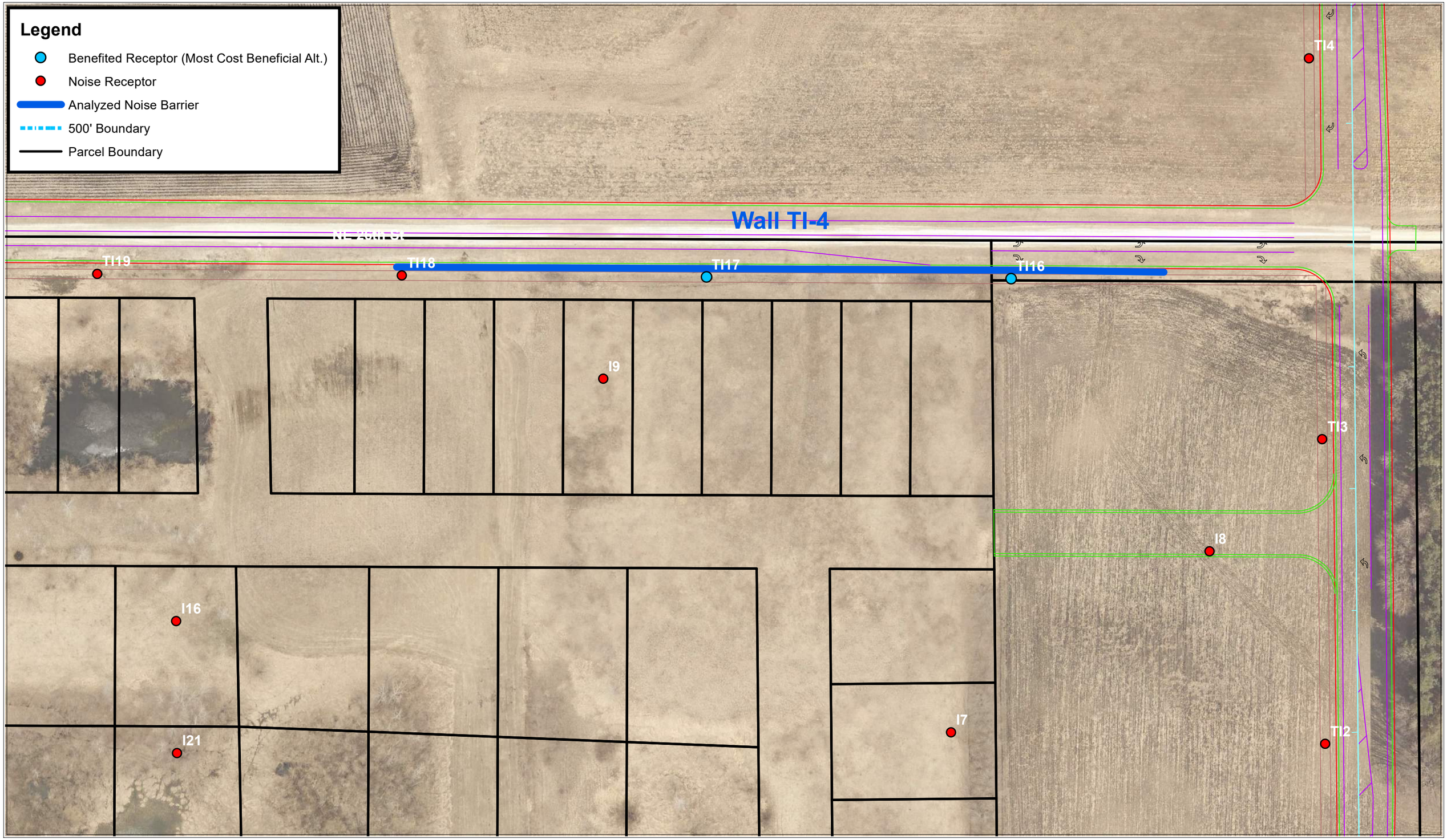
0 150 300 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TI-3)

Date: 11/27/2024



N

0 100 200 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (TI-4)

Date: 11/27/2024

Legend

- Benefited Receptor (Most Cost Beneficial Alt.)
- Noise Receptor
- Analyzed Noise Barrier
- 500' Boundary
- Parcel Boundary

I6
I7
TI16
I8
TJ8
TI1
Wall TI-5
TI2
TI3
TI4
I1
I2

N

0 100 200 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TI-5)

Date: 11/27/2024

N

0 250 500 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TL)

Date: 11/27/2024

N

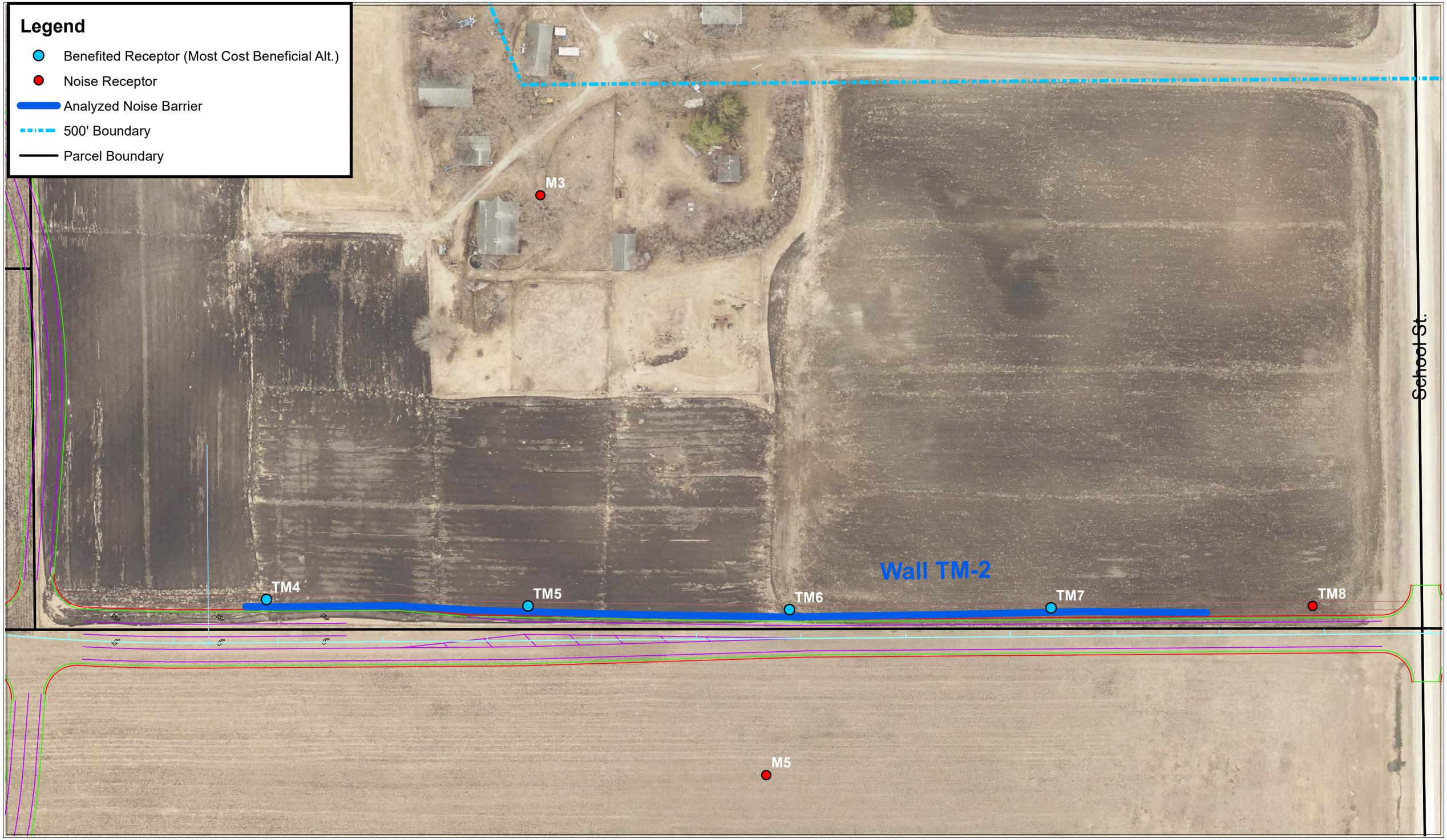
0 75 150 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TM-1)

Date: 11/27/2024



N

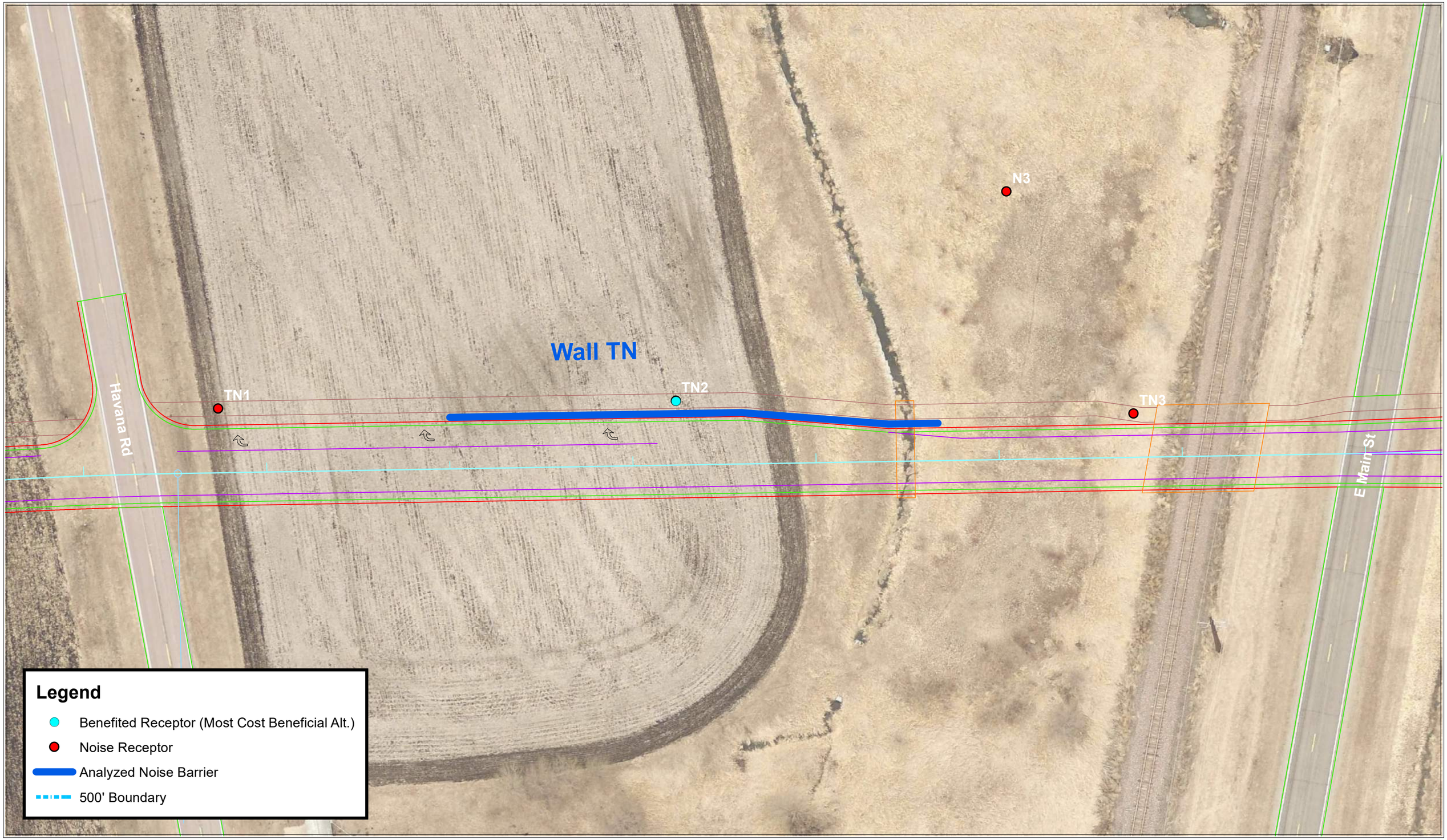
0 100 200 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TM-2)

Date: 11/27/2024



N

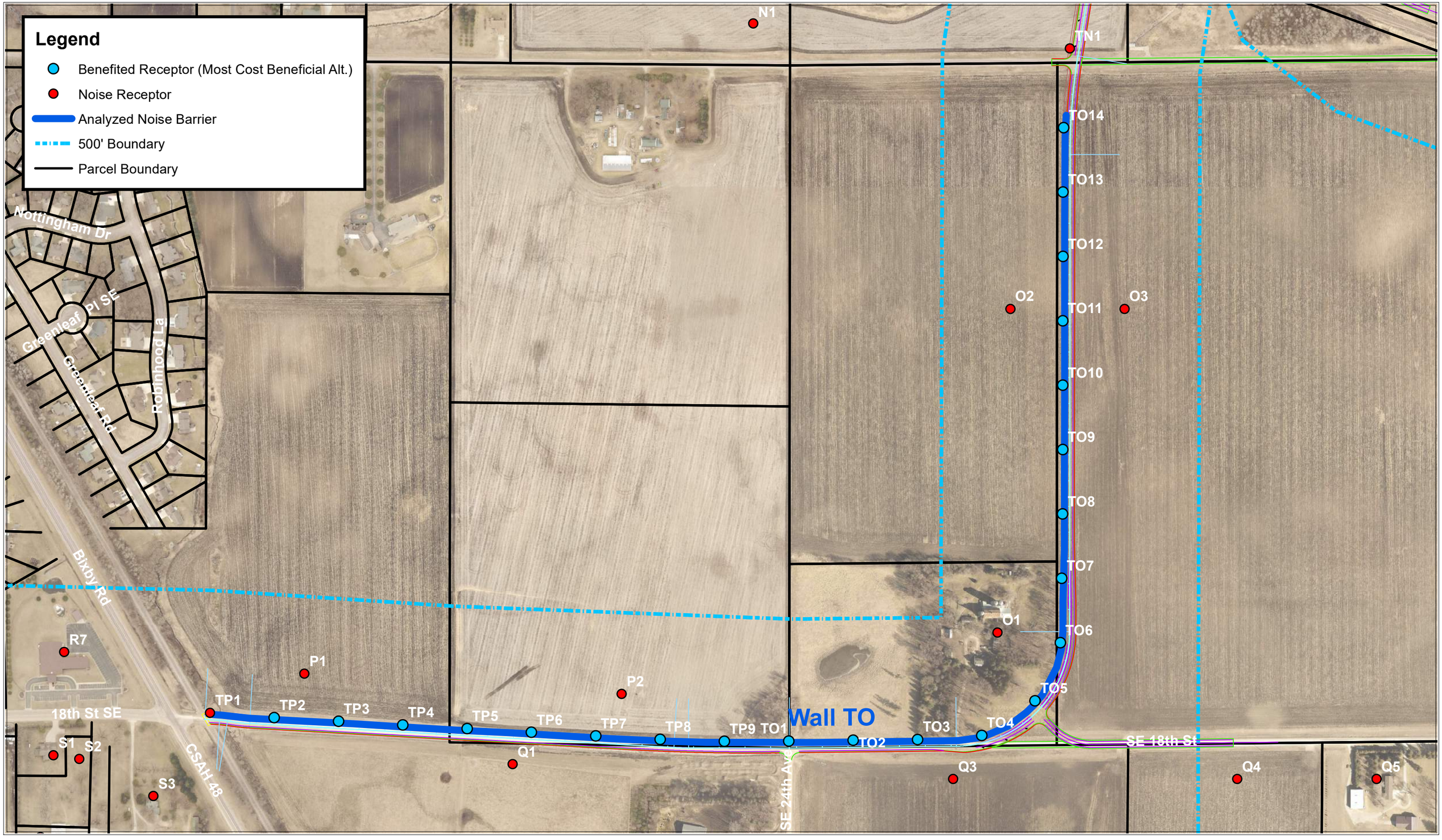
0 75 150 Feet

HZUNITED

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TN)

Date: 11/27/2024



N

0 500 1,000 Feet

Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A: Noise Barrier Analysis (Wall TO)

Date: 11/27/2024

APPENDIX B – NOISE STUDY RESULTS

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
E1	1	B	67	51.6	52.7	1.1	52.8	0.1	1.2	
E2	1	B	67	59.1	60.2	1.1	60.3	0.1	1.2	
E3	1	B	67	58.9	59.9	1.0	60.0	0.1	1.1	
E4	1	B	67	54.9	55.9	1.0	56.0	0.1	1.1	
E5	1	B	67	51.9	52.9	1.0	53.1	0.2	1.2	
E6	1	B	67	49.4	50.4	1.0	50.5	0.1	1.1	
E7	1	B	67	48.0	49.0	1.0	49.1	0.1	1.1	
E8	6	B	67	62.8	63.8	1.0	63.9	0.1	1.1	
E9	4	B	67	51.7	52.7	1.0	52.8	0.1	1.1	
E10	4	B	67	50.5	51.5	1.0	51.6	0.1	1.1	
E11	1	B	67	53.2	54.3	1.1	54.3	0.0	1.1	
E12	1	B	67	51.3	52.3	1.0	52.4	0.1	1.1	
E13	1	B	67	47.8	48.8	1.0	48.9	0.1	1.1	
E14	16	B	67	62.8	63.8	1.0	63.9	0.1	1.1	
E15	9	B	67	47.8	48.8	1.0	48.9	0.1	1.1	
E16	5	B	67	47.8	48.9	1.1	49.0	0.1	1.2	
E17	5	B	67	45.7	46.7	1.0	46.9	0.2	1.2	
E18	5	B	67	44.8	45.8	1.0	45.9	0.1	1.1	
E19	1	B	67	58.2	59.1	0.9	59.4	0.3	1.2	
E20	1	G	-	60.7	61.6	0.9	61.9	-	-	
E21	1	B	67	42.7	43.7	1.0	43.9	0.2	1.2	
E22	1	B	67	55.4	56.2	0.8	56.5	0.3	1.1	
E23	1	B	67	46.6	47.2	0.6	47.3	0.1	0.7	
E24	1	B	67	45.0	45.5	0.5	45.5	0.0	0.5	
E25	1	G	-	53.0	54.1	1.1	54.2	-	-	
E26	1	B	67	46.4	47.4	1.0	47.6	0.2	1.2	
E27	1	B	67	45.2	46.2	1.0	46.4	0.2	1.2	
E28	1	B	67	46.5	47.5	1.0	47.6	0.1	1.1	
F1	1	C	67	55.4	56.4	1.0	56.5	0.1	1.1	(3)
F2	1	C	67	55.8	56.8	1.0	56.9	0.1	1.1	
F3	1	C	67	55.7	56.7	1.0	56.8	0.1	1.1	
F4	13	B	67	62.3	63.3	1.0	63.4	0.1	1.1	
F5	4	B	67	46.3	47.3	1.0	47.4	0.1	1.1	
F6	4	B	67	45.2	46.3	1.1	46.4	0.1	1.2	
F7	1	B	67	50.2	51.2	1.0	51.3	0.1	1.1	
F8	1	B	67	47.0	48.1	1.1	48.1	0.0	1.1	
F9	1	B	67	46.1	47.1	1.0	47.2	0.1	1.1	
F10	1	B	67	51.1	52.1	1.0	52.2	0.1	1.1	
F11	1	B	67	46.6	47.6	1.0	47.7	0.1	1.1	
F12	1	B	67	47.1	48.1	1.0	48.2	0.1	1.1	
F13	1	B	67	52.6	53.6	1.0	53.7	0.1	1.1	
F14	1	B	67	49.2	50.2	1.0	50.3	0.1	1.1	
F15	5	B	67	48.8	49.7	0.9	49.9	0.2	1.1	
F16	5	B	67	49.4	50.4	1.0	50.6	0.2	1.2	
F17	1	F	-	60.1	61.1	1.0	61.2	-	-	
F18	1	G	-	63.8	64.8	1.0	64.9	-	-	
G1	1	C	67	60.0	60.9	0.9	61.2	0.3	1.2	
G2	1	F	-	58.5	59.5	1.0	59.8	-	-	
G3	6	B	67	60.8	61.7	0.9	62.0	0.3	1.2	
G4	1	B	67	47.2	48.1	0.9	48.5	0.4	1.3	
G5	1	B	67	44.9	45.8	0.9	46.1	0.3	1.2	
G6	1	B	67	38.3	39.1	0.8	39.3	0.2	1.0	
G7	1	B	67	38.7	39.5	0.8	39.8	0.3	1.1	
G8	1	B	67	40.4	41.2	0.8	41.5	0.3	1.1	
G9	1	B	67	39.1	40.0	0.9	40.3	0.3	1.2	
G10	1	B	67	43.9	44.7	0.8	45.1	0.4	1.2	
G11	1	B	67	43.1	43.9	0.8	44.0	0.1	0.9	
G12	1	B	67	54.6	55.5	0.9	55.8	0.3	1.2	
G13	1	B	67	51.0	51.7	0.7	51.7	0.0	0.7	
G14	1	B	67	48.4	49.0	0.6	49.0	0.0	0.6	
G15	1	B	67	59.5	60.4	0.9	60.7	0.3	1.2	
H1	1	B	67	52.4	53.3	0.9	56.6	3.3	4.2	
H2	1	G	-	51.0	51.9	0.9	40.1	-	-	
H3	1	B	67	45.6	46.3	0.7	45.1	-1.2	-0.5	(1)
H4	1	B	67	46.7	47.5	0.8	47.0	-0.5	0.3	
H5	1	B	67	47.1	47.8	0.7	47.9	0.1	0.8	

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
H6	1	B	67	48.6	49.4	0.8	50.2	0.8	1.6	
H7	1	B	67	50.4	51.2	0.8	52.3	1.1	1.9	
H8	1	B	67	53.7	54.6	0.9	54.5	-0.1	0.8	
H9	1	B	67	53.3	54.2	0.9	54.3	0.1	1.0	
H10	3	G	-	56.0	56.9	0.9	56.2	-	-	
H11	1	B	67	51.8	52.7	0.9	53.0	0.3	1.2	
H12	1	B	67	46.5	47.3	0.8	47.5	0.2	1.0	
H13	1	B	67	50.3	51.1	0.8	51.4	0.3	1.1	
H14	1	B	67	47.2	48.1	0.9	48.2	0.1	1.0	
H15	1	B	67	45.6	46.4	0.8	46.6	0.2	1.0	
H16	1	B	67	43.0	43.8	0.8	43.1	-0.7	0.1	
H17	1	B	67	42.2	42.9	0.7	43.5	0.6	1.3	
H18	1	B	67	42.9	43.6	0.7	42.1	-1.5	-0.8	(1)
H19	1	B	67	38.4	39.2	0.8	38.5	-0.7	0.1	
H20	1	B	67	40.2	40.9	0.7	40.4	-0.5	0.2	
H21	1	B	67	41.5	42.3	0.8	41.9	-0.4	0.4	
H22	1	B	67	40.9	41.7	0.8	40.8	-0.9	-0.1	(1)
H23	1	B	67	42.0	42.8	0.8	42.9	0.1	0.9	
H24	1	B	67	48.1	49.0	0.9	48.3	-0.7	0.2	
H25	1	B	67	46.9	47.7	0.8	48.5	0.8	1.6	
H26	1	B	67	43.0	43.8	0.8	44.2	0.4	1.2	
H27	1	B	67	43.2	44.0	0.8	44.6	0.6	1.4	
H28	1	B	67	42.9	43.7	0.8	44.1	0.4	1.2	
H29	1	B	67	56.2	57.1	0.9	55.7	-1.4	-0.5	(1)
H30	1	B	67	51.6	52.4	0.8	52.8	0.4	1.2	
H31	1	B	67	44.3	45.1	0.8	46.6	1.5	2.3	
H32	1	B	67	42.5	43.3	0.8	44.1	0.8	1.6	
H33	1	B	67	58.5	59.4	0.9	57.4	-2.0	-1.1	(1)
H34	1	B	67	57.7	58.6	0.9	56.9	-1.7	-0.8	(1)
H35	1	B	67	53.9	54.8	0.9	54.8	0.0	0.9	
H36	1	B	67	46.3	47.1	0.8	48.7	1.6	2.4	
H37	1	B	67	43.2	44.0	0.8	45.4	1.4	2.2	
H38	1	B	67	44.9	45.7	0.8	46.9	1.2	2.0	
H39	1	B	67	43.2	44.1	0.9	45.0	0.9	1.8	
H40	1	B	67	41.8	42.7	0.9	44.2	1.5	2.4	
H41	1	G	-	44.7	45.5	0.8	48.6	-	-	
H42	1	B	67	44.7	45.5	0.8	43.7	-1.8	-1.0	(1)
I1	1	G	-	33.7	34.2	0.5	55.7	-	-	
I2	1	B	67	36.7	37.0	0.3	58.9	21.9	22.2	
I3	1	B	67	43.7	43.7	0.0	47.4	3.7	3.7	
I4	1	G	-	48.2	49.1	0.9	52.1	-	-	
I5	1	G	-	33.5	34.0	0.5	47.2	-	-	
I6	1	G	-	33.7	34.2	0.5	48.9	-	-	
I7	3	G	-	36.8	37.2	0.4	50.9	-	-	
I8	1	G	-	38.7	38.9	0.2	56.2	-	-	
I9	10	G	-	45.6	45.7	0.1	56.8	-	-	
I10	14	G	-	47.7	47.8	0.1	55.4	-	-	
I11	1	B	67	46.9	47.2	0.3	54.8	7.6	7.9	
I12	1	B	67	48.3	48.5	0.2	55.7	7.2	7.4	
I13	1	B	67	45.9	46.6	0.7	54.0	7.4	8.1	
I14	1	B	67	43.5	44.2	0.7	50.1	5.9	6.6	
I15	1	B	67	40.3	41.1	0.8	43.5	2.4	3.2	
I16	9	G	-	39.3	39.7	0.4	48.9	-	-	
I17	1	B	67	39.4	39.8	0.4	47.9	8.1	8.5	
I18	1	B	67	40.1	40.6	0.5	48.1	7.5	8.0	
I19	1	G	-	40.5	41.0	0.5	49.0	-	-	
I20	1	B	67	38.9	39.4	0.5	46.2	6.8	7.3	
I21	8	G	-	37.5	38.0	0.5	46.5	-	-	
I22	1	B	67	37.9	38.4	0.5	45.3	6.9	7.4	
I23	1	B	67	38.0	38.6	0.6	44.3	5.7	6.3	
I24	1	B	67	37.7	38.4	0.7	43.3	4.9	5.6	
I25	1	G	-	36.7	37.3	0.6	43.8	-	-	
I26	1	B	67	46.0	46.9	0.9	51.5	4.6	5.5	
I27	1	G	-	52.1	52.9	0.8	55.1	-	-	
I28	1	B	67	55.2	56.1	0.9	55.4	-0.7	0.2	
I29	1	B	67	58.2	59.1	0.9	56.9	-2.2	-1.3	(1)

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
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Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
I30	10	B	67	58.7	59.6	0.9	57.2	-2.4	-1.5	(1)
I31	1	B	67	58.5	59.4	0.9	57.2	-2.2	-1.3	
I32	1	G	-	56.9	57.8	0.9	58.4	-	-	
I33	1	G	-	56.6	57.4	0.8	57.8	-	-	
I34	1	G	-	56.4	57.2	0.8	57.3	-	-	
I35	1	B	67	55.4	56.2	0.8	56.3	0.1	0.9	
I36	1	B	67	49.3	50.2	0.9	50.7	0.5	1.4	
I37	1	B	67	45.1	45.9	0.8	46.1	0.2	1.0	
I38	1	B	67	43.8	44.6	0.8	44.4	-0.2	0.6	
I39	1	B	67	43.2	44.0	0.8	44.1	0.1	0.9	
I40	1	B	67	43.8	44.6	0.8	43.9	-0.7	0.1	
I41	3	B	67	41.0	41.8	0.8	41.1	-0.7	0.1	
I42	10	G	-	46.3	47.0	0.7	45.4	-	-	(1)
I43	3	B	67	41.9	42.7	0.8	42.1	-0.6	0.2	
I44	9	B	67	44.9	45.7	0.8	44.1	-1.6	-0.8	(1)
I45	1	B	67	42.3	43.1	0.8	42.6	-0.5	0.3	
I46	1	B	67	53.4	54.2	0.8	47.0	-7.2	-6.4	(1)
J1	1	B	67	53.6	54.3	0.7	57.1	2.8	3.5	
J2	1	G	-	36.9	37.7	0.8	53.0	-	-	
J3	1	G	-	35.1	35.9	0.8	58.5	-	-	
K1	1	B	67	56.5	57.5	1.0	60.0	2.5	3.5	
K2	1	B	67	45.2	46.3	1.1	57.9	11.6	12.7	
K3	1	B	67	40.7	42.1	1.4	52.3	10.2	11.6	
K4	1	B	67	43.0	44.1	1.1	54.6	10.5	11.6	
K5	1	B	67	40.0	41.3	1.3	54.8	13.5	14.8	
K6	1	B	67	37.0	39.5	2.5	50.4	10.9	13.4	
K7	1	B	67	40.4	43.7	3.3	52.1	8.4	11.7	
K8	1	B	67	39.1	42.2	3.1	49.6	7.4	10.5	
K9	1	B	67	38.0	41.1	3.1	60.6	19.5	22.6	
K10	1	B	67	37.2	41.5	4.3	52.3	10.8	15.1	
K11	1	B	67	36.2	38.8	2.6	60.4	21.6	24.2	
K12	1	B	67	33.3	34.8	1.5	58.6	23.8	25.3	
K13	1	B	67	32.9	34.3	1.4	58.8	24.5	25.9	
K14	1	B	67	32.4	33.7	1.3	58.7	25.0	26.3	
K15	1	B	67	31.8	33.1	1.3	58.8	25.7	27.0	
K16	1	B	67	36.3	40.3	4.0	58.5	18.2	22.2	
K17	1	B	67	34.9	38.4	3.5	57.8	19.4	22.9	
K18	1	B	67	31.1	32.3	1.2	54.9	22.6	23.8	
K19	1	B	67	34.3	37.6	3.3	55.0	17.4	20.7	
K20	1	B	67	28.3	29.5	1.2	52.2	22.7	23.9	
K21	1	B	67	59.9	60.9	1.0	62.0	1.1	2.1	
K22	1	B	67	59.1	60.1	1.0	61.1	1.0	2.0	
K23	1	B	67	42.8	45.8	3.0	44.4	-1.4	1.6	
K24	1	B	67	39.2	42.0	2.8	41.2	-0.8	2.0	
K25	1	B	67	42.2	46.2	4.0	44.9	-1.3	2.7	
K26	1	B	67	38.6	42.9	4.3	44.8	1.9	6.2	
K27	1	B	67	38.6	42.2	3.6	46.9	4.7	8.3	
K28	1	B	67	38.3	42.7	4.4	48.3	5.6	10.0	
K29	1	B	67	40.0	44.5	4.5	48.7	4.2	8.7	
K30	1	B	67	33.7	38.2	4.5	35.1	-3.1	1.4	
K31	1	B	67	37.7	42.3	4.6	39.9	-2.4	2.2	
K32	1	B	67	42.6	47.5	4.9	45.2	-2.3	2.6	
K33	1	B	67	39.7	44.9	5.2	45.3	0.4	5.6	
K34	1	B	67	43.0	48.1	5.1	47.5	-0.6	4.5	
K35	1	B	67	33.5	38.3	4.8	49.6	11.3	16.1	
K36	1	B	67	30.9	33.4	2.5	49.1	15.7	18.2	
K37	1	B	67	60.4	61.4	1.0	62.4	1.0	2.0	
K38	1	B	67	60.3	61.3	1.0	62.3	1.0	2.0	
K39	1	B	67	60.1	61.2	1.1	62.1	0.9	2.0	
K40	1	B	67	60.8	61.8	1.0	62.8	1.0	2.0	
K41	1	B	67	41.6	44.1	2.5	43.9	-0.2	2.3	
K42	1	B	67	41.2	44.2	3.0	43.4	-0.8	2.2	
K43	1	B	67	38.3	42.5	4.2	43.7	1.2	5.4	
K44	1	B	67	39.5	43.2	3.7	46.5	3.3	7.0	
K45	1	B	67	38.3	42.1	3.8	44.5	2.4	6.2	
K46	1	B	67	38.2	42.5	4.3	46.9	4.4	8.7	

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
K47	1	B	67	38.3	42.6	4.3	45.6	3.0	7.3	
K48	1	B	67	38.0	42.3	4.3	45.3	3.0	7.3	
K49	1	B	67	37.9	42.1	4.2	43.7	1.6	5.8	
K50	1	B	67	38.0	42.6	4.6	40.4	-2.2	2.4	
K51	1	B	67	39.0	43.9	4.9	41.6	-2.3	2.6	
K52	1	B	67	37.9	42.6	4.7	40.7	-1.9	2.8	
K53	1	B	67	37.1	42.5	5.4	44.4	1.9	7.3	
K54	1	B	67	34.8	40.3	5.5	41.2	0.9	6.4	
K55	1	B	67	35.8	40.8	5.0	39.9	-0.9	4.1	
K56	1	B	67	35.7	40.5	4.8	41.0	0.5	5.3	
K57	1	B	67	34.7	39.4	4.7	48.0	8.6	13.3	
K58	1	B	67	35.2	39.7	4.5	45.9	6.2	10.7	
K59	1	B	67	32.1	35.6	3.5	46.4	10.8	14.3	
K60	1	B	67	31.7	34.8	3.1	46.5	11.7	14.8	
K61	1	B	67	31.8	33.7	1.9	45.9	12.2	14.1	
K62	1	B	67	61.2	62.2	1.0	63.2	1.0	2.0	
K63	1	B	67	61.2	62.2	1.0	63.2	1.0	2.0	
K64	1	B	67	61.2	62.2	1.0	63.1	0.9	1.9	
K65	1	B	67	61.1	62.1	1.0	63.1	1.0	2.0	
K66	1	B	67	61.0	62.0	1.0	63.0	1.0	2.0	
K67	1	B	67	61.0	62.0	1.0	63.0	1.0	2.0	
K68	1	B	67	59.5	60.5	1.0	61.4	0.9	1.9	
K69	1	B	67	60.0	61.0	1.0	62.0	1.0	2.0	
K70	1	B	67	57.7	58.7	1.0	59.5	0.8	1.8	
K71	1	B	67	58.6	59.6	1.0	60.3	0.7	1.7	
K72	1	B	67	41.0	43.5	2.5	43.3	-0.2	2.3	
K73	1	B	67	40.9	43.6	2.7	43.0	-0.6	2.1	
K74	1	B	67	41.5	44.0	2.5	43.1	-0.9	1.6	
K75	1	B	67	42.9	44.8	1.9	44.1	-0.7	1.2	
K76	1	B	67	46.3	47.8	1.5	46.0	-1.8	-0.3	(2)
K77	1	B	67	50.2	51.4	1.2	49.1	-2.3	-1.1	(2)
K78	1	B	67	41.2	43.8	2.6	43.2	-0.6	2.0	
K79	1	B	67	42.0	44.4	2.4	43.9	-0.5	1.9	
K80	1	B	67	42.4	44.7	2.3	44.1	-0.6	1.7	
K81	1	B	67	44.0	45.9	1.9	45.0	-0.9	1.0	
K82	1	B	67	45.4	47.1	1.7	45.8	-1.3	0.4	
K83	1	B	67	50.4	51.6	1.2	49.4	-2.2	-1.0	(2)
K84	1	B	67	38.3	42.4	4.1	42.5	0.1	4.2	
K85	1	B	67	39.4	43.3	3.9	42.8	-0.5	3.4	
K86	1	B	67	40.0	43.4	3.4	42.8	-0.6	2.8	
K87	1	B	67	41.3	44.2	2.9	43.0	-1.2	1.7	
K88	1	B	67	43.8	45.8	2.0	44.1	-1.7	0.3	
K89	1	B	67	47.7	49.1	1.4	46.5	-2.6	-1.2	(2)
K90	1	B	67	38.4	42.0	3.6	43.7	1.7	5.3	
K91	1	B	67	40.2	43.6	3.4	44.7	1.1	4.5	
K92	1	B	67	41.9	45.5	3.6	46.7	1.2	4.8	
K93	1	B	67	42.3	44.7	2.4	45.0	0.3	2.7	
K94	1	B	67	44.3	46.1	1.8	45.4	-0.7	1.1	
K95	1	B	67	48.9	50.1	1.2	47.9	-2.2	-1.0	(2)
K96	1	B	67	38.2	42.3	4.1	44.9	2.6	6.7	
K97	1	B	67	38.7	42.5	3.8	44.4	1.9	5.7	
K98	1	B	67	39.4	42.8	3.4	44.1	1.3	4.7	
K99	1	B	67	41.0	43.7	2.7	44.3	0.6	3.3	
K100	1	B	67	43.5	45.3	1.8	45.5	0.2	2.0	
K101	1	B	67	50.4	51.3	0.9	50.7	-0.6	0.3	
K102	1	B	67	37.7	41.6	3.9	43.3	1.7	5.6	
K103	1	B	67	38.6	42.3	3.7	43.0	0.7	4.4	
K104	1	B	67	39.1	42.5	3.4	42.7	0.2	3.6	
K105	1	B	67	40.7	43.7	3.0	43.2	-0.5	2.5	
K106	1	B	67	43.6	45.4	1.8	44.8	-0.6	1.2	
K107	1	B	67	48.7	49.7	1.0	49.0	-0.7	0.3	
K108	1	B	67	37.0	41.1	4.1	40.0	-1.1	3.0	
K109	1	B	67	37.4	41.6	4.2	40.0	-1.6	2.6	
K110	1	B	67	37.9	41.9	4.0	39.7	-2.2	1.8	
K111	1	B	67	39.3	42.6	3.3	40.6	-2.0	1.3	
K112	1	B	67	42.3	44.5	2.2	42.9	-1.6	0.6	

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
K113	1	B	67	49.1	50.7	1.6	49.3	-1.4	0.2	
K114	1	B	67	36.9	41.4	4.5	39.8	-1.6	2.9	
K115	1	B	67	37.7	41.8	4.1	40.1	-1.7	2.4	
K116	1	B	67	38.8	42.5	3.7	40.6	-1.9	1.8	
K117	1	B	67	41.2	43.8	2.6	42.4	-1.4	1.2	
K118	1	B	67	44.4	46.2	1.8	44.8	-1.4	0.4	
K119	1	B	67	48.7	50.2	1.5	48.8	-1.4	0.1	
K120	1	B	67	37.5	42.3	4.8	41.1	-1.2	3.6	
K121	1	B	67	37.8	42.3	4.5	41.4	-0.9	3.6	
K122	1	B	67	38.2	42.5	4.3	41.5	-1.0	3.3	
K123	1	B	67	39.4	42.8	3.4	41.5	-1.3	2.1	
K124	1	B	67	41.2	43.7	2.5	42.5	-1.2	1.3	
K125	1	B	67	46.0	47.3	1.3	46.4	-0.9	0.4	
K126	1	B	67	38.9	43.9	5.0	41.6	-2.3	2.7	
K127	1	B	67	37.4	42.2	4.8	41.9	-0.3	4.5	
K128	1	B	67	37.3	41.6	4.3	40.4	-1.2	3.1	
K129	1	B	67	39.0	42.4	3.4	41.1	-1.3	2.1	
K130	1	B	67	42.4	44.6	2.2	43.3	-1.3	0.9	
K131	1	B	67	47.2	48.6	1.4	47.5	-1.1	0.3	
K132	1	B	67	35.6	40.1	4.5	44.3	4.2	8.7	
K133	1	B	67	35.5	40.0	4.5	43.1	3.1	7.6	
K134	1	B	67	34.8	39.2	4.4	41.4	2.2	6.6	
K135	1	B	67	37.1	41.0	3.9	41.8	0.8	4.7	
K136	1	B	67	38.9	41.7	2.8	41.9	0.2	3.0	
K137	1	B	67	44.2	46.6	2.4	45.2	-1.4	1.0	
K138	1	B	67	32.7	36.4	3.7	44.2	7.8	11.5	
K139	1	B	67	33.5	37.0	3.5	42.0	5.0	8.5	
K140	1	B	67	36.1	38.4	2.3	41.2	2.8	5.1	
K141	1	B	67	38.2	40.0	1.8	41.5	1.5	3.3	
K142	1	B	67	42.5	43.8	1.3	43.8	0.0	1.3	
K143	1	B	67	31.7	33.0	1.3	43.0	10.0	11.3	
K144	1	B	67	32.7	33.7	1.0	40.3	6.6	7.6	
K145	1	B	67	33.3	34.3	1.0	39.7	5.4	6.4	
K146	1	B	67	33.6	34.6	1.0	39.3	4.7	5.7	
K147	1	G	-	30.8	32.0	1.2	49.3	-	-	
K148	1	G	-	55.4	56.2	0.8	55.3	-	-	
K149	1	G	-	35.5	37.2	1.7	58.0	-	-	
K150	1	B	67	54.1	54.9	0.8	57.3	2.4	3.2	
L1	1	G	-	36.6	36.7	0.1	57.7	-	-	
L2	1	G	-	43.0	43.0	0.0	58.9	-	-	
L3	1	G	-	36.6	36.8	0.2	59.2	-	-	
L4	1	G	-	42.6	42.6	0.0	58.7	-	-	
M1	1	B	67	42.2	42.2	0.0	43.9	1.7	1.7	
M2	1	G	-	55.7	55.7	0.0	54.4	-	-	
M3	1	B	67	39.9	40.0	0.1	50.1	10.1	10.2	
M4	1	G	-	45.4	45.5	0.1	62.0	-	-	
M5	1	G	-	38.2	38.3	0.1	59.6	-	-	
N1	1	G	-	48.3	48.4	0.1	53.1	-	-	
N2	1	G	-	48.0	48.0	0.0	49.3	-	-	
N3	1	G	-	52.3	52.3	0.0	58.6	-	-	
N4	1	G	-	52.8	52.8	0.0	54.4	-	-	
O1	1	B	67	47.3	48.2	0.9	53.3	5.1	6.0	
O2	1	G	-	39.0	39.6	0.6	53.8	-	-	
O3	1	G	-	39.1	39.6	0.5	54.4	-	-	
P1	1	G	-	57.2	58.1	0.9	59.1	-	-	
P2	1	G	-	57.7	58.7	1.0	60.1	-	-	
Q1	1	G	-	64.1	65.1	1.0	64.8	-	-	
Q2	1	B	67	49.0	50.0	1.0	50.1	0.1	1.1	
Q3	1	G	-	61.2	62.2	1.0	63.2	-	-	
Q4	1	G	-	60.4	61.4	1.0	58.9	-	-	
Q5	1	B	67	59.9	60.8	0.9	58.3	-2.5	-1.6	(4)
R1	1	C	67	52.0	53.0	1.0	52.8	-0.2	0.8	
R2	1	B	67	53.5	54.5	1.0	54.5	0.0	1.0	
R3	1	B	67	49.3	50.3	1.0	50.2	-0.1	0.9	
R4	1	B	67	49.0	50.0	1.0	49.9	-0.1	0.9	
R5	1	B	67	50.2	51.2	1.0	51.2	0.0	1.0	

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
R6	1	B	67	51.0	51.9	0.9	51.9	0.0	0.9	
R7	1	B	67	54.8	55.8	1.0	55.5	-0.3	0.7	
S1	1	B	67	56.3	57.3	1.0	57.3	0.0	1.0	
S2	1	B	67	56.3	57.3	1.0	57.4	0.1	1.1	
S3	1	B	67	58.3	59.3	1.0	59.4	0.1	1.1	
S4	1	F	-	47.6	48.6	1.0	48.7	-	-	
TP1	1	C	67	-	-	-	71.1			
TP2	1	C	67	-	-	-	71.4			
TP3	1	C	67	-	-	-	71.5			
TP4	1	C	67	-	-	-	71.2			
TP5	1	C	67	-	-	-	71.0			
TP6	1	C	67	-	-	-	71.2			
TP7	1	C	67	-	-	-	71.2			
TP8	1	C	67	-	-	-	71.2			
TP9	1	C	67	-	-	-	71.4			
TO1	1	C	67	-	-	-	71.3			
TO2	1	C	67	-	-	-	71.1			
TO3	1	C	67	-	-	-	71.1			
TO4	1	C	67	-	-	-	71.2			
TO5	1	C	67	-	-	-	68.2			
TO6	1	C	67	-	-	-	66.3			
TO7	1	C	67	-	-	-	66.2			
TO8	1	C	67	-	-	-	67.5			
TO9	1	C	67	-	-	-	67.3			
TO10	1	C	67	-	-	-	66.7			
TO11	1	C	67	-	-	-	67.0			
TO12	1	C	67	-	-	-	67.0			
TO13	1	C	67	-	-	-	66.9			
TO14	1	C	67	-	-	-	66.8			
TN1	1	C	67	-	-	-	66.9			
TN2	1	C	67	-	-	-	65.9			
TN3	1	C	67	-	-	-	67.9			
TM1	1	C	67	-	-	-	66.7			
TM2	1	C	67	-	-	-	66.3			
TM3	1	C	67	-	-	-	67.9			
TM4	1	C	67	-	-	-	65.6			
TM5	1	C	67	-	-	-	66.5			
TM6	1	C	67	-	-	-	67.4			
TM7	1	C	67	-	-	-	68.0			
TM8	1	C	67	-	-	-	67.6			
TL1	1	C	67	-	-	-	67.5			
TL2	1	C	67	-	-	-	67.4			
TL3	1	C	67	-	-	-	67.5			
TL4	1	C	67	-	-	-	67.4			
TL5	1	C	67	-	-	-	67.4			
TL6	1	C	67	-	-	-	67.4			
TL7	1	C	67	-	-	-	67.4			
TL8	1	C	67	-	-	-	67.1			
TL9	1	C	67	-	-	-	66.4			
TL10	1	C	67	-	-	-	66.9			
TK1	1	C	67	-	-	-	64.8			
TK2	1	C	67	-	-	-	64.1			
TK3	1	C	67	-	-	-	63.9			
TK4	1	C	67	-	-	-	64.0			
TK5	1	C	67	-	-	-	64.0			
TK6	1	C	67	-	-	-	64.2			
TK7	1	C	67	-	-	-	64.2			
TK8	1	C	67	-	-	-	63.9			
TK9	1	C	67	-	-	-	63.8			
TK10	1	C	67	-	-	-	65.6			
TK11	1	C	67	-	-	-	66.0			
TK12	1	C	67	-	-	-	65.6			
TK13	1	C	67	-	-	-	65.6			
TK14	1	C	67	-	-	-	65.6			
TK15	1	C	67	-	-	-	65.6			
TK16	1	C	67	-	-	-	65.7			

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
TK17	1	C	67	-	-	-	65.7			
TK18	1	C	67	-	-	-	65.5			
TK19	1	C	67	-	-	-	65.1			
TK20	1	C	67	-	-	-	64.8			
TK21	1	C	67	-	-	-	64.9			
TJ1	1	C	67	-	-	-	63.4			
TJ2	1	C	67	-	-	-	62.7			
TJ3	1	C	67	-	-	-	63.3			
TJ4	1	C	67	-	-	-	63.6			
TJ5	1	C	67	-	-	-	64.7			
TJ6	1	C	67	-	-	-	64.6			
TJ7	1	C	67	-	-	-	65.0			
TJ8	1	C	67	-	-	-	65.2			
TI1	1	C	67	-	-	-	66.3			
TI2	1	C	67	-	-	-	66.3			
TI3	1	C	67	-	-	-	66.4			
TI4	1	C	67	-	-	-	65.2			
TI5	1	C	67	-	-	-	65.8			
TI6	1	C	67	-	-	-	66.5			
TI7	1	C	67	-	-	-	66.5			
TI8	1	C	67	-	-	-	66.5			
TI9	1	C	67	-	-	-	66.5			
TI10	1	C	67	-	-	-	66.0			
TI11	1	C	67	-	-	-	65.9			
TI12	1	C	67	-	-	-	66.3			
TI13	1	C	67	-	-	-	66.3			
TI14	1	C	67	-	-	-	66.4			
TI15	1	C	67	-	-	-	66.6			
TI16	1	C	67	-	-	-	63.0			
TI17	1	C	67	-	-	-	62.9			
TI18	1	C	67	-	-	-	62.9			
TI19	1	C	67	-	-	-	62.7			
TI20	1	C	67	-	-	-	62.9			
TI21	1	C	67	-	-	-	63.6			
TI22	1	C	67	-	-	-	63.6			
TI23	1	C	67	-	-	-	63.5			
TI24	1	C	67	-	-	-	62.9			
TI25	1	C	67	-	-	-	62.8			
TI26	1	C	67	-	-	-	62.8			
TI27	1	C	67	-	-	-	62.8			
TI28	1	C	67	-	-	-	62.8			
TI29	1	C	67	-	-	-	62.8			
TI30	1	C	67	-	-	-	62.8			
TI31	1	C	67	-	-	-	62.9			
TI32	1	C	67	-	-	-	62.9			
KA1	1	C	67	50.0	-	-	53.9	-	3.9	
KA2	1	C	67	51.9	-	-	53.9	-	2.0	
KA3	1	C	67	50.3	-	-	49.7	-	-0.6	
KA4	1	C	67	50.0	-	-	49.1	-	-0.9	
KA5	1	C	67	50.0	-	-	48.7	-	-1.3	
KA6	1	C	67	49.7	-	-	48.3	-	-1.4	
KA7	1	C	67	49.3	-	-	48.3	-	-1.0	
KA8	1	C	67	49.1	-	-	48.2	-	-0.9	
KA9	1	C	67	48.4	-	-	48.3	-	-0.1	
KA10	1	C	67	47.9	-	-	47.9	-	0.0	
KA11	1	C	67	47.5	-	-	47.6	-	0.1	
KA12	1	C	67	47.1	-	-	47.2	-	0.1	
KA13	1	C	67	46.7	-	-	46.9	-	0.2	
KA14	1	C	67	46.6	-	-	46.8	-	0.2	
KA15	1	C	67	46.4	-	-	46.6	-	0.2	
KA16	1	C	67	45.6	-	-	45.8	-	0.2	
KA17	1	C	67	45.1	-	-	45.4	-	0.3	
KA18	1	C	67	44.6	-	-	45.0	-	0.4	
KA19	1	C	67	42.9	-	-	43.4	-	0.5	
KA20	1	C	67	42.0	-	-	42.7	-	0.7	
KA21	1	C	67	41.3	-	-	42.1	-	0.8	

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Noise Analysis Summary Table
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Noise Level Comparison	
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Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
KA22	1	C	67	39.5	-	-	40.8	-	1.3	
KA23	1	C	67	38.5	-	-	40.1	-	1.6	
KA24	1	C	67	37.5	-	-	39.6	-	2.1	
KA25	1	C	67	35.2	-	-	38.1	-	2.9	
JA1	1	C	67	54.6	-	-	58.0	-	3.4	
JA2	1	C	67	48.5	-	-	53.3	-	4.8	
JA3	1	C	67	42.4	-	-	48.7	-	6.3	
JA4	1	C	67	40.2	-	-	47.7	-	7.5	
JA5	1	C	67	39.0	-	-	46.0	-	7.0	
JA6	1	C	67	36.9	-	-	44.5	-	7.6	
JA7	1	C	67	34.5	-	-	39.9	-	5.4	
JA8	1	C	67	43.4	-	-	47.4	-	4.0	
JA9	1	C	67	56.5	-	-	59.7	-	3.2	
JA10	1	C	67	54.3	-	-	57.4	-	3.1	
JA11	1	C	67	53.8	-	-	57.0	-	3.2	
JA12	1	C	67	51.2	-	-	54.3	-	3.1	
JA13	1	C	67	54.1	-	-	57.3	-	3.2	
JA14	1	C	67	46.2	-	-	49.8	-	3.6	
JA15	1	C	67	43.0	-	-	47.4	-	4.4	
JA16	1	C	67	40.3	-	-	46.0	-	5.7	
JA17	1	C	67	37.0	-	-	41.6	-	4.6	
JA18	1	C	67	34.2	-	-	39.2	-	5.0	
JA19	1	C	67	31.6	-	-	38.5	-	6.9	
JA20	1	C	67	32.1	-	-	37.6	-	5.5	
JA21	1	C	67	33.0	-	-	37.5	-	4.5	
JA22	1	C	67	31.7	-	-	36.4	-	4.7	
MA1	1	C	67	57.6	-	-	59.6	-	2.0	
MA2	1	C	67	54.6	-	-	56.6	-	2.0	
MA3	1	C	67	47.3	-	-	48.0	-	0.7	
IA1	1	C	67	28.1	-	-	36.8	-	8.7	
IA2	1	C	67	27.1	-	-	35.4	-	8.3	
IA3	1	C	67	28.3	-	-	34.5	-	6.2	
IA4	1	C	67	31.7	-	-	35.5	-	3.8	
IA5	1	C	67	40.0	-	-	42.6	-	2.6	
I30A	1	C	67	58.4	59.6	1.2	56.3	-3.3	-2.1	
I30B	1	C	67	58.4	59.6	1.2	55.5	-4.1	-2.9	
I30C	1	C	67	58.4	59.6	1.2	53.7	-5.9	-4.7	
I30D	1	C	67	58.5	59.6	1.1	52.8	-6.8	-5.7	
I30E	1	C	67	58.4	59.6	1.2	51.7	-7.9	-6.7	
I30F	1	C	67	58.4	59.6	1.2	51.3	-8.3	-7.1	
I30G	1	C	67	58.4	59.6	1.2	51.3	-8.3	-7.1	
I30H	1	C	67	58.3	59.4	1.1	51.3	-8.1	-7.0	
I30I	1	C	67	58.3	59.5	1.2	51.3	-8.2	-7.0	
I30J	1	C	67	58.5	59.7	1.2	51.3	-8.4	-7.2	
I30K	1	C	67	58.5	59.7	1.2	51.4	-8.3	-7.1	
I30L	1	C	67	58.6	59.7	1.1	51.6	-8.1	-7.0	

Notes

(1) Reduced Noise level due to moving of noise source of existing CR8 or reduced design speed along 26th St NE (Existing is 55mph, Build is 45mph)
(2) Reduced noise level due to reduced adjancet local traffic based on expected local traffic rerout along Fox Hollow Ln
(3) 'Receptors are for Good Shepard church. One total receptor
(4) Large reduction in noise level due to lower traffic along 18th St due to traffic being directed on East Side Corridor

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-2: Wall K1 Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall K1	K1	B	1	67	60.0	50.7	9.3	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K2	B	1	67	57.9	44.3	13.6	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K3	B	1	67	52.3	42.6	9.7	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K4	B	1	67	54.6	44.9	9.7	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K5	B	1	67	54.8	44.3	10.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K6	B	1	67	50.4	41.9	8.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K7	B	1	67	52.1	45.6	6.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K8	B	1	67	49.6	44.1	5.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K9	B	1	67	60.6	46.9	13.7	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K10	B	1	67	52.3	43.9	8.4	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K11	B	1	67	60.4	45.0	15.4	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K12	B	1	67	58.6	44.5	14.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K13	B	1	67	58.8	44.6	14.2	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K14	B	1	67	58.7	44.7	14	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K15	B	1	67	58.8	44.7	14.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K16	B	1	67	58.5	45.2	13.3	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K17	B	1	67	57.8	45.6	12.2	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K18	B	1	67	54.9	45.8	9.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K19	B	1	67	55.0	46.9	8.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K20	B	1	67	52.2	47.0	5.2	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K21	B	1	67	62.0	58.6	3.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K22	B	1	67	61.1	59.7	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K23	B	1	67	44.4	43.6	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K24	B	1	67	41.2	40.6	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K25	B	1	67	44.9	42.0	2.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K26	B	1	67	44.8	41.2	3.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K27	B	1	67	46.9	43.6	3.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K28	B	1	67	48.3	43.8	4.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K29	B	1	67	48.7	42.8	5.9	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K30	B	1	67	35.1	34.5	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K31	B	1	67	39.9	38.5	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K32	B	1	67	45.2	43.3	1.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K33	B	1	67	45.3	41.2	4.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K34	B	1	67	47.5	43.7	3.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K35	B	1	67	49.6	44.5	5.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K36	B	1	67	49.1	45.4	3.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K37	B	1	67	62.4	61.6	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K38	B	1	67	62.3	61.6	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K39	B	1	67	62.1	61.8	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K40	B	1	67	62.8	62.5	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K41	B	1	67	43.9	42.0	1.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K42	B	1	67	43.4	42.7	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K43	B	1	67	43.7	41.7	2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K44	B	1	67	46.5	44.0	2.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K45	B	1	67	44.5	42.9	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K46	B	1	67	46.9	43.4	3.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K47	B	1	67	45.6	43.4	2.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K48	B	1	67	45.3	41.5	3.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K49	B	1	67	43.7	41.0	2.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K50	B	1	67	40.4	39.2	1.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K51	B	1	67	41.6	40.1	1.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K52	B	1	67	40.7	39.1	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K53	B	1	67	44.4	40.4	4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K54	B	1	67	41.2	36.8	4.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K55	B	1	67	39.9	36.9	3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K56	B	1	67	41.0	38.0	3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K57	B	1	67	48.0	42.9	5.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K58	B	1	67	45.9	41.3	4.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K59	B	1	67	46.4	41.5	4.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K60	B	1	67	46.5	41.4	5.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K61	B	1	67	45.9	41.4	4.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K62	B	1	67	63.2	62.1	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K63	B	1	67	63.2	62.1	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K64	B	1	67	63.1	62.1	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K65	B	1	67	63.1	62.1	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K66	B	1	67	63.0	62.1	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K67	B	1	67	63.0	62.1	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K68	B	1	67	61.4	61.4	0	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K69	B	1	67	62.0	61.6	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K70	B	1	67	59.5	59.4	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K71	B	1	67	60.3	60.4	-0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K72	B	1	67	43.3	42.0	1.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K73	B	1	67	43.0	41.9	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K74	B	1	67	43.1	42.2	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K75	B	1	67	44.1	43.3	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K76	B	1	67	46.0	45.7	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K77	B	1	67	49.1	49.0	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K78	B	1	67	43.2	42.4	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K79	B	1	67	43.9	43.0	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K80	B	1	67	44.1	43.3	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K81	B	1	67	45.0	44.5	0.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K82	B	1	67	45.8	45.5	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K83	B	1	67	49.4	49.3	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K84	B	1	67	42.5	41.1	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K85	B	1	67	42.8	41.7	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K86	B	1	67	42.8	42.0	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K87	B	1	67	43.0	42.4	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K88	B	1	67	44.1	43.7	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K89	B	1	67	46.5	46.3	0.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K90	B	1	67	43.7	42.7	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K91	B	1	67	44.7	44.2	0.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K92	B	1	67	46.7	46.4	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K93	B	1	67	45.0	44.6	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K94	B	1	67	45.4	45.1	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K95	B	1	67	47.9	47.8	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K96	B	1	67	44.9	42.8	2.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K97	B	1	67	44.4	42.9	1.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K98	B	1	67	44.1	43.1	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K99	B	1	67	44.3	43.8	0.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K100	B	1	67	45.5	45.1	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K101	B	1	67	50.7	50.6	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K102	B	1	67	43.3	40.7	2.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K103	B	1	67	43.0	41.0	2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K104	B	1	67	42.7	41.4	1.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K105	B	1	67	43.2	42.4	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K106	B	1	67	44.8	44.4	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K107	B	1	67	49.0	48.9	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K108	B	1	67	40.0	37.6	2.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K109	B	1	67	40.0	37.9	2.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K110	B	1	67	39.7	38.6	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K111	B	1	67	40.6	39.9	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K112	B	1	67	42.9	42.6	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K113	B	1	67	49.3	49.2	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K114	B	1	67	39.8	37.9	1.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K115	B	1	67	40.1	38.5	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K116	B	1	67	40.6	39.5	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K117	B	1	67	42.4	41.7	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K118	B	1	67	44.8	44.6	0.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K119	B	1	67	48.8	48.7	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K120	B	1	67	41.1	38.6	2.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K121	B	1	67	41.4	39.5	1.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K122	B	1	67	41.5	39.8	1.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K123	B	1	67	41.5	40.3	1.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K124	B	1	67	42.5	41.8	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K125	B	1	67	46.4	46.1	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K126	B	1	67	41.6	40.2	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K127	B	1	67	41.9	39.6	2.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K128	B	1	67	40.4	38.8	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K129	B	1	67	41.1	39.9	1.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K130	B	1	67	43.3	42.7	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K131	B	1	67	47.5	47.3	0.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K132	B	1	67	44.3	40.4	3.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K133	B	1	67	43.1	39.5	3.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K134	B	1	67	41.4	38.1	3.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K135	B	1	67	41.8	39.4	2.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K136	B	1	67	41.9	40.3	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K137	B	1	67	45.2	44.6	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K138	B	1	67	44.2	39.7	4.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K139	B	1	67	42.0	38.0	4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K140	B	1	67	41.2	38.4	2.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K141	B	1	67	41.5	39.9	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K142	B	1	67	43.8	43.1	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K143	B	1	67	43.0	39.5	3.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K144	B	1	67	41.9	40.3	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K145	B	1	67	45.2	44.6	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K146	B	1	67	44.2	39.7	4.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K147	B	1	67	42.0	38.0	4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
10ft height																	
Wall K1	K1	B	1	67	60.0	54.5	5.5	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K2	B	1	67	57.9	48.8	9.1	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K3	B	1	67	52.3	46.6	5.7	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K4	B	1	67	54.6	48.7	5.9	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K5	B	1	67	54.8	48.3	6.5	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K6	B	1	67	50.4	46.1	4.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K7	B	1	67	52.1	47.6	4.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K8	B	1	67	49.6	46.6	3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K9	B	1	67	60.6	50.6	10	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K10	B	1	67	52.3	46.8	5.5	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K11	B	1	67	60.4	49.6	10.8	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K12	B	1	67	58.6	49.8	8.8	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K13	B	1	67	58.8	49.4	9.4	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K14	B	1	67	58.7	50.1	8.6	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K15	B	1	67	58.8	49.6	9.2	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K16	B	1	67	58.5	50.0	8.5	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K17	B	1	67	57.8	51.2	6.6	1	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K18	B	1	67	54.9	51.1	3.8	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K19	B	1	67	55.0	51.4	3.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K20	B	1	67	52.2	48.6	3.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct

												Noise Level Comparison				
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K21	B	1	67	62.0	59.5	2.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K22	B	1	67	61.1	60.0	1.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K23	B	1	67	44.4	44.0	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K24	B	1	67	41.2	41.0	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K25	B	1	67	44.9	43.4	1.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K26	B	1	67	44.8	42.6	2.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K27	B	1	67	46.9	45.0	1.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K28	B	1	67	48.3	45.5	2.8	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K29	B	1	67	48.7	45.2	3.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K30	B	1	67	35.1	34.8	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K31	B	1	67	39.9	39.2	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K32	B	1	67	45.2	43.8	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K33	B	1	67	45.3	42.3	3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K34	B	1	67	47.5	44.5	3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K35	B	1	67	49.6	45.3	4.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K36	B	1	67	49.1	45.9	3.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K37	B	1	67	62.4	61.7	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K38	B	1	67	62.3	61.7	0.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K39	B	1	67	62.1	61.8	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K40	B	1	67	62.8	62.5	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K41	B	1	67	43.9	43.1	0.8	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K42	B	1	67	43.4	43.0	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K43	B	1	67	43.7	42.5	1.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K44	B	1	67	46.5	45.1	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K45	B	1	67	44.5	43.6	0.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K46	B	1	67	46.9	44.7	2.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K47	B	1	67	45.6	44.2	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K48	B	1	67	45.3	43.1	2.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K49	B	1	67	43.7	42.2	1.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K50	B	1	67	40.4	39.7	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K51	B	1	67	41.6	40.4	1.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K52	B	1	67	40.7	39.5	1.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K53	B	1	67	44.4	41.4	3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K54	B	1	67	41.2	38.1	3.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K55	B	1	67	39.9	37.9	2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K56	B	1	67	41.0	38.9	2.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K57	B	1	67	48.0	43.6	4.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K58	B	1	67	45.9	41.9	4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K59	B	1	67	46.4	42.2	4.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K60	B	1	67	46.5	42.0	4.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K61	B	1	67	45.9	41.8	4.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K62	B	1	67	63.2	62.2	1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K63	B	1	67	63.2	62.1	1.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K64	B	1	67	63.1	62.1	1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K65	B	1	67	63.1	62.1	1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K66	B	1	67	63.0	62.1	0.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K67	B	1	67	63.0	62.1	0.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K68	B	1	67	61.4	61.4	0	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K69	B	1	67	62.0	61.6	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K70	B	1	67	59.5	59.4	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K71	B	1	67	60.3	60.4	-0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K72	B	1	67	43.3	42.7	0.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K73	B	1	67	43.0	42.3	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K74	B	1	67	43.1	42.6	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K75	B	1	67	44.1	43.7	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K76	B	1	67	46.0	45.8	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K77	B	1	67	49.1	49.1	0	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K78	B	1	67	43.2	42.8	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K79	B	1	67	43.9	43.5	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K80	B	1	67	44.1	43.8	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K81	B	1	67	45.0	44.7	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K82	B	1	67	45.8	45.7	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K83	B	1	67	49.4	49.3	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K84	B	1	67	42.5	41.8	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K85	B	1	67	42.8	42.2	0.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K86	B	1	67	42.8	42.4	0.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K87	B	1	67	43.0	42.7	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K88	B	1	67	44.1	43.9	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K89	B	1	67	46.5	46.4	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K90	B	1	67	43.7	43.1	0.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K91	B	1	67	44.7	44.4	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K92	B	1	67	46.7	46.5	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K93	B	1	67	45.0	44.8	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K94	B	1	67	45.4	45.2	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K95	B	1	67	47.9	47.9	0	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K96	B	1	67	44.9	43.4	1.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K97	B	1	67	44.4	43.3	1.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K98	B	1	67	44.1	43.4	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K99	B	1	67	44.3	44.0	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K100	B	1	67	45.5	45.2	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K101	B	1	67	50.7	50.6	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K102	B	1	67	43.3	41.6	1.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K103	B	1	67	43.0	41.7	1.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K104	B	1	67	42.7	41.9	0.8	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K105	B	1	67	43.2	42.7	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K106	B	1	67	44.8	44.5	0.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K107	B	1	67	49.0	48.9	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K108	B	1	67	40.0	38.1	1.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct
Wall K1	K109	B	1	67	40.0	38.4	1.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct

														Noise Level Comparison				
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K110	B	1	67	39.7	38.9	0.8	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K111	B	1	67	40.6	40.1	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K112	B	1	67	42.9	42.7	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K113	B	1	67	49.3	49.2	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K114	B	1	67	39.8	38.5	1.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K115	B	1	67	40.1	39.0	1.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K116	B	1	67	40.6	39.9	0.7	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K117	B	1	67	42.4	41.9	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K118	B	1	67	44.8	44.7	0.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K119	B	1	67	48.8	48.8	0	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K120	B	1	67	41.1	39.2	1.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K121	B	1	67	41.4	39.8	1.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K122	B	1	67	41.5	40.1	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K123	B	1	67	41.5	40.6	0.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K124	B	1	67	42.5	41.9	0.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K125	B	1	67	46.4	46.2	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K126	B	1	67	41.6	40.6	1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K127	B	1	67	41.9	40.1	1.8	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K128	B	1	67	40.4	39.2	1.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K129	B	1	67	41.1	40.2	0.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K130	B	1	67	43.3	42.8	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K131	B	1	67	47.5	47.3	0.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K132	B	1	67	44.3	40.8	3.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K133	B	1	67	43.1	39.9	3.2	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K134	B	1	67	41.4	38.5	2.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K135	B	1	67	41.8	39.7	2.1	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K136	B	1	67	41.9	40.5	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K137	B	1	67	45.2	44.7	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K138	B	1	67	44.2	40.3	3.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K139	B	1	67	42.0	38.6	3.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K140	B	1	67	41.2	38.8	2.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K141	B	1	67	41.5	40.1	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K142	B	1	67	43.8	43.2	0.6	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K143	B	1	67	43.0	39.7	3.3	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K144	B	1	67	41.9	40.5	1.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K145	B	1	67	45.2	44.7	0.5	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K146	B	1	67	44.2	40.3	3.9	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
Wall K1	K147	B	1	67	42.0	38.6	3.4	0	14	Yes	Yes	10	2430	24300	$ 874,800	$ 62,486	Propose to Construct	
8ft height																		
Wall K1	K1	B	1	67	60.0	55.6	4.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K2	B	1	67	57.9	51.0	6.9	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K3	B	1	67	52.3	48.6	3.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K4	B	1	67	54.6	50.6	4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K5	B	1	67	54.8	50.3	4.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K6	B	1	67	50.4	46.9	3.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K7	B	1	67	52.1	48.7	3.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K8	B	1	67	49.6	47.3	2.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K9	B	1	67	60.6	52.0	8.6	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K10	B	1	67	52.3	47.4	4.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K11	B	1	67	60.4	51.0	9.4	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K12	B	1	67	58.6	51.6	7	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K13	B	1	67	58.8	51.7	7.1	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K14	B	1	67	58.7	51.8	6.9	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K15	B	1	67	58.8	51.9	6.9	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K16	B	1	67	58.5	51.6	6.9	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K17	B	1	67	57.8	52.5	5.3	1	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K18	B	1	67	54.9	52.4	2.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K19	B	1	67	55.0	52.5	2.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	

														Noise Level Comparison				
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K20	B	1	67	52.2	48.9	3.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K21	B	1	67	62.0	59.8	2.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K22	B	1	67	61.1	60.1	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K23	B	1	67	44.4	44.1	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K24	B	1	67	41.2	41.0	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K25	B	1	67	44.9	43.8	1.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K26	B	1	67	44.8	42.8	2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K27	B	1	67	46.9	45.5	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K28	B	1	67	48.3	45.8	2.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K29	B	1	67	48.7	45.4	3.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K30	B	1	67	35.1	34.7	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K31	B	1	67	39.9	39.2	0.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K32	B	1	67	45.2	43.8	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K33	B	1	67	45.3	42.5	2.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K34	B	1	67	47.5	44.7	2.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K35	B	1	67	49.6	45.4	4.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K36	B	1	67	49.1	45.9	3.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K37	B	1	67	62.4	61.8	0.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K38	B	1	67	62.3	61.7	0.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K39	B	1	67	62.1	61.9	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K40	B	1	67	62.8	62.5	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K41	B	1	67	43.9	43.3	0.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K42	B	1	67	43.4	43.1	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K43	B	1	67	43.7	42.6	1.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K44	B	1	67	46.5	45.3	1.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K45	B	1	67	44.5	43.7	0.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K46	B	1	67	46.9	44.9	2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K47	B	1	67	45.6	44.3	1.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K48	B	1	67	45.3	43.3	2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K49	B	1	67	43.7	42.3	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K50	B	1	67	40.4	39.7	0.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K51	B	1	67	41.6	40.4	1.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K52	B	1	67	40.7	39.6	1.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K53	B	1	67	44.4	41.5	2.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K54	B	1	67	41.2	38.2	3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K55	B	1	67	39.9	38.2	1.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K56	B	1	67	41.0	39.0	2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K57	B	1	67	48.0	43.7	4.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K58	B	1	67	45.9	42.0	3.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K59	B	1	67	46.4	42.3	4.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K60	B	1	67	46.5	42.1	4.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K61	B	1	67	45.9	41.8	4.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K62	B	1	67	63.2	62.2	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K63	B	1	67	63.2	62.1	1.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K64	B	1	67	63.1	62.1	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K65	B	1	67	63.1	62.1	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K66	B	1	67	63.0	62.1	0.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K67	B	1	67	63.0	62.1	0.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K68	B	1	67	61.4	61.4	0	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K69	B	1	67	62.0	61.6	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K70	B	1	67	59.5	59.4	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K71	B	1	67	60.3	60.4	-0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K72	B	1	67	43.3	42.8	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K73	B	1	67	43.0	42.5	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K74	B	1	67	43.1	42.7	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K75	B	1	67	44.1	43.7	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K76	B	1	67	46.0	45.8	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	
Wall K1	K77	B	1	67	49.1	49.1	0	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct	

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K78	B	1	67	43.2	42.9	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K79	B	1	67	43.9	43.5	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K80	B	1	67	44.1	43.8	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K81	B	1	67	45.0	44.8	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K82	B	1	67	45.8	45.7	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K83	B	1	67	49.4	49.3	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K84	B	1	67	42.5	41.8	0.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K85	B	1	67	42.8	42.3	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K86	B	1	67	42.8	42.4	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K87	B	1	67	43.0	42.7	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K88	B	1	67	44.1	43.9	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K89	B	1	67	46.5	46.4	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K90	B	1	67	43.7	43.2	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K91	B	1	67	44.7	44.5	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K92	B	1	67	46.7	46.5	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K93	B	1	67	45.0	44.8	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K94	B	1	67	45.4	45.2	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K95	B	1	67	47.9	47.9	0	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K96	B	1	67	44.9	43.5	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K97	B	1	67	44.4	43.4	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K98	B	1	67	44.1	43.5	0.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K99	B	1	67	44.3	44.0	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K100	B	1	67	45.5	45.3	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K101	B	1	67	50.7	50.7	0	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K102	B	1	67	43.3	41.7	1.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K103	B	1	67	43.0	41.8	1.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K104	B	1	67	42.7	41.9	0.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K105	B	1	67	43.2	42.7	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K106	B	1	67	44.8	44.5	0.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K107	B	1	67	49.0	48.9	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K108	B	1	67	40.0	38.2	1.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K109	B	1	67	40.0	38.5	1.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K110	B	1	67	39.7	39.0	0.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K111	B	1	67	40.6	40.1	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K112	B	1	67	42.9	42.7	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K113	B	1	67	49.3	49.2	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K114	B	1	67	39.8	38.6	1.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K115	B	1	67	40.1	39.1	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K116	B	1	67	40.6	39.9	0.7	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K117	B	1	67	42.4	41.9	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K118	B	1	67	44.8	44.7	0.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K119	B	1	67	48.8	48.8	0	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K120	B	1	67	41.1	39.3	1.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K121	B	1	67	41.4	39.9	1.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K122	B	1	67	41.5	40.1	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K123	B	1	67	41.5	40.6	0.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K124	B	1	67	42.5	41.9	0.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K125	B	1	67	46.4	46.2	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K126	B	1	67	41.6	40.6	1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K127	B	1	67	41.9	40.1	1.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K128	B	1	67	40.4	39.3	1.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K129	B	1	67	41.1	40.2	0.9	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K130	B	1	67	43.3	42.9	0.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K131	B	1	67	47.5	47.3	0.2	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K132	B	1	67	44.3	40.9	3.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K133	B	1	67	43.1	40.0	3.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K134	B	1	67	41.4	38.6	2.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K135	B	1	67	41.8	39.7	2.1	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct

														Noise Level Comparison				
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K136	B	1	67	41.9	40.5	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K137	B	1	67	45.2	44.7	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K138	B	1	67	44.2	40.4	3.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K139	B	1	67	42.0	38.7	3.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K140	B	1	67	41.2	38.9	2.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K141	B	1	67	41.5	40.2	1.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K142	B	1	67	43.8	43.2	0.6	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K143	B	1	67	43.0	39.7	3.3	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K144	B	1	67	41.9	40.5	1.4	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K145	B	1	67	45.2	44.7	0.5	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
Wall K1	K146	B	1	67	44.2	40.4	3.8	0	9	Yes	Yes	8	2430	19440	$ 699,840	$ 77,760	Propose to Construct
6ft height																		
Wall K1	K1	B	1	67	60.0	56.8	3.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K2	B	1	67	57.9	52.6	5.3	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K3	B	1	67	52.3	49.8	2.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K4	B	1	67	54.6	51.9	2.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K5	B	1	67	54.8	51.4	3.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K6	B	1	67	50.4	47.6	2.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K7	B	1	67	52.1	49.4	2.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K8	B	1	67	49.6	47.8	1.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K9	B	1	67	60.6	54.6	6	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K10	B	1	67	52.3	48.0	4.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K11	B	1	67	60.4	53.9	6.5	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K12	B	1	67	58.6	53.1	5.5	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K13	B	1	67	58.8	53.2	5.6	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K14	B	1	67	58.7	53.3	5.4	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K15	B	1	67	58.8	53.1	5.7	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K16	B	1	67	58.5	53.3	5.2	1	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K17	B	1	67	57.8	54.4	3.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K18	B	1	67	54.9	54.4	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K19	B	1	67	55.0	54.5	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K20	B	1	67	52.2	49.3	2.9	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K21	B	1	67	62.0	60.2	1.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K22	B	1	67	61.1	60.3	0.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K23	B	1	67	44.4	44.2	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K24	B	1	67	41.2	41.0	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K25	B	1	67	44.9	44.0	0.9	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K26	B	1	67	44.8	43.1	1.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K27	B	1	67	46.9	45.8	1.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K28	B	1	67	48.3	46.0	2.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K29	B	1	67	48.7	45.8	2.9	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K30	B	1	67	35.1	34.7	0.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K31	B	1	67	39.9	39.3	0.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K32	B	1	67	45.2	43.9	1.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K33	B	1	67	45.3	42.7	2.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K34	B	1	67	47.5	44.9	2.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K35	B	1	67	49.6	45.6	4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K36	B	1	67	49.1	46.0	3.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K37	B	1	67	62.4	61.8	0.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K38	B	1	67	62.3	61.8	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K39	B	1	67	62.1	61.9	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K40	B	1	67	62.8	62.5	0.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K41	B	1	67	43.9	43.4	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K42	B	1	67	43.4	43.1	0.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K43	B	1	67	43.7	42.7	1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K44	B	1	67	46.5	45.5	1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K45	B	1	67	44.5	43.8	0.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K46	B	1	67	46.9	45.1	1.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal

														Noise Level Comparison				
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K47	B	1	67	45.6	44.5	1.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K48	B	1	67	45.3	43.5	1.8	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K49	B	1	67	43.7	42.4	1.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K50	B	1	67	40.4	39.8	0.6	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K51	B	1	67	41.6	40.4	1.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K52	B	1	67	40.7	39.7	1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K53	B	1	67	44.4	41.6	2.8	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K54	B	1	67	41.2	38.3	2.9	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K55	B	1	67	39.9	38.3	1.6	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K56	B	1	67	41.0	39.1	1.9	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K57	B	1	67	48.0	43.9	4.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K58	B	1	67	45.9	42.1	3.8	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K59	B	1	67	46.4	42.4	4	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K60	B	1	67	46.5	42.2	4.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K61	B	1	67	45.9	41.9	4	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K62	B	1	67	63.2	62.2	1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K63	B	1	67	63.2	62.2	1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K64	B	1	67	63.1	62.1	1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K65	B	1	67	63.1	62.1	1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K66	B	1	67	63.0	62.1	0.9	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K67	B	1	67	63.0	62.1	0.9	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K68	B	1	67	61.4	61.4	0	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K69	B	1	67	62.0	61.6	0.4	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K70	B	1	67	59.5	59.4	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K71	B	1	67	60.3	60.4	-0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K72	B	1	67	43.3	42.9	0.4	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K73	B	1	67	43.0	42.5	0.5	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K74	B	1	67	43.1	42.7	0.4	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K75	B	1	67	44.1	43.8	0.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K76	B	1	67	46.0	45.8	0.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K77	B	1	67	49.1	49.1	0	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K78	B	1	67	43.2	43.0	0.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K79	B	1	67	43.9	43.6	0.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K80	B	1	67	44.1	43.9	0.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K81	B	1	67	45.0	44.9	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K82	B	1	67	45.8	45.7	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K83	B	1	67	49.4	49.4	0	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K84	B	1	67	42.5	41.9	0.6	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K85	B	1	67	42.8	42.4	0.4	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K86	B	1	67	42.8	42.5	0.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K87	B	1	67	43.0	42.7	0.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K88	B	1	67	44.1	43.9	0.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K89	B	1	67	46.5	46.4	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K90	B	1	67	43.7	43.2	0.5	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K91	B	1	67	44.7	44.5	0.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K92	B	1	67	46.7	46.6	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K93	B	1	67	45.0	44.9	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K94	B	1	67	45.4	45.3	0.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K95	B	1	67	47.9	47.9	0	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K96	B	1	67	44.9	43.6	1.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K97	B	1	67	44.4	43.5	0.9	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K98	B	1	67	44.1	43.5	0.6	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K99	B	1	67	44.3	44.0	0.3	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K100	B	1	67	45.5	45.3	0.2	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K101	B	1	67	50.7	50.7	0	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K102	B	1	67	43.3	41.8	1.5	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K103	B	1	67	43.0	41.9	1.1	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K104	B	1	67	42.7	42.0	0.7	0	8	Yes	No	6	2430	14580	$	524,880	N/A	Does Not Meet Noise Reduction Design Goal

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K105	B	1	67	43.2	42.8	0.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K106	B	1	67	44.8	44.6	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K107	B	1	67	49.0	48.9	0.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K108	B	1	67	40.0	38.4	1.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K109	B	1	67	40.0	38.6	1.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K110	B	1	67	39.7	39.0	0.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K111	B	1	67	40.6	40.2	0.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K112	B	1	67	42.9	42.7	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K113	B	1	67	49.3	49.2	0.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K114	B	1	67	39.8	38.7	1.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K115	B	1	67	40.1	39.2	0.9	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K116	B	1	67	40.6	40.0	0.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K117	B	1	67	42.4	41.9	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K118	B	1	67	44.8	44.7	0.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K119	B	1	67	48.8	48.8	0	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K120	B	1	67	41.1	39.4	1.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K121	B	1	67	41.4	39.9	1.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K122	B	1	67	41.5	40.2	1.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K123	B	1	67	41.5	40.7	0.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K124	B	1	67	42.5	42.0	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K125	B	1	67	46.4	46.2	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K126	B	1	67	41.6	40.6	1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K127	B	1	67	41.9	40.2	1.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K128	B	1	67	40.4	39.3	1.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K129	B	1	67	41.1	40.3	0.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K130	B	1	67	43.3	42.9	0.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K131	B	1	67	47.5	47.3	0.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K132	B	1	67	44.3	41.0	3.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K133	B	1	67	43.1	40.0	3.1	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K134	B	1	67	41.4	38.6	2.8	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K135	B	1	67	41.8	39.8	2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K136	B	1	67	41.9	40.5	1.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K137	B	1	67	45.2	44.7	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K138	B	1	67	44.2	40.5	3.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K139	B	1	67	42.0	38.8	3.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K140	B	1	67	41.2	39.0	2.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K141	B	1	67	41.5	40.2	1.3	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K142	B	1	67	43.8	43.2	0.6	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K143	B	1	67	43.0	39.8	3.2	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K144	B	1	67	41.9	40.5	1.4	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K145	B	1	67	45.2	44.7	0.5	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal
Wall K1	K146	B	1	67	44.2	40.5	3.7	0	8	Yes	No	6	2430	14580	$ 524,880	N/A	Does Not Meet Noise Reduction Design Goal

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-3: Wall TH Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TH	H1	B	1	67	56.6	56.6	0	0	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI4	C	1	67	65.2	64.4	0.8	0	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI5	C	1	67	65.8	47.3	18.5	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI6	C	1	67	66.5	45.5	21	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI7	C	1	67	66.5	44.4	22.1	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI8	C	1	67	66.5	44.9	21.6	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI9	C	1	67	66.5	52.9	13.6	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI10	C	1	67	66	43.5	22.5	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI11	C	1	67	65.9	44	21.9	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI12	C	1	67	66.3	44	22.3	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI13	C	1	67	66.3	43.4	22.9	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI14	C	1	67	66.4	43.6	22.8	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
Wall TH	TI15	C	1	67	66.6	43.9	22.7	1	11	Yes	Yes	20	2915	58300	$ 2,098,800.00	$ 190,800.00	Not Cost Effective
15ft height																	
Wall TH	H1	B	1	67	56.6	56.6	0	0	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI4	C	1	67	65.2	64.4	0.8	0	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI5	C	1	67	65.8	49	16.8	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI6	C	1	67	66.5	47.6	18.9	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI7	C	1	67	66.5	46.9	19.6	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI8	C	1	67	66.5	47.4	19.1	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI9	C	1	67	66.5	53.2	13.3	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI10	C	1	67	66	45.8	20.2	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI11	C	1	67	65.9	46.1	19.8	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI12	C	1	67	66.3	46.9	19.4	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI13	C	1	67	66.3	46.5	19.8	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI14	C	1	67	66.4	46.4	20	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
Wall TH	TI15	C	1	67	66.6	46.5	20.1	1	11	Yes	Yes	15	2915	43725	$ 1,574,100.00	$ 143,100.00	Not Cost Effective
10ft height																	
Wall TH	H1	B	1	67	56.6	56.6	0	0	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI4	C	1	67	65.2	64.5	0.7	0	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI5	C	1	67	65.8	52.1	13.7	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI6	C	1	67	66.5	51.4	15.1	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI7	C	1	67	66.5	50.7	15.8	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI8	C	1	67	66.5	51.3	15.2	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI9	C	1	67	66.5	53.4	13.1	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI10	C	1	67	66	48.8	17.2	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI11	C	1	67	65.9	49.5	16.4	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI12	C	1	67	66.3	50.4	15.9	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI13	C	1	67	66.3	50.7	15.6	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI14	C	1	67	66.4	50.5	15.9	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective
Wall TH	TI15	C	1	67	66.6	50.2	16.4	1	11	Yes	Yes	10	2915	29150	$ 1,049,400.00	$ 95,400.00	Not Cost Effective

														Noise Level Comparison		
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
8ft height																
Wall TH	H1	B	1	67	56.6	56.6	0	0	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI4	C	1	67	65.2	64.5	0.7	0	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI5	C	1	67	65.8	54.1	11.7	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI6	C	1	67	66.5	53.1	13.4	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI7	C	1	67	66.5	52.9	13.6	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI8	C	1	67	66.5	53.1	13.4	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI9	C	1	67	66.5	51.9	14.6	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI10	C	1	67	66	53.1	12.9	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI11	C	1	67	65.9	53.5	12.4	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI12	C	1	67	66.3	52.6	13.7	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI13	C	1	67	66.3	51.8	14.5	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI14	C	1	67	66.4	51.9	14.5	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
Wall TH	TI15	C	1	67	66.6	52.8	13.8	1	11	Yes	Yes	8	2915	23320	$ 839,520.00	$ 76,320.00	Propose to Construct
6ft height																	
Wall TH	H1	B	1	67	56.6	56.6	0	0	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI4	C	1	67	65.2	64.7	0.5	0	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI5	C	1	67	65.8	58.1	7.7	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI6	C	1	67	66.5	57.8	8.7	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI7	C	1	67	66.5	57.7	8.8	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI8	C	1	67	66.5	58	8.5	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI9	C	1	67	66.5	54.7	11.8	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI10	C	1	67	66	55.9	10.1	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI11	C	1	67	65.9	57	8.9	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI12	C	1	67	66.3	57.8	8.5	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI13	C	1	67	66.3	55.8	10.5	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI14	C	1	67	66.4	55.8	10.6	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct
Wall TH	TI15	C	1	67	66.6	56.1	10.5	1	11	Yes	Yes	6	2915	17490	$ 629,640.00	$ 57,240.00	Propose to Construct

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-4: Wall I Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall II	I2	B	1	67	58.9	51.1	7.8	1	1	Yes	Yes	20	400	8000	288000	288000	Not Cost Effective
15ft height																	
Wall II	I2	B	1	67	58.9	51.4	7.5	1	1	Yes	Yes	15	400	6000	216000	216000	Not Cost Effective
10ft height																	
Wall II	I2	B	1	67	58.9	52.4	6.5	1	1	Yes	No	10	400	4000	144000	N/A	Does Not Meet Noise Reduction Design Goal
8ft height																	
Wall II	I2	B	1	67	58.9	54	4.9	0	0	No	No	8	400	3200	115200	N/A	Does Not Meet Noise Reduction Design Goal
6ft height																	
Wall II	I2	B	1	67	58.9	54.4	4.5	0	0	No	No	6	400	2400	86400	N/A	Does Not Meet Noise Reduction Design Goal

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-5: Wall TI1 Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TI-1	I31	B	1	67	57.2	45.9	11.3	1	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	I32	G	1	-	58.4	57.6	0.8	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	I33	G	1	-	57.8	57.5	0.3	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	I34	G	1	-	57.3	57.2	0.1	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	I35	B	1	67	56.3	56.3	0	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	I42	G	10	-	45.4	41.9	3.5	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	I44	B	9	67	44.1	41	3.1	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	TI29	C	1	67	62.8	62.7	0.1	0	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	TI30	C	1	67	62.8	45	17.8	1	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	TI31	C	1	67	62.9	44.8	18.1	1	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
Wall TI-1	TI32	C	1	67	62.9	46.7	16.2	1	4	Yes	Yes	20	760	15200	$ 547,200.00	$ 136,800.00	Not Cost Effective
15ft height																	
Wall TI-1	I31	B	1	67	57.2	46.6	10.6	1	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	I32	G	1	-	58.4	57.6	0.8	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	I33	G	1	-	57.8	57.5	0.3	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	I34	G	1	-	57.3	57.2	0.1	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	I35	B	1	67	56.3	56.3	0	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	I42	G	10	-	45.4	42.2	3.2	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	I44	B	9	67	44.1	41.2	2.9	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	TI29	C	1	67	62.8	62.7	0.1	0	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	TI30	C	1	67	62.8	46.8	16	1	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	TI31	C	1	67	62.9	46.8	16.1	1	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
Wall TI-1	TI32	C	1	67	62.9	48.2	14.7	1	4	Yes	Yes	15	760	11400	$ 410,400.00	$ 102,600.00	Not Cost Effective
10ft height																	
Wall TI-1	I31	B	1	67	57.2	48.1	9.1	1	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	I32	G	1	-	58.4	57.8	0.6	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	I33	G	1	-	57.8	57.6	0.2	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	I34	G	1	-	57.3	57.3	0	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	I35	B	1	67	56.3	56.3	0	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	I42	G	10	-	45.4	44.5	0.9	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	I44	B	9	67	44.1	43.4	0.7	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	TI29	C	1	67	62.8	62.8	0	0	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	TI30	C	1	67	62.8	49.7	13.1	1	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	TI31	C	1	67	62.9	49.8	13.1	1	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
Wall TI-1	TI32	C	1	67	62.9	50.5	12.4	1	4	Yes	Yes	10	760	7600	$ 273,600.00	$ 68,400.00	Propose to Construct
8ft height																	
Wall TI-1	I31	B	1	67	57.2	50.9	6.3	1	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	I32	G	1	-	58.4	57.8	0.6	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	I33	G	1	-	57.8	57.6	0.2	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	I34	G	1	-	57.3	57.3	0	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	I35	B	1	67	56.3	56.3	0	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	I42	G	10	-	45.4	44.6	0.8	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	I44	B	9	67	44.1	43.5	0.6	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	TI29	C	1	67	62.8	62.8	0	0	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	TI30	C	1	67	62.8	52	10.8	1	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	TI31	C	1	67	62.9	52	10.9	1	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
Wall TI-1	TI32	C	1	67	62.9	52.5	10.4	1	4	Yes	Yes	8	760	6080	$ 218,880.00	$ 54,720.00	Propose to Construct
6ft height																	
Wall TI-1	I31	B	1	67	57.2	51.3	5.9	1	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	I32	G	1	-	58.4	57.8	0.6	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	I33	G	1	-	57.8	57.6	0.2	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	I34	G	1	-	57.3	57.3	0	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	I35	B	1	67	56.3	56.3	0	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	I42	G	10	-	45.4	44.8	0.6	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	I44	B	9	67	44.1	43.6	0.5	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	TI29	C	1	67	62.8	62.8	0	0	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	TI30	C	1	67	62.8	57.2	5.6	1	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	TI31	C	1	67	62.9	57.3	5.6	1	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-1	TI32	C	1	67	62.9	57.4	5.5	1	4	Yes	No	6	760	4560	$ 164,160.00	N/A	Does Not Meet Noise Reduction Design Goal

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-6: Wall TI2 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TI-2	I27	G	1	-	55.1	54	1.1	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I28	B	1	67	55.4	48.8	6.6	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I29	B	1	67	56.9	46	10.9	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I36	B	1	67	50.7	46.9	3.8	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I37	B	1	67	46.1	42.7	3.4	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I38	B	1	67	44.4	41.2	3.2	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I39	B	1	67	44.1	42	2.1	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I40	B	1	67	43.9	41.2	2.7	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I41	B	3	67	41.1	38.9	2.2	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I43	B	3	67	42.1	40.2	1.9	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I45	B	1	67	42.6	40.3	2.3	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	TI24	C	1	67	62.9	62.9	0	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	TI25	C	1	67	62.8	54	8.8	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	TI26	C	1	67	62.8	43.3	19.5	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	TI27	C	1	67	62.8	44	18.8	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	TI28	C	1	67	62.8	46	16.8	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30A	C	1	67	56.3	56	0.3	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30B	C	1	67	55.5	54.8	0.7	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30C	C	1	67	53.7	51.8	1.9	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30D	C	1	67	52.8	49.8	3	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30E	C	1	67	51.7	47	4.7	0	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30F	C	1	67	51.3	45.2	6.1	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30G	C	1	67	51.3	44.8	6.5	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30H	C	1	67	51.3	44.6	6.7	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30I	C	1	67	51.3	44.5	6.8	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30J	C	1	67	51.3	44.7	6.6	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30K	C	1	67	51.4	45.1	6.3	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct
Wall TI-2	I30L	C	1	67	51.6	45.6	6	1	13	Yes	Yes	20	895	17900	$ 644,400.00	$ 49,569.23	Propose to Construct

														Noise Level Comparison		
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
15ft height																
Wall TI-2	I27	G	1	-	55.1	54.1	1	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I28	B	1	67	55.4	49	6.4	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I29	B	1	67	56.9	46.6	10.3	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I36	B	1	67	50.7	47	3.7	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I37	B	1	67	46.1	42.8	3.3	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I38	B	1	67	44.4	41.4	3	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I39	B	1	67	44.1	42.1	2	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I40	B	1	67	43.9	41.3	2.6	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I41	B	3	67	41.1	39.1	2	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I43	B	3	67	42.1	40.3	1.8	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I45	B	1	67	42.6	40.4	2.2	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	TI24	C	1	67	62.9	62.9	0	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	TI25	C	1	67	62.8	54.2	8.6	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	TI26	C	1	67	62.8	45.3	17.5	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	TI27	C	1	67	62.8	46.1	16.7	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	TI28	C	1	67	62.8	47.7	15.1	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30A	C	1	67	56.3	56	0.3	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30B	C	1	67	55.5	54.9	0.6	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30C	C	1	67	53.7	52	1.7	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30D	C	1	67	52.8	50.1	2.7	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30E	C	1	67	51.7	47.5	4.2	0	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30F	C	1	67	51.3	46	5.3	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30G	C	1	67	51.3	45.7	5.6	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30H	C	1	67	51.3	45.5	5.8	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30I	C	1	67	51.3	45.4	5.9	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30J	C	1	67	51.3	45.6	5.7	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30K	C	1	67	51.4	45.9	5.5	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct
Wall TI-2	I30L	C	1	67	51.6	46.3	5.3	1	13	Yes	Yes	15	895	13425	$ 483,300.00	$ 37,176.92	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
10ft height																	
Wall TI-2	I27	G	1	-	55.1	54.1	1	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I28	B	1	67	55.4	49.5	5.9	1	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I29	B	1	67	56.9	48.1	8.8	1	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I36	B	1	67	50.7	47.5	3.2	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I37	B	1	67	46.1	43.6	2.5	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I38	B	1	67	44.4	42.2	2.2	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I39	B	1	67	44.1	42.6	1.5	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I40	B	1	67	43.9	42.5	1.4	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I41	B	3	67	41.1	40.1	1	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I43	B	3	67	42.1	41.1	1	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I45	B	1	67	42.6	41.2	1.4	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	TI24	C	1	67	62.9	62.9	0	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	TI25	C	1	67	62.8	54.7	8.1	1	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	TI26	C	1	67	62.8	48.6	14.2	1	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	TI27	C	1	67	62.8	49.3	13.5	1	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	TI28	C	1	67	62.8	50.4	12.4	1	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30A	C	1	67	56.3	56.1	0.2	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30B	C	1	67	55.5	55	0.5	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30C	C	1	67	53.7	52.5	1.2	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30D	C	1	67	52.8	50.9	1.9	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30E	C	1	67	51.7	49	2.7	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30F	C	1	67	51.3	48.1	3.2	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30G	C	1	67	51.3	47.9	3.4	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30H	C	1	67	51.3	47.7	3.6	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30I	C	1	67	51.3	47.6	3.7	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30J	C	1	67	51.3	47.6	3.7	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30K	C	1	67	51.4	47.8	3.6	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct
Wall TI-2	I30L	C	1	67	51.6	48.4	3.2	0	6	Yes	Yes	10	895	8950	$ 322,200.00	$ 53,700.00	Propose to Construct

													Noise Level Comparison			
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria		
8ft height																
Wall TI-2	I27	G	1	-	55.1	54.3	0.8	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I28	B	1	67	55.4	50.3	5.1	1	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I29	B	1	67	56.9	50.8	6.1	1	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I36	B	1	67	50.7	48.4	2.3	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I37	B	1	67	46.1	44.5	1.6	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I38	B	1	67	44.4	43.1	1.3	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I39	B	1	67	44.1	43.1	1	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I40	B	1	67	43.9	42.8	1.1	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I41	B	3	67	41.1	40.3	0.8	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I43	B	3	67	42.1	41.4	0.7	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I45	B	1	67	42.6	41.7	0.9	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	TI24	C	1	67	62.9	62.9	0	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	TI25	C	1	67	62.8	55	7.8	1	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	TI26	C	1	67	62.8	50	12.8	1	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	TI27	C	1	67	62.8	51.6	11.2	1	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	TI28	C	1	67	62.8	53	9.8	1	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30A	C	1	67	56.3	56.3	0	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30B	C	1	67	55.5	55.4	0.1	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30C	C	1	67	53.7	53.5	0.2	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30D	C	1	67	52.8	52.4	0.4	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30E	C	1	67	51.7	51.3	0.4	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30F	C	1	67	51.3	50.8	0.5	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30G	C	1	67	51.3	50.8	0.5	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30H	C	1	67	51.3	50.9	0.4	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30I	C	1	67	51.3	50.8	0.5	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30J	C	1	67	51.3	50.9	0.4	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30K	C	1	67	51.4	51	0.4	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct
Wall TI-2	I30L	C	1	67	51.6	51.1	0.5	0	6	Yes	Yes	8	895	7160	$ 257,760.00	$ 42,960.00	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
6ft height																	
Wall TI-2	I27	G	1	-	55.1	54.3	0.8	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I28	B	1	67	55.4	51.3	4.1	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I29	B	1	67	56.9	51.2	5.7	1	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I36	B	1	67	50.7	48.5	2.2	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I37	B	1	67	46.1	44.6	1.5	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I38	B	1	67	44.4	43.2	1.2	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I39	B	1	67	44.1	43.2	0.9	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I40	B	1	67	43.9	42.9	1	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I41	B	3	67	41.1	40.4	0.7	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I43	B	3	67	42.1	41.5	0.6	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I45	B	1	67	42.6	41.8	0.8	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	TI24	C	1	67	62.9	62.9	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	TI25	C	1	67	62.8	56.1	6.7	1	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	TI26	C	1	67	62.8	52.8	10	1	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	TI27	C	1	67	62.8	56.9	5.9	1	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	TI28	C	1	67	62.8	58	4.8	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30A	C	1	67	56.3	56.3	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30B	C	1	67	55.5	55.5	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30C	C	1	67	53.7	53.7	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30D	C	1	67	52.8	52.8	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30E	C	1	67	51.7	51.7	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30F	C	1	67	51.3	51.3	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30G	C	1	67	51.3	51.3	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30H	C	1	67	51.3	51.3	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30I	C	1	67	51.3	51.3	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30J	C	1	67	51.3	51.3	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30K	C	1	67	51.4	51.4	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct
Wall TI-2	I30L	C	1	67	51.6	51.6	0	0	4	Yes	Yes	6	895	5370	$ 193,320.00	$ 48,330.00	Propose to Construct

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-7: Wall TI3 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TI-3	I10	G	14	-	55.4	48	7.4	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I11	B	1	67	54.8	45.3	9.5	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I12	B	1	67	55.7	45.7	10	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I13	B	1	67	54	48.1	5.9	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I14	B	1	67	50.1	45.7	4.4	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I15	B	1	67	43.5	41.1	2.4	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I17	B	1	67	47.9	43.7	4.2	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I18	B	1	67	48.1	43.8	4.3	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I19	G	1	-	49	45.4	3.6	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I20	B	1	67	46.2	41.9	4.3	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I22	B	1	67	45.3	42.4	2.9	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I23	G	1	67	44.3	40.5	3.8	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I24	B	1	67	43.3	40.4	2.9	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I25	G	1	-	43.8	41.6	2.2	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	I26	B	1	67	51.5	49	2.5	0	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	TI20	C	1	67	62.9	45.5	17.4	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	TI21	C	1	67	63.6	44.9	18.7	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	TI22	C	1	67	63.6	45.7	17.9	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
Wall TI-3	TI23	C	1	67	63.5	47.1	16.4	1	7	Yes	Yes	20	985	19700	$ 709,200.00	$ 101,314.29	Not Cost Effective
15ft height																	
Wall TI-3	I10	G	14	-	55.4	48.4	7	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I11	B	1	67	54.8	46.1	8.7	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I12	B	1	67	55.7	46.5	9.2	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I13	B	1	67	54	48.3	5.7	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I14	B	1	67	50.1	45.9	4.2	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I15	B	1	67	43.5	41.2	2.3	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I17	B	1	67	47.9	43.8	4.1	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I18	B	1	67	48.1	43.9	4.2	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I19	G	1	-	49	45.5	3.5	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I20	B	1	67	46.2	42.1	4.1	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I22	B	1	67	45.3	42.5	2.8	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I23	G	1	67	44.3	40.7	3.6	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I24	B	1	67	43.3	40.5	2.8	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I25	G	1	-	43.8	41.7	2.1	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	I26	B	1	67	51.5	49.1	2.4	0	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	TI20	C	1	67	62.9	47.1	15.8	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	TI21	C	1	67	63.6	47.1	16.5	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	TI22	C	1	67	63.6	47.8	15.8	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct
Wall TI-3	TI23	C	1	67	63.5	48.5	15	1	7	Yes	Yes	15	985	14775	$ 531,900.00	$ 75,985.71	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
10ft height																	
Wall TI-3	I10	G	14	-	55.4	49.3	6.1	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I11	B	1	67	54.8	47.7	7.1	1	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I12	B	1	67	55.7	48.2	7.5	1	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I13	B	1	67	54	49.8	4.2	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I14	B	1	67	50.1	47.8	2.3	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I15	B	1	67	43.5	42.5	1	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I17	B	1	67	47.9	45.6	2.3	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I18	B	1	67	48.1	45.7	2.4	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I19	G	1	-	49	46.8	2.2	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I20	B	1	67	46.2	44.3	1.9	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I22	B	1	67	45.3	43.9	1.4	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I23	G	1	67	44.3	42.7	1.6	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I24	B	1	67	43.3	42.1	1.2	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I25	G	1	-	43.8	42.9	0.9	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	I26	B	1	67	51.5	50	1.5	0	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	TI20	C	1	67	62.9	50	12.9	1	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	TI21	C	1	67	63.6	50.3	13.3	1	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	TI22	C	1	67	63.6	50.8	12.8	1	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
Wall TI-3	TI23	C	1	67	63.5	51	12.5	1	6	Yes	Yes	10	985	9850	$ 354,600.00	$ 59,100.00	Propose to Construct
8ft height																	
Wall TI-3	I10	G	14	-	55.4	50	5.4	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I11	B	1	67	54.8	49.4	5.4	1	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I12	B	1	67	55.7	49.5	6.2	1	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I13	B	1	67	54	50.7	3.3	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I14	B	1	67	50.1	47.9	2.2	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I15	B	1	67	43.5	42.5	1	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I17	B	1	67	47.9	45.7	2.2	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I18	B	1	67	48.1	45.8	2.3	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I19	G	1	-	49	47	2	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I20	B	1	67	46.2	44.4	1.8	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I22	B	1	67	45.3	44	1.3	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I23	G	1	67	44.3	42.8	1.5	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I24	B	1	67	43.3	42.2	1.1	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I25	G	1	-	43.8	43	0.8	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	I26	B	1	67	51.5	50.1	1.4	0	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	TI20	C	1	67	62.9	52.2	10.7	1	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	TI21	C	1	67	63.6	52.8	10.8	1	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	TI22	C	1	67	63.6	53.2	10.4	1	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct
Wall TI-3	TI23	C	1	67	63.5	53.2	10.3	1	6	Yes	Yes	8	985	7880	$ 283,680.00	$ 47,280.00	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
6ft height																	
Wall TI-3	I10	G	14	-	55.4	52.4	3	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I11	B	1	67	54.8	52.1	2.7	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I12	B	1	67	55.7	53	2.7	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I13	B	1	67	54	50.9	3.1	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I14	B	1	67	50.1	48	2.1	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I15	B	1	67	43.5	42.6	0.9	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I17	B	1	67	47.9	45.8	2.1	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I18	B	1	67	48.1	45.9	2.2	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I19	G	1	-	49	47.1	1.9	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I20	B	1	67	46.2	44.6	1.6	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I22	B	1	67	45.3	44.1	1.2	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I23	G	1	67	44.3	43	1.3	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I24	B	1	67	43.3	42.4	0.9	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I25	G	1	-	43.8	43.2	0.6	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	I26	B	1	67	51.5	50.2	1.3	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	TI20	C	1	67	62.9	57.4	5.5	1	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	TI21	C	1	67	63.6	58.5	5.1	1	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	TI22	C	1	67	63.6	58.8	4.8	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TI-3	TI23	C	1	67	63.5	58.7	4.8	0	2	Yes	No	6	985	5910	$ 212,760.00	N/A	Does Not Meet Noise Reduction Design Goal

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-8: Wall TI4 - Summary

													Noise Level Comparison					
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)		Cost Per Benefited Receptor		Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier												
20ft height																		
Wall TI-4	I5	G	1	-	47.2	46.7	0.5	0	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	I6	G	1	-	48.9	48.5	0.4	0	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	I7	G	3	-	50.9	50	0.9	0	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	I8	G	1	-	56.2	55.7	0.5	0	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	I9	G	10	-	56.8	49	7.8	0	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	TI16	C	1	67	63	49.8	13.2	1	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	TI17	C	1	67	62.9	45.7	17.2	1	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
Wall TI-4	TI18	C	1	67	62.9	57.7	5.2	1	3	Yes	Yes	20	630	12600	$	453,600.00	$	151,200.00	Not Cost Effective
15ft height																		
Wall TI-4	I5	G	1	-	47.2	46.7	0.5	0	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	I6	G	1	-	48.9	48.5	0.4	0	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	I7	G	3	-	50.9	50	0.9	0	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	I8	G	1	-	56.2	55.7	0.5	0	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	I9	G	10	-	56.8	49.5	7.3	0	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	TI16	C	1	67	63	50.4	12.6	1	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	TI17	C	1	67	62.9	46.9	16	1	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
Wall TI-4	TI18	C	1	67	62.9	57.8	5.1	1	3	Yes	Yes	15	630	9450	$	340,200.00	$	113,400.00	Not Cost Effective
10ft height																		
Wall TI-4	I5	G	1	-	47.2	46.9	0.3	0	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	I6	G	1	-	48.9	48.6	0.3	0	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	I7	G	3	-	50.9	50.2	0.7	0	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	I8	G	1	-	56.2	55.8	0.4	0	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	I9	G	10	-	56.8	52	4.8	0	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	TI16	C	1	67	63	51.9	11.1	1	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	TI17	C	1	67	62.9	49.3	13.6	1	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
Wall TI-4	TI18	C	1	67	62.9	58	4.9	0	2	Yes	Yes	10	630	6300	$	226,800.00	$	113,400.00	Not Cost Effective
8ft height																		
Wall TI-4	I5	G	1	-	47.2	46.9	0.3	0	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	I6	G	1	-	48.9	48.7	0.2	0	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	I7	G	3	-	50.9	50.3	0.6	0	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	I8	G	1	-	56.2	55.8	0.4	0	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	I9	G	10	-	56.8	52.3	4.5	0	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	TI16	C	1	67	63	53.3	9.7	1	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	TI17	C	1	67	62.9	50.5	12.4	1	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
Wall TI-4	TI18	C	1	67	62.9	58.2	4.7	0	2	Yes	Yes	8	630	5040	$	181,440.00	$	90,720.00	Not Cost Effective
6ft height																		
Wall TI-4	I5	G	1	-	47.2	46.9	0.3	0	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	I6	G	1	-	48.9	48.7	0.2	0	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	I7	G	3	-	50.9	50.3	0.6	0	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	I8	G	1	-	56.2	55.8	0.4	0	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	I9	G	10	-	56.8	52.6	4.2	0	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	TI16	C	1	67	63	57.5	5.5	1	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	TI17	C	1	67	62.9	52.8	10.1	1	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct
Wall TI-4	TI18	C	1	67	62.9	59.3	3.6	0	2	Yes	Yes	6	630	3780	$	136,080.00	$	68,040.00	Propose to Construct

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-9: Wall TI5 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TI-5	TI1	C	1	67	66.3	50.3	16	1	2	Yes	Yes	20	470	9400	$ 338,400.00	$ 169,200.00	Not Cost Effective
Wall TI-5	TI2	C	1	67	66.3	48	18.3	1	2	Yes	Yes	20	470	9400	$ 338,400.00	$ 169,200.00	Not Cost Effective
Wall TI-5	TI3	G	1	67	66.4	66.4	0	0	2	Yes	Yes	20	470	9400	$ 338,400.00	$ 169,200.00	Not Cost Effective
15ft height																	
Wall TI-5	TI1	C	1	67	66.3	51	15.3	1	2	Yes	Yes	15	470	7050	$ 253,800.00	$ 126,900.00	Not Cost Effective
Wall TI-5	TI2	C	1	67	66.3	49.3	17	1	2	Yes	Yes	15	470	7050	$ 253,800.00	$ 126,900.00	Not Cost Effective
Wall TI-5	TI3	G	1	67	66.4	66.4	0	0	2	Yes	Yes	15	470	7050	$ 253,800.00	$ 126,900.00	Not Cost Effective
10ft height																	
Wall TI-5	TI1	C	1	67	66.3	52.9	13.4	1	2	Yes	Yes	10	470	4700	$ 169,200.00	$ 84,600.00	Not Cost Effective
Wall TI-5	TI2	C	1	67	66.3	52.2	14.1	1	2	Yes	Yes	10	470	4700	$ 169,200.00	$ 84,600.00	Not Cost Effective
Wall TI-5	TI3	G	1	67	66.4	66.4	0	0	2	Yes	Yes	10	470	4700	$ 169,200.00	$ 84,600.00	Not Cost Effective
8ft height																	
Wall TI-5	TI1	C	1	67	66.3	54.7	11.6	1	2	Yes	Yes	8	470	3760	$ 135,360.00	$ 67,680.00	Propose to Construct
Wall TI-5	TI2	C	1	67	66.3	54.1	12.2	1	2	Yes	Yes	8	470	3760	$ 135,360.00	$ 67,680.00	Propose to Construct
Wall TI-5	TI3	G	1	67	66.4	66.4	0	0	2	Yes	Yes	8	470	3760	$ 135,360.00	$ 67,680.00	Propose to Construct
6ft height																	
Wall TI-5	TI1	C	1	67	66.3	58.1	8.2	1	2	Yes	Yes	6	470	2820	$ 101,520.00	$ 50,760.00	Propose to Construct
Wall TI-5	TI2	C	1	67	66.3	57.5	8.8	1	2	Yes	Yes	6	470	2820	$ 101,520.00	$ 50,760.00	Propose to Construct
Wall TI-5	TI3	G	1	67	66.4	66.4	0	0	2	Yes	Yes	6	470	2820	$ 101,520.00	$ 50,760.00	Propose to Construct

Table B-10: Wall TJ - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TJ	JA7	C	1	67	39.9	39.2	0.7	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA13	C	1	67	57.3	57.3	0	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA14	C	1	67	49.8	49.7	0.1	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA15	C	1	67	47.4	47.3	0.1	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA16	C	1	67	46	45.8	0.2	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA17	C	1	67	41.6	41.5	0.1	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA18	C	1	67	39.2	39	0.2	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA19	C	1	67	38.5	37.3	1.2	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA20	C	1	67	37.6	36.6	1	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA21	C	1	67	37.5	36.8	0.7	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	JA22	C	1	67	36.4	36.1	0.3	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ1	C	1	67	63.4	63.4	0	0	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ2	C	1	67	62.7	48.2	14.5	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ3	C	1	67	63.3	45.8	17.5	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ4	C	1	67	63.6	44.8	18.8	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ5	C	1	67	64.7	44.9	19.8	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ6	C	1	67	64.6	45.9	18.7	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ7	C	1	67	65	46.9	18.1	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
Wall TJ	TJ8	C	1	67	65.2	51.2	14	1	7	Yes	Yes	20	1725	34500	$ 1,242,000.00	$ 177,428.57	Not Cost Effective
15ft height																	
Wall TJ	JA7	C	1	67	39.9	39.4	0.5	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA13	C	1	67	57.3	57.3	0	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA14	C	1	67	49.8	49.8	0	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA15	C	1	67	47.4	47.3	0.1	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA16	C	1	67	46	45.9	0.1	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA17	C	1	67	41.6	41.6	0	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA18	C	1	67	39.2	39.2	0	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA19	C	1	67	38.5	37.5	1	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA20	C	1	67	37.6	36.8	0.8	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA21	C	1	67	37.5	37	0.5	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	JA22	C	1	67	36.4	36.2	0.2	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ1	C	1	67	63.4	63.4	0	0	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TJ	TJ2	C	1	67	62.7	49.2	13.5	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ3	C	1	67	63.3	47.4	15.9	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ4	C	1	67	63.6	46.8	16.8	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ5	C	1	67	64.7	47.1	17.6	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ6	C	1	67	64.6	47.7	16.9	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ7	C	1	67	65	48.5	16.5	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
Wall TJ	TJ8	C	1	67	65.2	51.8	13.4	1	7	Yes	Yes	15	1725	25875	$ 931,500.00	$ 133,071.43	Not Cost Effective
10ft height																	
Wall TJ	JA7	C	1	67	39.9	39.7	0.2	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA13	C	1	67	57.3	57.3	0	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA14	C	1	67	49.8	49.8	0	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA15	C	1	67	47.4	47.4	0	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA16	C	1	67	46	46.1	-0.1	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA17	C	1	67	41.6	41.7	-0.1	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA18	C	1	67	39.2	39.2	0	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA19	C	1	67	38.5	37.8	0.7	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA20	C	1	67	37.6	37.1	0.5	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA21	C	1	67	37.5	37.2	0.3	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	JA22	C	1	67	36.4	36.3	0.1	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ1	C	1	67	63.4	63.4	0	0	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ2	C	1	67	62.7	51	11.7	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ3	C	1	67	63.3	50.2	13.1	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ4	C	1	67	63.6	50	13.6	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ5	C	1	67	64.7	50.3	14.4	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ6	C	1	67	64.6	50.6	14	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ7	C	1	67	65	51.1	13.9	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
Wall TJ	TJ8	C	1	67	65.2	53.2	12	1	7	Yes	Yes	10	1725	17250	$ 621,000.00	$ 88,714.29	Not Cost Effective
8ft height																	
Wall TJ	JA7	C	1	67	39.9	39.7	0.2	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA13	C	1	67	57.3	57.3	0	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA14	C	1	67	49.8	49.8	0	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA15	C	1	67	47.4	47.4	0	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA16	C	1	67	46	46.1	-0.1	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA17	C	1	67	41.6	41.7	-0.1	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA18	C	1	67	39.2	39.2	0	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA19	C	1	67	38.5	37.9	0.6	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA20	C	1	67	37.6	37.1	0.5	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA21	C	1	67	37.5	37.2	0.3	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	JA22	C	1	67	36.4	36.3	0.1	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ1	C	1	67	63.4	63.4	0	0	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ2	C	1	67	62.7	52.6	10.1	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ3	C	1	67	63.3	52.3	11	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ4	C	1	67	63.6	52.2	11.4	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ5	C	1	67	64.7	52.3	12.4	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ6	C	1	67	64.6	52.9	11.7	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ7	C	1	67	65	53.2	11.8	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
Wall TJ	TJ8	C	1	67	65.2	53.9	11.3	1	7	Yes	Yes	8	1725	13800	$ 496,800.00	$ 70,971.43	Propose to Construct
6ft height																	
Wall TJ	JA7	C	1	67	39.9	39.9	0	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA13	C	1	67	57.3	57.3	0	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA14	C	1	67	49.8	49.8	0	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA15	C	1	67	47.4	47.4	0	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA16	C	1	67	46	46.1	-0.1	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA17	C	1	67	41.6	41.7	-0.1	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA18	C	1	67	39.2	39.3	-0.1	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA19	C	1	67	38.5	38.2	0.3	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA20	C	1	67	37.6	37.4	0.2	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA21	C	1	67	37.5	37.3	0.2	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	JA22	C	1	67	36.4	36.4	0	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ1	C	1	67	63.4	63.4	0	0	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ2	C	1	67	62.7	56	6.7	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ3	C	1	67	63.3	56.3	7	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ4	C	1	67	63.6	56.3	7.3	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ5	C	1	67	64.7	56.9	7.8	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ6	C	1	67	64.6	57	7.6	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct
Wall TJ	TJ7	C	1	67	65	57.5	7.5	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct

													Noise Level Comparison					
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
Wall TJ	TJ8	C	1	67	65.2	58	7.2	1	7	Yes	Yes	6	1725	10350	$ 372,600.00	$ 53,228.57	Propose to Construct	

Table B-11: Wall KA - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall KA	K150	B	1	67	57.3	53.8	3.5	0	0	No	No	20	340	6800	244800	N/A	Does Not Meet Noise Reduction Design Goal
15ft height																	
Wall KA	K150	B	1	67	57.3	54.1	3.2	0	0	No	No	15	340	5100	183600	N/A	Does Not Meet Noise Reduction Design Goal
10ft height																	
Wall KA	K150	B	1	67	57.3	55	2.3	0	0	No	No	10	340	3400	122400	N/A	Does Not Meet Noise Reduction Design Goal
8ft height																	
Wall KA	K150	B	1	67	57.3	55.1	2.2	0	0	No	No	8	340	2720	97920	N/A	Does Not Meet Noise Reduction Design Goal
6ft height																	
Wall KA	K150	B	1	67	57.3	55.4	1.9	0	0	No	No	6	340	2040	73440	N/A	Does Not Meet Noise Reduction Design Goal

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-12: Wall TK - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TK	K1	B	1	67	60	63.9	-3.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K2	B	1	67	57.9	44.5	13.4	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K3	B	1	67	52.3	43.2	9.1	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K4	B	1	67	54.6	46	8.6	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K5	B	1	67	54.8	46	8.8	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K6	B	1	67	50.4	43	7.4	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K7	B	1	67	52.1	45.7	6.4	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K8	B	1	67	49.6	44.2	5.4	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K9	B	1	67	60.6	52.4	8.2	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K10	B	1	67	52.3	43.4	8.9	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K11	B	1	67	60.4	47.3	13.1	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K12	G	1	67	58.6	44.3	14.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K13	B	1	67	58.8	43.9	14.9	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K14	B	1	67	58.7	43.1	15.6	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K15	B	1	67	58.8	42.7	16.1	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K16	B	1	67	58.5	42.5	16	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K17	B	1	67	57.8	41.5	16.3	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K18	B	1	67	54.9	40.9	14	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K19	B	1	67	55	41.1	13.9	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K20	B	1	67	52.2	37.7	14.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K21	B	1	67	62	61.5	0.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K22	B	1	67	61.1	60.8	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K23	B	1	67	44.4	44	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K24	B	1	67	41.2	40.7	0.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K25	B	1	67	44.9	43.3	1.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K26	B	1	67	44.8	41.7	3.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K27	B	1	67	46.9	43.5	3.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K28	B	1	67	48.3	43.9	4.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K29	B	1	67	48.7	42.5	6.2	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K30	B	1	67	35.1	34.3	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K31	B	1	67	39.9	38.4	1.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K32	B	1	67	45.2	42.9	2.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K33	B	1	67	45.3	40.5	4.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K34	B	1	67	47.5	43.3	4.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K35	B	1	67	49.6	37.3	12.3	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K36	B	1	67	49.1	37.1	12	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K37	B	1	67	62.4	62.1	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K38	B	1	67	62.3	62	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K39	B	1	67	62.1	62	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K40	B	1	67	62.8	62.6	0.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K41	B	1	67	43.9	43.2	0.7	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K42	B	1	67	43.4	42.7	0.7	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K43	B	1	67	43.7	41.6	2.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K44	B	1	67	46.5	44.1	2.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K45	B	1	67	44.5	42.9	1.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K46	B	1	67	46.9	43.4	3.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K47	B	1	67	45.6	43.4	2.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K48	B	1	67	45.3	41.3	4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K49	B	1	67	43.7	41.2	2.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K50	B	1	67	40.4	38.9	1.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K51	B	1	67	41.6	39.7	1.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K52	B	1	67	40.7	38.7	2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K53	B	1	67	44.4	38.3	6.1	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K54	B	1	67	41.2	36.2	5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K55	B	1	67	39.9	36.7	3.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K56	B	1	67	41	37	4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K57	B	1	67	48	37.3	10.7	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K58	B	1	67	45.9	37.4	8.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K59	B	1	67	46.4	35.9	10.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K60	B	1	67	46.5	35.7	10.8	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K61	B	1	67	45.9	35.6	10.3	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K62	B	1	67	63.2	62.2	1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K63	B	1	67	63.2	62.2	1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K64	B	1	67	63.1	62.2	0.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K65	B	1	67	63.1	62.1	1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K66	B	1	67	63	62.2	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K67	B	1	67	63	62.1	0.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K68	B	1	67	61.4	61.4	0	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K69	B	1	67	62	61.6	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K70	B	1	67	59.5	59.4	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K71	B	1	67	60.3	60.1	0.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K72	B	1	67	43.3	42.5	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K73	B	1	67	43	42	1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K74	B	1	67	43.1	42.3	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K75	B	1	67	44.1	43.6	0.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K76	B	1	67	46	45.7	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K77	B	1	67	49.1	49	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K78	B	1	67	43.2	42.7	0.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K79	B	1	67	43.9	43.5	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K80	B	1	67	44.1	43.7	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K81	B	1	67	45	44.7	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K82	B	1	67	45.8	45.6	0.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K83	B	1	67	49.4	49.3	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K84	B	1	67	42.5	41	1.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K85	B	1	67	42.8	41.7	1.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K86	B	1	67	42.8	42.1	0.7	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K87	B	1	67	43	42.5	0.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K88	B	1	67	44.1	43.7	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K89	B	1	67	46.5	46.3	0.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K90	B	1	67	43.7	42.7	1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K91	B	1	67	44.7	44.2	0.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K92	B	1	67	46.7	46.4	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K93	B	1	67	45	44.6	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K94	B	1	67	45.4	45.1	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K95	B	1	67	47.9	47.8	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K96	B	1	67	44.9	42.9	2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K97	B	1	67	44.4	43	1.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K98	B	1	67	44.1	43.2	0.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K99	B	1	67	44.3	43.9	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K100	B	1	67	45.5	45.2	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K101	B	1	67	50.7	50.6	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K102	B	1	67	43.3	40.9	2.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K103	B	1	67	43	41.1	1.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K104	B	1	67	42.7	41.4	1.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K105	B	1	67	43.2	42.5	0.7	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K106	B	1	67	44.8	44.4	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K107	B	1	67	49	48.9	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K108	B	1	67	40	37.6	2.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K109	B	1	67	40	38	2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K110	B	1	67	39.7	38.5	1.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K111	B	1	67	40.6	39.8	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K112	B	1	67	42.9	42.6	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K113	B	1	67	49.3	49.2	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K114	B	1	67	39.8	37.9	1.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K115	B	1	67	40.1	38.6	1.5	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K116	B	1	67	40.6	39.4	1.2	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K117	B	1	67	42.4	41.6	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K118	B	1	67	44.8	44.5	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K119	B	1	67	48.8	48.7	0.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K120	B	1	67	41.1	38.3	2.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K121	B	1	67	41.4	38.6	2.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K122	B	1	67	41.5	38.9	2.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K123	B	1	67	41.5	39.9	1.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K124	B	1	67	42.5	41.5	1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K125	B	1	67	46.4	46	0.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K126	B	1	67	41.6	39.5	2.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K127	B	1	67	41.9	38.3	3.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K128	B	1	67	40.4	38.1	2.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K129	B	1	67	41.1	39.5	1.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct

														Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
Wall TK	K130	B	1	67	43.3	42.6	0.7	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K131	B	1	67	47.5	47.2	0.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K132	B	1	67	44.3	37.5	6.8	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K133	B	1	67	43.1	37.1	6	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K134	B	1	67	41.4	36.1	5.3	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K135	B	1	67	41.8	38	3.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K136	B	1	67	41.9	39.5	2.4	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K137	B	1	67	45.2	44.4	0.8	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K138	B	1	67	44.2	35.5	8.7	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K139	B	1	67	42	35.4	6.6	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K140	B	1	67	41.2	37.3	3.9	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K141	B	1	67	41.5	39.2	2.3	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K142	B	1	67	43.8	42.7	1.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K143	B	1	67	43	34.8	8.2	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K144	B	1	67	40.3	34.8	5.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K145	B	1	67	39.7	35.1	4.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K146	B	1	67	39.3	35.2	4.1	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	K150	B	1	67	57.3	56.7	0.6	0	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK1	C	1	67	64.8	58.3	6.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK2	C	1	67	64.1	47.8	16.3	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK3	C	1	67	63.9	46.2	17.7	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK4	C	1	67	64	57.8	6.2	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK5	C	1	67	64	47	17	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK6	C	1	67	64.2	45.4	18.8	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK7	C	1	67	64.2	45.5	18.7	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK8	C	1	67	63.9	45.1	18.8	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK9	C	1	67	63.8	45.1	18.7	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK10	C	1	67	65.6	45.4	20.2	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK11	C	1	67	66	44.6	21.4	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK12	C	1	67	65.6	45.1	20.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK13	C	1	67	65.6	44.7	20.9	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK14	C	1	67	65.6	44.5	21.1	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK15	C	1	67	65.6	44.8	20.8	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK16	C	1	67	65.7	45.2	20.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK17	C	1	67	65.7	45.2	20.5	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK18	C	1	67	65.5	45.6	19.9	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK19	C	1	67	65.1	45.5	19.6	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK20	C	1	67	64.8	46.8	18	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct
Wall TK	TK21	C	1	67	64.9	52	12.9	1	56	Yes	Yes	20	4705	94100	$ 3,387,600.00	$ 60,492.86	Propose to Construct

														Noise Level Comparison			
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria		
15ft height																	
Wall TK	K1	B	1	67	60	64.1	-4.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K2	B	1	67	57.9	47.8	10.1	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K3	B	1	67	52.3	44.9	7.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K4	B	1	67	54.6	47.7	6.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K5	B	1	67	54.8	47.4	7.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K6	B	1	67	50.4	43.9	6.5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K7	B	1	67	52.1	46.2	5.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K8	B	1	67	49.6	44.8	4.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K9	B	1	67	60.6	52.6	8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K10	B	1	67	52.3	43.9	8.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K11	B	1	67	60.4	48	12.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K12	G	1	67	58.6	45.2	13.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K13	B	1	67	58.8	44.9	13.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K14	B	1	67	58.7	44.4	14.3	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K15	B	1	67	58.8	44.1	14.7	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K16	B	1	67	58.5	43.7	14.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K17	B	1	67	57.8	43	14.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K18	B	1	67	54.9	42.5	12.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K19	B	1	67	55	42.6	12.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K20	B	1	67	52.2	39.3	12.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K21	B	1	67	62	61.5	0.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K22	B	1	67	61.1	60.8	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K23	B	1	67	44.4	44.1	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K24	B	1	67	41.2	40.9	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K25	B	1	67	44.9	43.5	1.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K26	B	1	67	44.8	41.9	2.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K27	B	1	67	46.9	43.8	3.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K28	B	1	67	48.3	44.1	4.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K29	B	1	67	48.7	42.9	5.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K30	B	1	67	35.1	34.5	0.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K31	B	1	67	39.9	38.5	1.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K32	B	1	67	45.2	43	2.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K33	B	1	67	45.3	40.6	4.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K34	B	1	67	47.5	43.5	4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K35	B	1	67	49.6	38.3	11.3	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K36	B	1	67	49.1	38.2	10.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K37	B	1	67	62.4	62.1	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K38	B	1	67	62.3	62	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K39	B	1	67	62.1	62	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K40	B	1	67	62.8	62.6	0.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K41	B	1	67	43.9	43.4	0.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K42	B	1	67	43.4	42.8	0.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K43	B	1	67	43.7	41.7	2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K44	B	1	67	46.5	44.3	2.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K45	B	1	67	44.5	43	1.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K46	B	1	67	46.9	43.5	3.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K47	B	1	67	45.6	43.5	2.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K48	B	1	67	45.3	41.6	3.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K49	B	1	67	43.7	41.3	2.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K50	B	1	67	40.4	39.2	1.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K51	B	1	67	41.6	39.9	1.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K52	B	1	67	40.7	38.8	1.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K53	B	1	67	44.4	38.6	5.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K54	B	1	67	41.2	36.5	4.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K55	B	1	67	39.9	36.7	3.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K56	B	1	67	41	37.2	3.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K57	B	1	67	48	38	10	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K58	B	1	67	45.9	37.9	8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K59	B	1	67	46.4	36.8	9.6	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K60	B	1	67	46.5	36.6	9.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K61	B	1	67	45.9	36.4	9.5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K62	B	1	67	63.2	62.2	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K63	B	1	67	63.2	62.2	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K64	B	1	67	63.1	62.2	0.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K65	B	1	67	63.1	62.1	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct

														Noise Level Comparison				
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K66	B	1	67	63	62.2	0.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K67	B	1	67	63	62.1	0.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K68	B	1	67	61.4	61.4	0	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K69	B	1	67	62	61.6	0.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K70	B	1	67	59.5	59.4	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K71	B	1	67	60.3	60.1	0.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K72	B	1	67	43.3	42.8	0.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K73	B	1	67	43	42.3	0.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K74	B	1	67	43.1	42.5	0.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K75	B	1	67	44.1	43.7	0.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K76	B	1	67	46	45.8	0.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K77	B	1	67	49.1	49.1	0	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K78	B	1	67	43.2	42.8	0.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K79	B	1	67	43.9	43.6	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K80	B	1	67	44.1	43.8	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K81	B	1	67	45	44.8	0.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K82	B	1	67	45.8	45.6	0.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K83	B	1	67	49.4	49.3	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K84	B	1	67	42.5	41.1	1.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K85	B	1	67	42.8	41.8	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K86	B	1	67	42.8	42.1	0.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K87	B	1	67	43	42.5	0.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K88	B	1	67	44.1	43.7	0.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K89	B	1	67	46.5	46.4	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K90	B	1	67	43.7	42.7	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K91	B	1	67	44.7	44.2	0.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K92	B	1	67	46.7	46.4	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K93	B	1	67	45	44.7	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K94	B	1	67	45.4	45.1	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K95	B	1	67	47.9	47.9	0	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K96	B	1	67	44.9	43	1.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K97	B	1	67	44.4	43	1.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K98	B	1	67	44.1	43.2	0.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K99	B	1	67	44.3	43.9	0.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K100	B	1	67	45.5	45.2	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K101	B	1	67	50.7	50.6	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K102	B	1	67	43.3	41	2.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K103	B	1	67	43	41.1	1.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K104	B	1	67	42.7	41.5	1.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K105	B	1	67	43.2	42.5	0.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K106	B	1	67	44.8	44.4	0.4	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	
Wall TK	K107	B	1	67	49	48.9	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct	

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K108	B	1	67	40	37.7	2.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K109	B	1	67	40	38	2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K110	B	1	67	39.7	38.6	1.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K111	B	1	67	40.6	39.8	0.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K112	B	1	67	42.9	42.6	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K113	B	1	67	49.3	49.2	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K114	B	1	67	39.8	38	1.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K115	B	1	67	40.1	38.6	1.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K116	B	1	67	40.6	39.5	1.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K117	B	1	67	42.4	41.6	0.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K118	B	1	67	44.8	44.5	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K119	B	1	67	48.8	48.7	0.1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K120	B	1	67	41.1	38.4	2.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K121	B	1	67	41.4	38.7	2.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K122	B	1	67	41.5	39	2.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K123	B	1	67	41.5	39.9	1.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K124	B	1	67	42.5	41.5	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K125	B	1	67	46.4	46.1	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K126	B	1	67	41.6	39.7	1.9	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K127	B	1	67	41.9	38.4	3.5	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K128	B	1	67	40.4	38.1	2.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K129	B	1	67	41.1	39.5	1.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K130	B	1	67	43.3	42.6	0.7	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K131	B	1	67	47.5	47.2	0.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K132	B	1	67	44.3	37.9	6.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K133	B	1	67	43.1	37.4	5.7	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K134	B	1	67	41.4	36.3	5.1	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K135	B	1	67	41.8	38.2	3.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K136	B	1	67	41.9	39.6	2.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K137	B	1	67	45.2	44.4	0.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K138	B	1	67	44.2	36.1	8.1	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K139	B	1	67	42	35.8	6.2	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K140	B	1	67	41.2	37.4	3.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K141	B	1	67	41.5	39.3	2.2	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K142	B	1	67	43.8	42.8	1	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K143	B	1	67	43	35.5	7.5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K144	B	1	67	40.3	35.3	5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K145	B	1	67	39.7	35.4	4.3	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K146	B	1	67	39.3	35.5	3.8	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	K150	B	1	67	57.3	56.7	0.6	0	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK1	C	1	67	64.8	58.5	6.3	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK2	C	1	67	64.1	49.3	14.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK3	C	1	67	63.9	48.4	15.5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK4	C	1	67	64	58	6	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK5	C	1	67	64	49	15	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK6	C	1	67	64.2	48	16.2	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK7	C	1	67	64.2	48.2	16	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK8	C	1	67	63.9	48.1	15.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK9	C	1	67	63.8	48	15.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK10	C	1	67	65.6	47.9	17.7	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK11	C	1	67	66	47.6	18.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK12	C	1	67	65.6	47.9	17.7	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK13	C	1	67	65.6	47.5	18.1	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK14	C	1	67	65.6	47.5	18.1	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	TK15	C	1	67	65.6	47.5	18.1	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK16	C	1	67	65.7	47.8	17.9	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK17	C	1	67	65.7	47.9	17.8	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK18	C	1	67	65.5	48	17.5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK19	C	1	67	65.1	47.6	17.5	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK20	C	1	67	64.8	48.4	16.4	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
Wall TK	TK21	C	1	67	64.9	52.6	12.3	1	54	Yes	Yes	15	4705	70575	$ 2,540,700.00	$ 47,050.00	Propose to Construct
10ft height																	
Wall TK	K1	B	1	67	60	65	-5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K2	B	1	67	57.9	52	5.9	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K3	B	1	67	52.3	48.9	3.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K4	B	1	67	54.6	51.1	3.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K5	B	1	67	54.8	50.4	4.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K6	B	1	67	50.4	46.5	3.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K7	B	1	67	52.1	48	4.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K8	B	1	67	49.6	46.6	3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K9	B	1	67	60.6	53.7	6.9	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K10	B	1	67	52.3	45.8	6.5	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K11	B	1	67	60.4	50.9	9.5	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K12	G	1	67	58.6	48.7	9.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K13	B	1	67	58.8	48.7	10.1	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K14	B	1	67	58.7	48.5	10.2	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K15	B	1	67	58.8	48.4	10.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K16	B	1	67	58.5	47.9	10.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K17	B	1	67	57.8	45.8	12	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K18	B	1	67	54.9	45.1	9.8	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K19	B	1	67	55	45.2	9.8	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K20	B	1	67	52.2	44.5	7.7	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K21	B	1	67	62	61.6	0.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K22	B	1	67	61.1	60.8	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K23	B	1	67	44.4	44.2	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K24	B	1	67	41.2	41	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K25	B	1	67	44.9	43.9	1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K26	B	1	67	44.8	42.5	2.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K27	B	1	67	46.9	45	1.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K28	B	1	67	48.3	45	3.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K29	B	1	67	48.7	44.4	4.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K30	B	1	67	35.1	34.8	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K31	B	1	67	39.9	39	0.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K32	B	1	67	45.2	43.4	1.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K33	B	1	67	45.3	41.7	3.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K34	B	1	67	47.5	44.2	3.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K35	B	1	67	49.6	41.9	7.7	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K36	B	1	67	49.1	42.7	6.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K37	B	1	67	62.4	62.1	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K38	B	1	67	62.3	62	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K39	B	1	67	62.1	62	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K40	B	1	67	62.8	62.6	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K41	B	1	67	43.9	43.6	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K42	B	1	67	43.4	42.9	0.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K43	B	1	67	43.7	42.2	1.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K44	B	1	67	46.5	45	1.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K45	B	1	67	44.5	43.5	1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K46	B	1	67	46.9	44.3	2.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K47	B	1	67	45.6	44	1.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K48	B	1	67	45.3	42.6	2.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K49	B	1	67	43.7	41.9	1.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K50	B	1	67	40.4	39.7	0.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K51	B	1	67	41.6	40.3	1.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K52	B	1	67	40.7	39.3	1.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K53	B	1	67	44.4	40	4.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K54	B	1	67	41.2	37.9	3.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K55	B	1	67	39.9	37.6	2.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K56	B	1	67	41	38.3	2.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K57	B	1	67	48	40.9	7.1	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K58	B	1	67	45.9	40.1	5.8	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K59	B	1	67	46.4	40	6.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K60	B	1	67	46.5	39.9	6.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K61	B	1	67	45.9	39.6	6.3	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K62	B	1	67	63.2	62.2	1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K63	B	1	67	63.2	62.2	1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K64	B	1	67	63.1	62.2	0.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K65	B	1	67	63.1	62.1	1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K66	B	1	67	63	62.2	0.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K67	B	1	67	63	62.1	0.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K68	B	1	67	61.4	61.4	0	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K69	B	1	67	62	61.6	0.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K70	B	1	67	59.5	59.4	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K71	B	1	67	60.3	60.1	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K72	B	1	67	43.3	43	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K73	B	1	67	43	42.6	0.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K74	B	1	67	43.1	42.8	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K75	B	1	67	44.1	43.9	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K76	B	1	67	46	45.9	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K77	B	1	67	49.1	49.1	0	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K78	B	1	67	43.2	42.9	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K79	B	1	67	43.9	43.6	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K80	B	1	67	44.1	43.9	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K81	B	1	67	45	44.9	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K82	B	1	67	45.8	45.7	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K83	B	1	67	49.4	49.4	0	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K84	B	1	67	42.5	41.5	1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K85	B	1	67	42.8	42.1	0.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K86	B	1	67	42.8	42.3	0.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K87	B	1	67	43	42.6	0.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K88	B	1	67	44.1	43.8	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K89	B	1	67	46.5	46.4	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K90	B	1	67	43.7	43	0.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K91	B	1	67	44.7	44.4	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K92	B	1	67	46.7	46.5	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K93	B	1	67	45	44.7	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K94	B	1	67	45.4	45.2	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K95	B	1	67	47.9	47.9	0	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K96	B	1	67	44.9	43.3	1.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K97	B	1	67	44.4	43.2	1.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K98	B	1	67	44.1	43.4	0.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K99	B	1	67	44.3	44	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K100	B	1	67	45.5	45.2	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K101	B	1	67	50.7	50.6	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K102	B	1	67	43.3	41.5	1.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K103	B	1	67	43	41.5	1.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K104	B	1	67	42.7	41.8	0.9	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K105	B	1	67	43.2	42.7	0.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K106	B	1	67	44.8	44.5	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K107	B	1	67	49	48.9	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K108	B	1	67	40	38.3	1.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K109	B	1	67	40	38.4	1.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K110	B	1	67	39.7	38.9	0.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K111	B	1	67	40.6	40	0.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K112	B	1	67	42.9	42.7	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K113	B	1	67	49.3	49.2	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K114	B	1	67	39.8	38.5	1.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K115	B	1	67	40.1	39	1.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K116	B	1	67	40.6	39.8	0.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K117	B	1	67	42.4	41.8	0.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K118	B	1	67	44.8	44.6	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K119	B	1	67	48.8	48.7	0.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K120	B	1	67	41.1	39.1	2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K121	B	1	67	41.4	39.3	2.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K122	B	1	67	41.5	39.5	2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K123	B	1	67	41.5	40.3	1.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K124	B	1	67	42.5	41.7	0.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K125	B	1	67	46.4	46.1	0.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K126	B	1	67	41.6	40.2	1.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K127	B	1	67	41.9	39.2	2.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K128	B	1	67	40.4	38.7	1.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K129	B	1	67	41.1	39.9	1.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K130	B	1	67	43.3	42.7	0.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K131	B	1	67	47.5	47.3	0.2	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K132	B	1	67	44.3	39.5	4.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K133	B	1	67	43.1	39	4.1	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K134	B	1	67	41.4	37.7	3.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K135	B	1	67	41.8	39.1	2.7	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K136	B	1	67	41.9	40.1	1.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K137	B	1	67	45.2	44.6	0.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K138	B	1	67	44.2	38.8	5.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K139	B	1	67	42	37.6	4.4	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K140	B	1	67	41.2	38.4	2.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K141	B	1	67	41.5	39.9	1.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K142	B	1	67	43.8	43	0.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K143	B	1	67	43	38	5	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K144	B	1	67	40.3	37	3.3	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K145	B	1	67	39.7	36.9	2.8	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K146	B	1	67	39.3	36.8	2.5	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	K150	B	1	67	57.3	56.7	0.6	0	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK1	C	1	67	64.8	58.9	5.9	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK2	C	1	67	64.1	51.5	12.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK3	C	1	67	63.9	51.5	12.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK4	C	1	67	64	58.4	5.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK5	C	1	67	64	51.8	12.2	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK6	C	1	67	64.2	51.4	12.8	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK7	C	1	67	64.2	51.5	12.7	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK8	C	1	67	63.9	51.3	12.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK9	C	1	67	63.8	51.4	12.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK10	C	1	67	65.6	51.4	14.2	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK11	C	1	67	66	51.4	14.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK12	C	1	67	65.6	51.3	14.3	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK13	C	1	67	65.6	51.1	14.5	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK14	C	1	67	65.6	51	14.6	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK15	C	1	67	65.6	51.1	14.5	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK16	C	1	67	65.7	51.3	14.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK17	C	1	67	65.7	51.5	14.2	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK18	C	1	67	65.5	51.3	14.2	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK19	C	1	67	65.1	51.1	14	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK20	C	1	67	64.8	51.4	13.4	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct
Wall TK	TK21	C	1	67	64.9	53.9	11	1	42	Yes	Yes	10	4705	47050	$ 1,693,800.00	$ 40,328.57	Propose to Construct

														Noise Level Comparison		
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
8ft height																
Wall TK	K1	B	1	67	60	65.6	-5.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K2	B	1	67	57.9	52.6	5.3	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K3	B	1	67	52.3	49.4	2.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K4	B	1	67	54.6	51.5	3.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K5	B	1	67	54.8	50.9	3.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K6	B	1	67	50.4	46.8	3.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K7	B	1	67	52.1	48.4	3.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K8	B	1	67	49.6	46.9	2.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K9	B	1	67	60.6	53.9	6.7	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K10	B	1	67	52.3	46.1	6.2	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K11	B	1	67	60.4	51.4	9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K12	G	1	67	58.6	49.2	9.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K13	B	1	67	58.8	49.2	9.6	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K14	B	1	67	58.7	49	9.7	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K15	B	1	67	58.8	49	9.8	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K16	B	1	67	58.5	48.6	9.9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K17	B	1	67	57.8	48.3	9.5	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K18	B	1	67	54.9	48.4	6.5	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K19	B	1	67	55	48.2	6.8	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K20	B	1	67	52.2	45	7.2	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K21	B	1	67	62	61.6	0.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K22	B	1	67	61.1	60.9	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K23	B	1	67	44.4	44.2	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K24	B	1	67	41.2	41	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K25	B	1	67	44.9	44	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K26	B	1	67	44.8	42.7	2.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K27	B	1	67	46.9	45.3	1.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K28	B	1	67	48.3	45.2	3.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K29	B	1	67	48.7	44.6	4.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K30	B	1	67	35.1	35	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K31	B	1	67	39.9	39	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K32	B	1	67	45.2	43.5	1.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K33	B	1	67	45.3	41.9	3.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K34	B	1	67	47.5	44.3	3.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K35	B	1	67	49.6	42.4	7.2	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K36	B	1	67	49.1	43.2	5.9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K37	B	1	67	62.4	62.1	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K38	B	1	67	62.3	62	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K39	B	1	67	62.1	62	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K40	B	1	67	62.8	62.6	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K41	B	1	67	43.9	43.6	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K42	B	1	67	43.4	43	0.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K43	B	1	67	43.7	42.3	1.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K44	B	1	67	46.5	45.2	1.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K45	B	1	67	44.5	43.6	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K46	B	1	67	46.9	44.4	2.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K47	B	1	67	45.6	44.1	1.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K48	B	1	67	45.3	42.7	2.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K49	B	1	67	43.7	42	1.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K50	B	1	67	40.4	39.8	0.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K51	B	1	67	41.6	40.5	1.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K52	B	1	67	40.7	39.5	1.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K53	B	1	67	44.4	40.3	4.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K54	B	1	67	41.2	38.2	3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K55	B	1	67	39.9	37.8	2.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K56	B	1	67	41	38.5	2.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K57	B	1	67	48	41.3	6.7	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K58	B	1	67	45.9	40.5	5.4	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K59	B	1	67	46.4	40.5	5.9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K60	B	1	67	46.5	40.2	6.3	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K61	B	1	67	45.9	39.9	6	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K62	B	1	67	63.2	62.2	1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K63	B	1	67	63.2	62.2	1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K64	B	1	67	63.1	62.2	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K65	B	1	67	63.1	62.1	1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct

														Noise Level Comparison			
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria		
Wall TK	K66	B	1	67	63	62.2	0.8	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K67	B	1	67	63	62.1	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K68	B	1	67	61.4	61.4	0	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K69	B	1	67	62	61.6	0.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K70	B	1	67	59.5	59.4	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K71	B	1	67	60.3	60.1	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K72	B	1	67	43.3	43	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K73	B	1	67	43	42.7	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K74	B	1	67	43.1	42.9	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K75	B	1	67	44.1	43.9	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K76	B	1	67	46	45.9	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K77	B	1	67	49.1	49.1	0	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K78	B	1	67	43.2	42.9	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K79	B	1	67	43.9	43.7	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K80	B	1	67	44.1	43.9	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K81	B	1	67	45	45	0	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K82	B	1	67	45.8	45.8	0	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K83	B	1	67	49.4	49.3	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K84	B	1	67	42.5	41.6	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K85	B	1	67	42.8	42.1	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K86	B	1	67	42.8	42.3	0.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K87	B	1	67	43	42.7	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K88	B	1	67	44.1	43.8	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K89	B	1	67	46.5	46.4	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K90	B	1	67	43.7	43	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K91	B	1	67	44.7	44.4	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K92	B	1	67	46.7	46.5	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K93	B	1	67	45	44.8	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K94	B	1	67	45.4	45.2	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K95	B	1	67	47.9	47.9	0	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K96	B	1	67	44.9	43.4	1.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K97	B	1	67	44.4	43.4	1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K98	B	1	67	44.1	43.4	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K99	B	1	67	44.3	44	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K100	B	1	67	45.5	45.3	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K101	B	1	67	50.7	50.7	0	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K102	B	1	67	43.3	41.6	1.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K103	B	1	67	43	41.6	1.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K104	B	1	67	42.7	41.9	0.8	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K105	B	1	67	43.2	42.7	0.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K106	B	1	67	44.8	44.5	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K107	B	1	67	49	48.9	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K108	B	1	67	40	38.4	1.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K109	B	1	67	40	38.6	1.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K110	B	1	67	39.7	39	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K111	B	1	67	40.6	40.1	0.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K112	B	1	67	42.9	42.7	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K113	B	1	67	49.3	49.2	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K114	B	1	67	39.8	38.6	1.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K115	B	1	67	40.1	39.2	0.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K116	B	1	67	40.6	39.9	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K117	B	1	67	42.4	41.8	0.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K118	B	1	67	44.8	44.6	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K119	B	1	67	48.8	48.7	0.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K120	B	1	67	41.1	39.3	1.8	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K121	B	1	67	41.4	39.5	1.9	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K122	B	1	67	41.5	39.7	1.8	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K123	B	1	67	41.5	40.4	1.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K124	B	1	67	42.5	41.8	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K125	B	1	67	46.4	46.1	0.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K126	B	1	67	41.6	40.3	1.3	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K127	B	1	67	41.9	39.5	2.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K128	B	1	67	40.4	38.9	1.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K129	B	1	67	41.1	40	1.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K130	B	1	67	43.3	42.8	0.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K131	B	1	67	47.5	47.3	0.2	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct

												Noise Level Comparison				
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	K132	B	1	67	44.3	39.8	4.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K133	B	1	67	43.1	39.1	4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K134	B	1	67	41.4	37.9	3.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K135	B	1	67	41.8	39.2	2.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K136	B	1	67	41.9	40.2	1.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K137	B	1	67	45.2	44.6	0.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K138	B	1	67	44.2	39.1	5.1	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K139	B	1	67	42	37.9	4.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K140	B	1	67	41.2	38.5	2.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K141	B	1	67	41.5	40	1.5	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K142	B	1	67	43.8	43.1	0.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K143	B	1	67	43	38.3	4.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K144	B	1	67	40.3	37.2	3.1	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K145	B	1	67	39.7	37	2.7	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K146	B	1	67	39.3	36.9	2.4	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	K150	B	1	67	57.3	56.7	0.6	0	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK1	C	1	67	64.8	59.5	5.3	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK2	C	1	67	64.1	53.6	10.5	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK3	C	1	67	63.9	53.7	10.2	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK4	C	1	67	64	58.9	5.1	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK5	C	1	67	64	54.1	9.9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK6	C	1	67	64.2	53.9	10.3	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK7	C	1	67	64.2	54	10.2	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK8	C	1	67	63.9	53.8	10.1	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK9	C	1	67	63.8	53.7	10.1	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK10	C	1	67	65.6	54	11.6	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK11	C	1	67	66	53.5	12.5	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK12	C	1	67	65.6	53.9	11.7	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK13	C	1	67	65.6	53.8	11.8	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK14	C	1	67	65.6	53.7	11.9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK15	C	1	67	65.6	53.7	11.9	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK16	C	1	67	65.7	53.9	11.8	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK17	C	1	67	65.7	53.4	12.3	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK18	C	1	67	65.5	53.4	12.1	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK19	C	1	67	65.1	53.1	12	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK20	C	1	67	64.8	53.2	11.6	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
Wall TK	TK21	C	1	67	64.9	55.2	9.7	1	41	Yes	Yes	8	4705	37640	$ 1,355,040.00	$ 33,049.76	Propose to Construct
6ft height																	
Wall TK	K1	B	1	67	60	65.8	-5.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K2	B	1	67	57.9	53.8	4.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K3	B	1	67	52.3	50.7	1.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K4	B	1	67	54.6	52.9	1.7	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K5	B	1	67	54.8	52.4	2.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K6	B	1	67	50.4	47.3	3.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K7	B	1	67	52.1	48.9	3.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K8	B	1	67	49.6	47.3	2.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K9	B	1	67	60.6	54.2	6.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K10	B	1	67	52.3	46.5	5.8	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K11	B	1	67	60.4	52	8.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K12	G	1	67	58.6	50	8.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K13	B	1	67	58.8	50	8.8	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K14	B	1	67	58.7	49.9	8.8	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K15	B	1	67	58.8	49.8	9	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K16	B	1	67	58.5	49.2	9.3	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K17	B	1	67	57.8	49	8.8	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K18	B	1	67	54.9	49	5.9	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K19	B	1	67	55	48.9	6.1	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K20	B	1	67	52.2	45.7	6.5	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K21	B	1	67	62	61.6	0.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K22	B	1	67	61.1	60.9	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K23	B	1	67	44.4	44.2	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K24	B	1	67	41.2	41.1	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K25	B	1	67	44.9	44.1	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K26	B	1	67	44.8	42.8	2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K27	B	1	67	46.9	45.6	1.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K28	B	1	67	48.3	45.4	2.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
Wall TK	K29	B	1	67	48.7	44.8	3.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K30	B	1	67	35.1	35.1	0	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K31	B	1	67	39.9	39.1	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K32	B	1	67	45.2	43.6	1.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K33	B	1	67	45.3	42.2	3.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K34	B	1	67	47.5	44.6	2.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K35	B	1	67	49.6	43	6.6	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K36	B	1	67	49.1	43.9	5.2	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K37	B	1	67	62.4	62.1	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K38	B	1	67	62.3	62	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K39	B	1	67	62.1	62	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K40	B	1	67	62.8	62.6	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K41	B	1	67	43.9	43.6	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K42	B	1	67	43.4	43	0.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K43	B	1	67	43.7	42.4	1.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K44	B	1	67	46.5	45.3	1.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K45	B	1	67	44.5	43.7	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K46	B	1	67	46.9	44.6	2.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K47	B	1	67	45.6	44.2	1.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K48	B	1	67	45.3	42.9	2.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K49	B	1	67	43.7	42.1	1.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K50	B	1	67	40.4	39.9	0.5	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K51	B	1	67	41.6	40.6	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K52	B	1	67	40.7	39.7	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K53	B	1	67	44.4	40.6	3.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K54	B	1	67	41.2	38.5	2.7	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K55	B	1	67	39.9	38	1.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K56	B	1	67	41	38.8	2.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K57	B	1	67	48	41.9	6.1	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K58	B	1	67	45.9	41	4.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K59	B	1	67	46.4	41.2	5.2	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K60	B	1	67	46.5	40.9	5.6	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K61	B	1	67	45.9	40.5	5.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K62	B	1	67	63.2	62.2	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K63	B	1	67	63.2	62.2	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K64	B	1	67	63.1	62.2	0.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K65	B	1	67	63.1	62.1	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K66	B	1	67	63	62.2	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K67	B	1	67	63	62.1	0.9	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K68	B	1	67	61.4	61.4	0	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K69	B	1	67	62	61.6	0.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K70	B	1	67	59.5	59.4	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K71	B	1	67	60.3	60.1	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K72	B	1	67	43.3	43.1	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K73	B	1	67	43	42.7	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K74	B	1	67	43.1	42.9	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K75	B	1	67	44.1	44	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K76	B	1	67	46	45.9	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K77	B	1	67	49.1	49.1	0	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K78	B	1	67	43.2	43	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K79	B	1	67	43.9	43.7	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K80	B	1	67	44.1	44	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K81	B	1	67	45	44.9	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K82	B	1	67	45.8	45.7	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K83	B	1	67	49.4	49.3	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K84	B	1	67	42.5	41.7	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K85	B	1	67	42.8	42.2	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K86	B	1	67	42.8	42.4	0.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K87	B	1	67	43	42.7	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K88	B	1	67	44.1	43.9	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K89	B	1	67	46.5	46.4	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K90	B	1	67	43.7	43.1	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K91	B	1	67	44.7	44.4	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K92	B	1	67	46.7	46.5	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K93	B	1	67	45	44.8	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K94	B	1	67	45.4	45.2	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct

													Noise Level Comparison			
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria		
Wall TK	K95	B	1	67	47.9	47.9	0	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K96	B	1	67	44.9	43.6	1.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K97	B	1	67	44.4	43.4	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K98	B	1	67	44.1	43.5	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K99	B	1	67	44.3	44.1	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K100	B	1	67	45.5	45.3	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K101	B	1	67	50.7	50.7	0	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K102	B	1	67	43.3	41.7	1.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K103	B	1	67	43	41.7	1.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K104	B	1	67	42.7	41.9	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K105	B	1	67	43.2	42.8	0.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K106	B	1	67	44.8	44.5	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K107	B	1	67	49	48.9	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K108	B	1	67	40	38.6	1.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K109	B	1	67	40	38.8	1.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K110	B	1	67	39.7	39.1	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K111	B	1	67	40.6	40.2	0.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K112	B	1	67	42.9	42.8	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K113	B	1	67	49.3	49.2	0.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K114	B	1	67	39.8	38.8	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K115	B	1	67	40.1	39.3	0.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K116	B	1	67	40.6	40	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K117	B	1	67	42.4	41.9	0.5	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K118	B	1	67	44.8	44.6	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K119	B	1	67	48.8	48.8	0	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K120	B	1	67	41.1	39.6	1.5	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K121	B	1	67	41.4	39.7	1.7	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K122	B	1	67	41.5	39.9	1.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K123	B	1	67	41.5	40.5	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K124	B	1	67	42.5	41.9	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K125	B	1	67	46.4	46.1	0.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K126	B	1	67	41.6	40.5	1.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K127	B	1	67	41.9	39.8	2.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K128	B	1	67	40.4	39.1	1.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K129	B	1	67	41.1	40.1	1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K130	B	1	67	43.3	42.8	0.5	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K131	B	1	67	47.5	47.3	0.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K132	B	1	67	44.3	40.3	4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K133	B	1	67	43.1	39.5	3.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K134	B	1	67	41.4	38.3	3.1	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K135	B	1	67	41.8	39.5	2.3	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K136	B	1	67	41.9	40.4	1.5	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K137	B	1	67	45.2	44.6	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K138	B	1	67	44.2	39.6	4.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K139	B	1	67	42	38.4	3.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K140	B	1	67	41.2	38.8	2.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K141	B	1	67	41.5	40.1	1.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K142	B	1	67	43.8	43.1	0.7	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K143	B	1	67	43	38.8	4.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K144	B	1	67	40.3	37.5	2.8	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K145	B	1	67	39.7	37.3	2.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K146	B	1	67	39.3	37.1	2.2	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	K150	B	1	67	57.3	56.7	0.6	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK1	C	1	67	64.8	61.1	3.7	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK2	C	1	67	64.1	57.4	6.7	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK3	C	1	67	63.9	58.4	5.5	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK4	C	1	67	64	60.6	3.4	0	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK5	C	1	67	64	58.4	5.6	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK6	C	1	67	64.2	58.3	5.9	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK7	C	1	67	64.2	58.4	5.8	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK8	C	1	67	63.9	58.3	5.6	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK9	C	1	67	63.8	58.3	5.5	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK10	C	1	67	65.6	58.4	7.2	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK11	C	1	67	66	58.7	7.3	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK12	C	1	67	65.6	58.2	7.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct
Wall TK	TK13	C	1	67	65.6	58.2	7.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct

														Noise Level Comparison				
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TK	TK14	C	1	67	65.6	58.2	7.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK15	C	1	67	65.6	58.2	7.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK16	C	1	67	65.7	58.3	7.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK17	C	1	67	65.7	58.4	7.3	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK18	C	1	67	65.5	58.2	7.3	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK19	C	1	67	65.1	56.7	8.4	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK20	C	1	67	64.8	56.8	8	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	
Wall TK	TK21	C	1	67	64.9	58.6	6.3	1	36	Yes	Yes	6	4705	28230	$ 1,016,280.00	$ 28,230.00	Propose to Construct	

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-13: Wall TL - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TL	L2	G	1	-	58.9	46.5	12.4	0	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL1	C	1	67	67.5	52	15.5	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL2	C	1	67	67.4	46.7	20.7	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL3	C	1	67	67.5	46.7	20.8	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL4	C	1	67	67.4	46.9	20.5	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL5	C	1	67	67.4	46.9	20.5	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL6	C	1	67	67.4	47.2	20.2	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL7	C	1	67	67.4	47.9	19.5	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL8	C	1	67	67.1	48.5	18.6	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
Wall TL	TL9	C	1	67	66.4	49.9	16.5	1	9	Yes	Yes	20	2265	45300	$ 1,630,800.00	$ 181,200.00	Not Cost Effective
15ft height																	
Wall TL	L2	G	1	-	58.9	47.7	11.2	0	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL1	C	1	67	67.5	52.9	14.6	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL2	C	1	67	67.4	48.4	19	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL3	C	1	67	67.5	48.4	19.1	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL4	C	1	67	67.4	48.4	19	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL5	C	1	67	67.4	49.1	18.3	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL6	C	1	67	67.4	49.2	18.2	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL7	C	1	67	67.4	50.2	17.2	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL8	C	1	67	67.1	50.5	16.6	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
Wall TL	TL9	C	1	67	66.4	51.3	15.1	1	9	Yes	Yes	15	2265	33975	$ 1,223,100.00	$ 135,900.00	Not Cost Effective
10ft height																	
Wall TL	L2	G	1	-	58.9	52.3	6.6	0	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL1	C	1	67	67.5	54.6	12.9	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL2	C	1	67	67.4	51.4	16	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL3	C	1	67	67.5	51.4	16.1	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL4	C	1	67	67.4	51.4	16	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL5	C	1	67	67.4	51.6	15.8	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL6	C	1	67	67.4	52.5	14.9	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL7	C	1	67	67.4	53.2	14.2	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL8	C	1	67	67.1	53.7	13.4	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
Wall TL	TL9	C	1	67	66.4	53.9	12.5	1	10	Yes	Yes	10	2265	22650	$ 815,400.00	$ 81,540.00	Not Cost Effective
8ft height																	
Wall TL	L2	G	1	-	58.9	52.7	6.2	0	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL1	C	1	67	67.5	63.5	4	0	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL2	C	1	67	67.4	55.9	11.5	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL3	C	1	67	67.5	55.9	11.6	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL4	C	1	67	67.4	56.2	11.2	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL5	C	1	67	67.4	56.2	11.2	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL6	C	1	67	67.4	56.2	11.2	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL7	C	1	67	67.4	56.3	11.1	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL8	C	1	67	67.1	56.1	11	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective
Wall TL	TL9	C	1	67	66.4	55.8	10.6	1	8	Yes	Yes	8	2265	18120	$ 652,320.00	$ 81,540.00	Not Cost Effective

														Noise Level Comparison			
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria		
6ft height																	
Wall TL	L2	G	1	-	58.9	53.1	5.8	0	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL1	C	1	67	67.5	64.6	2.9	0	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL2	C	1	67	67.4	61.5	5.9	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL3	C	1	67	67.5	61.5	6	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL4	C	1	67	67.4	61.6	5.8	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL5	C	1	67	67.4	61.7	5.7	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL6	C	1	67	67.4	61.6	5.8	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL7	C	1	67	67.4	61.6	5.8	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL8	C	1	67	67.1	61.3	5.8	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal
Wall TL	TL9	C	1	67	66.4	60.8	5.6	1	8	Yes	No	6	2265	13590	$ 489,240.00	N/A	Does Not Meet Noise Reduction Design Goal

Table B-14: Wall M - Summary

.	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall M	M3	B	1	67	50.1	48.5	1.6	0	0	No	No	20	600	12000	432000	N/A	Does Not Meet Noise Reduction Design Goal
15ft height																	
Wall M	M3	B	1	67	50.1	48.7	1.4	0	0	No	No	15	600	9000	324000	N/A	Does Not Meet Noise Reduction Design Goal
10ft height																	
Wall M	M3	B	1	67	50.1	49.4	0.7	0	0	No	No	10	600	6000	216000	N/A	Does Not Meet Noise Reduction Design Goal
8ft height																	
Wall M	M3	B	1	67	50.1	49.5	0.6	0	0	No	No	8	600	4800	172800	N/A	Does Not Meet Noise Reduction Design Goal
6ft height																	
Wall M	M3	B	1	67	50.1	49.6	0.5	0	0	No	No	6	600	3600	129600	N/A	Does Not Meet Noise Reduction Design Goal

Table B-15: Wall TM-1 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TM-1	M2	G	1	-	54.4	54.1	0.3	0	2	Yes	Yes	20	365	7300	262800	131400	Not Cost Effective
Wall TM-1	M4	G	1	-	62	61.5	0.5	0	2	Yes	Yes	20	365	7300	262800	131400	Not Cost Effective
Wall TM-1	TM1	C	1	67	66.7	53	13.7	1	2	Yes	Yes	20	365	7300	262800	131400	Not Cost Effective
Wall TM-1	TM2	C	1	67	66.3	53.5	12.8	1	2	Yes	Yes	20	365	7300	262800	131400	Not Cost Effective
Wall TM-1	TM3	C	1	67	67.9	67.9	0	0	2	Yes	Yes	20	365	7300	262800	131400	Not Cost Effective
15ft height																	
Wall TM-1	M2	G	1	-	54.4	54.1	0.3	0	2	Yes	Yes	15	365	5475	197100	98550	Not Cost Effective
Wall TM-1	M4	G	1	-	62	61.6	0.4	0	2	Yes	Yes	15	365	5475	197100	98550	Not Cost Effective
Wall TM-1	TM1	C	1	67	66.7	53.3	13.4	1	2	Yes	Yes	15	365	5475	197100	98550	Not Cost Effective
Wall TM-1	TM2	C	1	67	66.3	54	12.3	1	2	Yes	Yes	15	365	5475	197100	98550	Not Cost Effective
Wall TM-1	TM3	C	1	67	67.9	67.9	0	0	2	Yes	Yes	15	365	5475	197100	98550	Not Cost Effective
10ft height																	
Wall TM-1	M2	G	1	-	54.4	54.2	0.2	0	2	Yes	Yes	10	365	3650	131400	65700	Propose to Construct
Wall TM-1	M4	G	1	-	62	61.6	0.4	0	2	Yes	Yes	10	365	3650	131400	65700	Propose to Construct
Wall TM-1	TM1	C	1	67	66.7	54.2	12.5	1	2	Yes	Yes	10	365	3650	131400	65700	Propose to Construct
Wall TM-1	TM2	C	1	67	66.3	55.3	11	1	2	Yes	Yes	10	365	3650	131400	65700	Propose to Construct
Wall TM-1	TM3	C	1	67	67.9	67.9	0	0	2	Yes	Yes	10	365	3650	131400	65700	Propose to Construct

												Noise Level Comparison				
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
8ft height																
Wall TM-1	M2	G	1	-	54.4	54.3	0.1	0	2	Yes	Yes	8	365	2920	105120	52560	Propose to Construct
Wall TM-1	M4	G	1	-	62	61.6	0.4	0	2	Yes	Yes	8	365	2920	105120	52560	Propose to Construct
Wall TM-1	TM1	C	1	67	66.7	55.2	11.5	1	2	Yes	Yes	8	365	2920	105120	52560	Propose to Construct
Wall TM-1	TM2	C	1	67	66.3	56.6	9.7	1	2	Yes	Yes	8	365	2920	105120	52560	Propose to Construct
Wall TM-1	TM3	C	1	67	67.9	67.9	0	0	2	Yes	Yes	8	365	2920	105120	52560	Propose to Construct
6ft height																
Wall TM-1	M2	G	1	-	54.4	54.3	0.1	0	2	Yes	Yes	6	365	2190	78840	39420	Propose to Construct
Wall TM-1	M4	G	1	-	62	61.6	0.4	0	2	Yes	Yes	6	365	2190	78840	39420	Propose to Construct
Wall TM-1	TM1	C	1	67	66.7	58.2	8.5	1	2	Yes	Yes	6	365	2190	78840	39420	Propose to Construct
Wall TM-1	TM2	C	1	67	66.3	60.7	5.6	1	2	Yes	Yes	6	365	2190	78840	39420	Propose to Construct
Wall TM-1	TM3	C	1	67	67.9	67.9	0	0	2	Yes	Yes	6	365	2190	78840	39420	Propose to Construct

Table B-16: Wall TM-2 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TM-2	M3	B	1	67	50.1	47.8	2.3	0	4	Yes	Yes	20	920	18400	662400	165600	Not Cost Effective
Wall TM-2	TM4	C	1	67	65.6	56.3	9.3	1	4	Yes	Yes	20	920	18400	662400	165600	Not Cost Effective
Wall TM-2	TM5	C	1	67	66.5	49	17.5	1	4	Yes	Yes	20	920	18400	662400	165600	Not Cost Effective
Wall TM-2	TM6	C	1	67	67.4	48.7	18.7	1	4	Yes	Yes	20	920	18400	662400	165600	Not Cost Effective
Wall TM-2	TM7	C	1	67	68	49.3	18.7	1	4	Yes	Yes	20	920	18400	662400	165600	Not Cost Effective
Wall TM-2	TM8	C	1	67	67.6	67.6	0	0	4	Yes	Yes	20	920	18400	662400	165600	Not Cost Effective
15ft height																	
Wall TM-2	M3	B	1	67	50.1	48	2.1	0	4	Yes	Yes	15	920	13800	496800	124200	Not Cost Effective
Wall TM-2	TM4	C	1	67	65.6	56.7	8.9	1	4	Yes	Yes	15	920	13800	496800	124200	Not Cost Effective
Wall TM-2	TM5	C	1	67	66.5	50.7	15.8	1	4	Yes	Yes	15	920	13800	496800	124200	Not Cost Effective
Wall TM-2	TM6	C	1	67	67.4	50.7	16.7	1	4	Yes	Yes	15	920	13800	496800	124200	Not Cost Effective
Wall TM-2	TM7	C	1	67	68	50.9	17.1	1	4	Yes	Yes	15	920	13800	496800	124200	Not Cost Effective
Wall TM-2	TM8	C	1	67	67.6	67.6	0	0	4	Yes	Yes	15	920	13800	496800	124200	Not Cost Effective
10ft height																	
Wall TM-2	M3	B	1	67	50.1	49.1	1	0	4	Yes	Yes	10	920	9200	331200	82800	Not Cost Effective
Wall TM-2	TM4	C	1	67	65.6	57.2	8.4	1	4	Yes	Yes	10	920	9200	331200	82800	Not Cost Effective
Wall TM-2	TM5	C	1	67	66.5	53.3	13.2	1	4	Yes	Yes	10	920	9200	331200	82800	Not Cost Effective
Wall TM-2	TM6	C	1	67	67.4	53.8	13.6	1	4	Yes	Yes	10	920	9200	331200	82800	Not Cost Effective
Wall TM-2	TM7	C	1	67	68	54.1	13.9	1	4	Yes	Yes	10	920	9200	331200	82800	Not Cost Effective
Wall TM-2	TM8	C	1	67	67.6	67.6	0	0	4	Yes	Yes	10	920	9200	331200	82800	Not Cost Effective
8ft height																	
Wall TM-2	M3	B	1	67	50.1	48.9	1.2	0	4	Yes	Yes	8	920	7360	264960	66240	Propose to Construct
Wall TM-2	TM4	C	1	67	65.6	58.1	7.5	1	4	Yes	Yes	8	920	7360	264960	66240	Propose to Construct
Wall TM-2	TM5	C	1	67	66.5	55.2	11.3	1	4	Yes	Yes	8	920	7360	264960	66240	Propose to Construct
Wall TM-2	TM6	C	1	67	67.4	56.3	11.1	1	4	Yes	Yes	8	920	7360	264960	66240	Propose to Construct
Wall TM-2	TM7	C	1	67	68	55.8	12.2	1	4	Yes	Yes	8	920	7360	264960	66240	Propose to Construct
Wall TM-2	TM8	C	1	67	67.6	67.6	0	0	4	Yes	Yes	8	920	7360	264960	66240	Propose to Construct
6ft height																	
Wall TM-2	M3	B	1	67	50.1	49.3	0.8	0	3	Yes	No	6	920	5520	198720	N/A	Does Not Meet Noise Reduction Design Goal
Wall TM-2	TM4	C	1	67	65.6	61	4.6	0	3	Yes	No	6	920	5520	198720	N/A	Does Not Meet Noise Reduction Design Goal
Wall TM-2	TM5	C	1	67	66.5	60.7	5.8	1	3	Yes	No	6	920	5520	198720	N/A	Does Not Meet Noise Reduction Design Goal
Wall TM-2	TM6	C	1	67	67.4	61.6	5.8	1	3	Yes	No	6	920	5520	198720	N/A	Does Not Meet Noise Reduction Design Goal
Wall TM-2	TM7	C	1	67	68	62.2	5.8	1	3	Yes	No	6	920	5520	198720	N/A	Does Not Meet Noise Reduction Design Goal
Wall TM-2	TM8	C	1	67	67.6	67.6	0	0	3	Yes	No	6	920	5520	198720	N/A	Does Not Meet Noise Reduction Design Goal

Table B-17: Wall TN - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TN	TN1	C	1	67	66.9	65.4	1.5	0	1	Yes	Yes	20	265	5300	$ 190,800.00	$ 190,800.00	Not Cost Effective
Wall TN	TN2	C	1	67	65.9	50.3	15.6	1	1	Yes	Yes	20	265	5300	$ 190,800.00	$ 190,800.00	Not Cost Effective
Wall TN	TN3	C	1	67	67.9	67.8	0.1	0	1	Yes	Yes	20	265	5300	$ 190,800.00	$ 190,800.00	Not Cost Effective
15ft height																	

													Noise Level Comparison					
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
Wall TN	TN1	C	1	67	66.9	65.4	1.5	0	1	Yes	Yes	15	265	3975	$ 143,100.00	$ 143,100.00	Not Cost Effective	
Wall TN	TN2	C	1	67	65.9	51.4	14.5	1	1	Yes	Yes	15	265	3975	$ 143,100.00	$ 143,100.00	Not Cost Effective	
Wall TN	TN3	C	1	67	67.9	67.8	0.1	0	1	Yes	Yes	15	265	3975	$ 143,100.00	$ 143,100.00	Not Cost Effective	
10ft height																		
Wall TN	TN1	C	1	67	66.9	65.4	1.5	0	1	Yes	Yes	10	265	2586	$ 93,096.00	$ 93,096.00	Not Cost Effective	
Wall TN	TN2	C	1	67	65.9	53.6	12.3	1	1	Yes	Yes	10	265	2586	$ 93,096.00	$ 93,096.00	Not Cost Effective	
Wall TN	TN3	C	1	67	67.9	67.8	0.1	0	1	Yes	Yes	10	265	2586	$ 93,096.00	$ 93,096.00	Not Cost Effective	
8ft height																		
Wall TN	TN1	C	1	67	66.9	65.5	1.4	0	1	Yes	Yes	8	265	2104	$ 75,744.00	$ 75,744.00	Propose to Construct	
Wall TN	TN2	C	1	67	65.9	55.5	10.4	1	1	Yes	Yes	8	265	2104	$ 75,744.00	$ 75,744.00	Propose to Construct	
Wall TN	TN3	C	1	67	67.9	67.8	0.1	0	1	Yes	Yes	8	265	2104	$ 75,744.00	$ 75,744.00	Propose to Construct	
6ft height																		
Wall TN	TN1	C	1	67	66.9	65.8	1.1	0	1	Yes	No	6	265	1590	$ 57,240.00	N/A	Does Not Meet Noise Reduction Design Goal	
Wall TN	TN2	C	1	67	65.9	60.2	5.7	1	1	Yes	No	6	265	1590	$ 57,240.00	N/A	Does Not Meet Noise Reduction Design Goal	
Wall TN	TN3	C	1	67	67.9	67.8	0.1	0	1	Yes	No	6	265	1590	$ 57,240.00	N/A	Does Not Meet Noise Reduction Design Goal	

Table B-18: Wall O - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall O	O1	B	1	67	53.3	48	5.3	1	1	Yes	No	20	1100	22000	792000	N/A	Does Not Meet Noise Reduction Design Goal
15ft height																	
Wall O	O1	B	1	67	53.3	49.4	3.9	0	0	No	No	15	1100	16500	594000	N/A	Does Not Meet Noise Reduction Design Goal
10ft height																	
Wall O	O1	B	1	67	53.3	51.6	1.7	0	0	No	No	10	1100	11000	396000	N/A	Does Not Meet Noise Reduction Design Goal
8ft height																	
Wall O	O1	B	1	67	53.3	51.8	1.5	0	0	No	No	8	1100	8800	316800	N/A	Does Not Meet Noise Reduction Design Goal
6ft height																	
Wall O	O1	B	1	67	53.3	52.3	1	0	0	No	No	6	1100	6600	237600	N/A	Does Not Meet Noise Reduction Design Goal

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-19: Wall TO - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TO	O1	B	1	67	53.3	44.2	9.1	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP1	C	1	67	71.1	70.6	0.5	0	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP2	C	1	67	71.4	52.7	18.7	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP3	C	1	67	71.5	50.9	20.6	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP4	C	1	67	71.2	50.9	20.3	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP5	C	1	67	71	50.9	20.1	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP6	C	1	67	71.2	50.3	20.9	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP7	C	1	67	71.2	50.4	20.8	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP8	C	1	67	71.2	50.3	20.9	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TP9	C	1	67	71.4	49.8	21.6	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO1	C	1	67	71.3	50.3	21	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO2	C	1	67	71.1	50.7	20.4	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO3	C	1	67	71.1	50.5	20.6	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO4	C	1	67	71.2	50.2	21	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO5	C	1	67	68.2	48.7	19.5	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO6	C	1	67	66.3	47	19.3	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO7	C	1	67	66.2	47	19.2	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO8	C	1	67	67.5	47.1	20.4	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO9	C	1	67	67.3	47.1	20.2	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO10	C	1	67	66.7	47	19.7	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO11	C	1	67	67	47.1	19.9	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO12	C	1	67	67	47.3	19.7	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO13	C	1	67	66.9	47.7	19.2	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
Wall TO	TO14	C	1	67	66.8	50.2	16.6	1	23	Yes	Yes	20	5545	110900	$ 3,992,400.00	$ 173,582.61	Not Cost Effective
15ft height																	
Wall TO	O1	B	1	67	53.3	47	6.3	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP1	C	1	67	71.1	70.6	0.5	0	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP2	C	1	67	71.4	54.7	16.7	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP3	C	1	67	71.5	53.6	17.9	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP4	C	1	67	71.2	53.4	17.8	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP5	C	1	67	71	53.3	17.7	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP6	C	1	67	71.2	53.3	17.9	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP7	C	1	67	71.2	53.2	18	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP8	C	1	67	71.2	52.9	18.3	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TP9	C	1	67	71.4	52.3	19.1	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO1	C	1	67	71.3	52.7	18.6	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO2	C	1	67	71.1	53.2	17.9	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO3	C	1	67	71.1	53.2	17.9	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO4	C	1	67	71.2	53.2	18	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO5	C	1	67	68.2	51.3	16.9	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO6	C	1	67	66.3	49.6	16.7	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO7	C	1	67	66.2	49.5	16.7	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO8	C	1	67	67.5	49.7	17.8	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO9	C	1	67	67.3	49.7	17.6	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO10	C	1	67	66.7	49.5	17.2	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO11	C	1	67	67	49.8	17.2	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO12	C	1	67	67	49.8	17.2	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO13	C	1	67	66.9	50.1	16.8	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective
Wall TO	TO14	C	1	67	66.8	51.6	15.2	1	23	Yes	Yes	15	5545	83175	$ 2,994,300.00	$ 130,186.96	Not Cost Effective

														Noise Level Comparison			
														XX	Approaches or Exceeds FHWA Noise Abatement Criteria		
10ft height																	
Wall TO	O1	B	1	67	53.3	50.7	2.6	0	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP1	C	1	67	71.1	70.6	0.5	0	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP2	C	1	67	71.4	57.5	13.9	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP3	C	1	67	71.5	57	14.5	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP4	C	1	67	71.2	56.9	14.3	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP5	C	1	67	71	56.9	14.1	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP6	C	1	67	71.2	56.8	14.4	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP7	C	1	67	71.2	56.7	14.5	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP8	C	1	67	71.2	56.6	14.6	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TP9	C	1	67	71.4	56.6	14.8	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO1	C	1	67	71.3	56.7	14.6	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO2	C	1	67	71.1	56.7	14.4	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO3	C	1	67	71.1	56.9	14.2	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO4	C	1	67	71.2	56.7	14.5	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO5	C	1	67	68.2	55	13.2	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO6	C	1	67	66.3	53.3	13	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO7	C	1	67	66.2	52.9	13.3	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO8	C	1	67	67.5	53.2	14.3	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO9	C	1	67	67.3	53.4	13.9	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO10	C	1	67	66.7	53	13.7	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO11	C	1	67	67	53.2	13.8	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO12	C	1	67	67	53.2	13.8	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO13	C	1	67	66.9	53.3	13.6	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
Wall TO	TO14	C	1	67	66.8	54	12.8	1	22	Yes	Yes	10	5545	55450	$ 1,996,200.00	$ 90,736.36	Not Cost Effective
8ft height																	
Wall TO	O1	B	1	67	53.3	51	2.3	0	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP1	C	1	67	71.1	70.6	0.5	0	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP2	C	1	67	71.4	60.1	11.3	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP3	C	1	67	71.5	59.5	12	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP4	C	1	67	71.2	59.5	11.7	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP5	C	1	67	71	59.6	11.4	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP6	C	1	67	71.2	59.3	11.9	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP7	C	1	67	71.2	59.3	11.9	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP8	C	1	67	71.2	59	12.2	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TP9	C	1	67	71.4	58.8	12.6	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO1	C	1	67	71.3	58.9	12.4	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO2	C	1	67	71.1	59.4	11.7	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO3	C	1	67	71.1	59.5	11.6	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO4	C	1	67	71.2	59.6	11.6	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO5	C	1	67	68.2	57.1	11.1	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO6	C	1	67	66.3	55.2	11.1	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO7	C	1	67	66.2	55.3	10.9	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO8	C	1	67	67.5	55.8	11.7	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO9	C	1	67	67.3	56	11.3	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO10	C	1	67	66.7	55.4	11.3	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO11	C	1	67	67	55.8	11.2	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO12	C	1	67	67	55.8	11.2	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO13	C	1	67	66.9	55.7	11.2	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct
Wall TO	TO14	C	1	67	66.8	56.2	10.6	1	22	Yes	Yes	8	5545	44360	$ 1,596,960.00	$ 72,589.09	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
6ft height																	
Wall TO	O1	B	1	67	53.3	51.5	1.8	0	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP1	C	1	67	71.1	70.7	0.4	0	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP2	C	1	67	71.4	65	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP3	C	1	67	71.5	65.1	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP4	C	1	67	71.2	64.8	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP5	C	1	67	71	64.7	6.3	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP6	C	1	67	71.2	64.8	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP7	C	1	67	71.2	64.8	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP8	C	1	67	71.2	64.8	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TP9	C	1	67	71.4	62.7	8.7	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO1	C	1	67	71.3	65	6.3	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO2	C	1	67	71.1	64.7	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO3	C	1	67	71.1	64.7	6.4	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO4	C	1	67	71.2	64.7	6.5	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO5	C	1	67	68.2	62	6.2	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO6	C	1	67	66.3	60.6	5.7	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO7	C	1	67	66.2	60.5	5.7	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO8	C	1	67	67.5	61.2	6.3	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO9	C	1	67	67.3	61.3	6	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO10	C	1	67	66.7	60.8	5.9	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO11	C	1	67	67	61.1	5.9	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO12	C	1	67	67	61.2	5.8	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO13	C	1	67	66.9	61	5.9	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct
Wall TO	TO14	C	1	67	66.8	61	5.8	1	22	Yes	Yes	6	5545	33270	$ 1,197,720.00	$ 54,441.82	Propose to Construct

Table B-20: Wall TKb - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall TKb	K1	B	1	67	60	58.5	1.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K2	B	1	67	57.9	44.8	13.1	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K3	B	1	67	52.3	44.3	8	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K4	B	1	67	54.6	46.7	7.9	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K5	B	1	67	54.8	47.1	7.7	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K6	B	1	67	50.4	45.2	5.2	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K7	B	1	67	52.1	46.9	5.2	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K8	B	1	67	49.6	45.7	3.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K9	B	1	67	60.6	55.9	4.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K10	B	1	67	52.3	44.5	7.8	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K11	B	1	67	60.4	49.1	11.3	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K12	G	1	67	58.6	46.3	12.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K13	B	1	67	58.8	45.8	13	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K14	B	1	67	58.7	45.5	13.2	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K15	B	1	67	58.8	45.4	13.4	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K16	B	1	67	58.5	45.7	12.8	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K17	B	1	67	57.8	45.9	11.9	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K18	B	1	67	54.9	46.5	8.4	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K19	B	1	67	55	47.8	7.2	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K20	B	1	67	52.2	47.3	4.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K21	B	1	67	62	61.5	0.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K22	B	1	67	61.1	60.8	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K23	B	1	67	44.4	44	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K24	B	1	67	41.2	40.8	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K25	B	1	67	44.9	43.2	1.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K26	B	1	67	44.8	42.6	2.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K27	B	1	67	46.9	44	2.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K28	B	1	67	48.3	44.2	4.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K29	B	1	67	48.7	43.7	5	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K30	B	1	67	35.1	34.4	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K31	B	1	67	39.9	38.4	1.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K32	B	1	67	45.2	43.5	1.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K33	B	1	67	45.3	41.3	4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct

												Noise Level Comparison					
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria				
Wall TKb	K34	B	1	67	47.5	43.7	3.8	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K35	B	1	67	49.6	44.5	5.1	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K36	B	1	67	49.1	45.2	3.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K37	B	1	67	62.4	62.1	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K38	B	1	67	62.3	62	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K39	B	1	67	62.1	62	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K40	B	1	67	62.8	62.6	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K41	B	1	67	43.9	43.2	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K42	B	1	67	43.4	42.8	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K43	B	1	67	43.7	42.1	1.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K44	B	1	67	46.5	44.5	2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K45	B	1	67	44.5	43.1	1.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K46	B	1	67	46.9	43.7	3.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K47	B	1	67	45.6	43.5	2.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K48	B	1	67	45.3	42.1	3.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K49	B	1	67	43.7	41.4	2.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K50	B	1	67	40.4	39.3	1.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K51	B	1	67	41.6	40.1	1.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K52	B	1	67	40.7	39	1.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K53	B	1	67	44.4	40.2	4.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K54	B	1	67	41.2	36.6	4.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K55	B	1	67	39.9	36.7	3.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K56	B	1	67	41	37.8	3.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K57	B	1	67	48	42.9	5.1	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K58	B	1	67	45.9	41.2	4.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K59	B	1	67	46.4	41.4	5	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K60	B	1	67	46.5	41.3	5.2	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K61	B	1	67	45.9	41.3	4.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K62	B	1	67	63.2	62.2	1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K63	B	1	67	63.2	62.2	1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K64	B	1	67	63.1	62.2	0.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K65	B	1	67	63.1	62.1	1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K66	B	1	67	63	62.2	0.8	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K67	B	1	67	63	62.1	0.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K68	B	1	67	61.4	61.4	0	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K69	B	1	67	62	61.6	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K70	B	1	67	59.5	59.4	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K71	B	1	67	60.3	60.4	-0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K72	B	1	67	43.3	42.8	0.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K73	B	1	67	43	42.4	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K74	B	1	67	43.1	42.5	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K75	B	1	67	44.1	43.6	0.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K76	B	1	67	46	45.7	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K77	B	1	67	49.1	49	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K78	B	1	67	43.2	42.8	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K79	B	1	67	43.9	43.5	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K80	B	1	67	44.1	43.8	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K81	B	1	67	45	44.8	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K82	B	1	67	45.8	45.6	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K83	B	1	67	49.4	49.3	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K84	B	1	67	42.5	41.3	1.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K85	B	1	67	42.8	41.9	0.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K86	B	1	67	42.8	42.2	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K87	B	1	67	43	42.5	0.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K88	B	1	67	44.1	43.8	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K89	B	1	67	46.5	46.4	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K90	B	1	67	43.7	42.8	0.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K91	B	1	67	44.7	44.3	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K92	B	1	67	46.7	46.5	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K93	B	1	67	45	44.7	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K94	B	1	67	45.4	45.2	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K95	B	1	67	47.9	47.9	0	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K96	B	1	67	44.9	43	1.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K97	B	1	67	44.4	43.1	1.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K98	B	1	67	44.1	43.5	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K99	B	1	67	44.3	43.9	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct

													Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K100	B	1	67	45.5	45.2	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K101	B	1	67	50.7	50.6	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K102	B	1	67	43.3	41.1	2.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K103	B	1	67	43	41.3	1.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K104	B	1	67	42.7	41.5	1.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K105	B	1	67	43.2	42.5	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K106	B	1	67	44.8	44.4	0.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K107	B	1	67	49	48.9	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K108	B	1	67	40	38.5	1.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K109	B	1	67	40	38.6	1.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K110	B	1	67	39.7	38.8	0.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K111	B	1	67	40.6	39.9	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K112	B	1	67	42.9	42.6	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K113	B	1	67	49.3	49.2	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K114	B	1	67	39.8	38.1	1.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K115	B	1	67	40.1	38.8	1.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K116	B	1	67	40.6	39.7	0.9	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K117	B	1	67	42.4	41.7	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K118	B	1	67	44.8	44.6	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K119	B	1	67	48.8	48.7	0.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K120	B	1	67	41.1	38.5	2.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K121	B	1	67	41.4	39.4	2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K122	B	1	67	41.5	39.7	1.8	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K123	B	1	67	41.5	40.4	1.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K124	B	1	67	42.5	41.8	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K125	B	1	67	46.4	46.1	0.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K126	B	1	67	41.6	40.1	1.5	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K127	B	1	67	41.9	39.6	2.3	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K128	B	1	67	40.4	38.7	1.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K129	B	1	67	41.1	39.9	1.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K130	B	1	67	43.3	42.7	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K131	B	1	67	47.5	47.3	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K132	B	1	67	44.3	40.3	4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K133	B	1	67	43.1	39.5	3.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K134	B	1	67	41.4	38	3.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K135	B	1	67	41.8	39.4	2.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K136	B	1	67	41.9	40.3	1.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K137	B	1	67	45.2	44.6	0.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K138	B	1	67	44.2	39.6	4.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K139	B	1	67	42	37.9	4.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K140	B	1	67	41.2	38.4	2.8	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K141	B	1	67	41.5	39.9	1.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K142	B	1	67	43.8	43.1	0.7	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K143	B	1	67	43	39.4	3.6	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K144	B	1	67	40.3	37.9	2.4	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K145	B	1	67	39.7	37.6	2.1	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	K146	B	1	67	39.3	37.3	2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK1	C	1	67	64.8	48.2	16.6	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK2	C	1	67	64.1	47.2	16.9	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK3	C	1	67	63.9	49.2	14.7	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK4	C	1	67	64	63.8	0.2	0	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK5	C	1	67	64	45.8	18.2	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK6	C	1	67	64.2	45.9	18.3	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK7	C	1	67	64.2	45.5	18.7	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK8	C	1	67	63.9	46.9	17	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK9	C	1	67	63.8	0	63.8	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
Wall TKb	TK10	C	1	67	65.6	0	65.6	1	29	Yes	Yes	20	1960	39200	1411200	48662.06897	Propose to Construct
15ft height																	
Wall TKb	K1	B	1	67	60	58.6	1.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K2	B	1	67	57.9	46.1	11.8	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K3	B	1	67	52.3	45.2	7.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K4	B	1	67	54.6	47.5	7.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K5	B	1	67	54.8	47.7	7.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K6	B	1	67	50.4	45.5	4.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K7	B	1	67	52.1	47.2	4.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K8	B	1	67	49.6	46	3.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct

													Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K9	B	1	67	60.6	56	4.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K10	B	1	67	52.3	44.9	7.4	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K11	B	1	67	60.4	49.7	10.7	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K12	G	1	67	58.6	47.1	11.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K13	B	1	67	58.8	46.7	12.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K14	B	1	67	58.7	46.6	12.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K15	B	1	67	58.8	46.5	12.3	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K16	B	1	67	58.5	46.7	11.8	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K17	B	1	67	57.8	46.9	10.9	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K18	B	1	67	54.9	47.4	7.5	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K19	B	1	67	55	48.4	6.6	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K20	B	1	67	52.2	47.5	4.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K21	B	1	67	62	61.5	0.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K22	B	1	67	61.1	60.8	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K23	B	1	67	44.4	44.1	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K24	B	1	67	41.2	40.9	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K25	B	1	67	44.9	43.4	1.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K26	B	1	67	44.8	42.7	2.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K27	B	1	67	46.9	44.3	2.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K28	B	1	67	48.3	44.4	3.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K29	B	1	67	48.7	43.9	4.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K30	B	1	67	35.1	34.6	0.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K31	B	1	67	39.9	38.5	1.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K32	B	1	67	45.2	43.5	1.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K33	B	1	67	45.3	41.4	3.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K34	B	1	67	47.5	43.8	3.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K35	B	1	67	49.6	44.6	5	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K36	B	1	67	49.1	45.3	3.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K37	B	1	67	62.4	62.1	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K38	B	1	67	62.3	62	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K39	B	1	67	62.1	62	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K40	B	1	67	62.8	62.6	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K41	B	1	67	43.9	43.3	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K42	B	1	67	43.4	42.8	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K43	B	1	67	43.7	42.1	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K44	B	1	67	46.5	44.6	1.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K45	B	1	67	44.5	43.2	1.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K46	B	1	67	46.9	43.9	3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K47	B	1	67	45.6	43.6	2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K48	B	1	67	45.3	42.3	3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K49	B	1	67	43.7	41.6	2.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K50	B	1	67	40.4	39.4	1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K51	B	1	67	41.6	40.2	1.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K52	B	1	67	40.7	39.1	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K53	B	1	67	44.4	40.3	4.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K54	B	1	67	41.2	36.8	4.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K55	B	1	67	39.9	36.9	3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K56	B	1	67	41	37.9	3.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K57	B	1	67	48	43	5	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K58	B	1	67	45.9	41.3	4.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K59	B	1	67	46.4	41.5	4.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K60	B	1	67	46.5	41.4	5.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K61	B	1	67	45.9	41.4	4.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K62	B	1	67	63.2	62.2	1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K63	B	1	67	63.2	62.2	1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K64	B	1	67	63.1	62.2	0.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K65	B	1	67	63.1	62.1	1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K66	B	1	67	63	62.2	0.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K67	B	1	67	63	62.1	0.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K68	B	1	67	61.4	61.4	0	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K69	B	1	67	62	61.6	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K70	B	1	67	59.5	59.4	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K71	B	1	67	60.3	60.4	-0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K72	B	1	67	43.3	42.9	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K73	B	1	67	43	42.3	0.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K74	B	1	67	43.1	42.5	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct

													Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K75	B	1	67	44.1	43.7	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K76	B	1	67	46	45.7	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K77	B	1	67	49.1	49	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K78	B	1	67	43.2	42.9	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K79	B	1	67	43.9	43.5	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K80	B	1	67	44.1	43.8	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K81	B	1	67	45	44.8	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K82	B	1	67	45.8	45.7	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K83	B	1	67	49.4	49.3	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K84	B	1	67	42.5	41.4	1.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K85	B	1	67	42.8	42	0.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K86	B	1	67	42.8	42.2	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K87	B	1	67	43	42.6	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K88	B	1	67	44.1	43.8	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K89	B	1	67	46.5	46.4	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K90	B	1	67	43.7	42.9	0.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K91	B	1	67	44.7	44.3	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K92	B	1	67	46.7	46.5	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K93	B	1	67	45	44.8	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K94	B	1	67	45.4	45.2	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K95	B	1	67	47.9	47.9	0	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K96	B	1	67	44.9	43.1	1.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K97	B	1	67	44.4	43.2	1.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K98	B	1	67	44.1	43.5	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K99	B	1	67	44.3	43.9	0.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K100	B	1	67	45.5	45.2	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K101	B	1	67	50.7	50.6	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K102	B	1	67	43.3	41.2	2.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K103	B	1	67	43	41.4	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K104	B	1	67	42.7	41.6	1.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K105	B	1	67	43.2	42.5	0.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K106	B	1	67	44.8	44.5	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K107	B	1	67	49	48.9	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K108	B	1	67	40	38.6	1.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K109	B	1	67	40	38.7	1.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K110	B	1	67	39.7	38.8	0.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K111	B	1	67	40.6	39.9	0.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K112	B	1	67	42.9	42.6	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K113	B	1	67	49.3	49.2	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K114	B	1	67	39.8	38.2	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K115	B	1	67	40.1	38.9	1.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K116	B	1	67	40.6	39.7	0.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K117	B	1	67	42.4	41.7	0.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K118	B	1	67	44.8	44.6	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K119	B	1	67	48.8	48.7	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K120	B	1	67	41.1	38.6	2.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K121	B	1	67	41.4	39.5	1.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K122	B	1	67	41.5	39.8	1.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K123	B	1	67	41.5	40.4	1.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K124	B	1	67	42.5	41.8	0.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K125	B	1	67	46.4	46.1	0.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K126	B	1	67	41.6	40.2	1.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K127	B	1	67	41.9	39.7	2.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K128	B	1	67	40.4	38.8	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K129	B	1	67	41.1	39.9	1.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K130	B	1	67	43.3	42.7	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K131	B	1	67	47.5	47.3	0.2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K132	B	1	67	44.3	40.4	3.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K133	B	1	67	43.1	39.5	3.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K134	B	1	67	41.4	38.1	3.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K135	B	1	67	41.8	39.4	2.4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K136	B	1	67	41.9	40.3	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K137	B	1	67	45.2	44.6	0.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K138	B	1	67	44.2	39.7	4.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K139	B	1	67	42	38	4	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K140	B	1	67	41.2	38.4	2.8	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct

													Noise Level Comparison			
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K141	B	1	67	41.5	39.9	1.6	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K142	B	1	67	43.8	43.1	0.7	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K143	B	1	67	43	39.5	3.5	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K144	B	1	67	40.3	38	2.3	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K145	B	1	67	39.7	37.7	2	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	K146	B	1	67	39.3	37.4	1.9	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK1	C	1	67	64.8	49.5	15.3	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK2	C	1	67	64.1	48.7	15.4	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK3	C	1	67	63.9	50.1	13.8	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK4	C	1	67	64	63.9	0.1	0	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK5	C	1	67	64	47.9	16.1	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK6	C	1	67	64.2	48	16.2	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK7	C	1	67	64.2	47.7	16.5	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK8	C	1	67	63.9	48.5	15.4	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK9	C	1	67	63.8	0	63.8	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
Wall TKb	TK10	C	1	67	65.6	0	65.6	1	25	Yes	Yes	15	1960	29400	1058400	42336	Propose to Construct
10ft height																	
Wall TKb	K1	B	1	67	60	58.7	1.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K2	B	1	67	57.9	48.4	9.5	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K3	B	1	67	52.3	47.8	4.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K4	B	1	67	54.6	49.2	5.4	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K5	B	1	67	54.8	50.1	4.7	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K6	B	1	67	50.4	47.2	3.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K7	B	1	67	52.1	48.5	3.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K8	B	1	67	49.6	47.2	2.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K9	B	1	67	60.6	56.3	4.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K10	B	1	67	52.3	46.8	5.5	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K11	B	1	67	60.4	51.2	9.2	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K12	G	1	67	58.6	50.7	7.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K13	B	1	67	58.8	50.7	8.1	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K14	B	1	67	58.7	50.6	8.1	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K15	B	1	67	58.8	50.7	8.1	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K16	B	1	67	58.5	50.4	8.1	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K17	B	1	67	57.8	50.5	7.3	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K18	B	1	67	54.9	50.9	4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K19	B	1	67	55	51	4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K20	B	1	67	52.2	48.6	3.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K21	B	1	67	62	61.5	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K22	B	1	67	61.1	60.8	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K23	B	1	67	44.4	44.2	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K24	B	1	67	41.2	41.1	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K25	B	1	67	44.9	43.8	1.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K26	B	1	67	44.8	43.2	1.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K27	B	1	67	46.9	45.3	1.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K28	B	1	67	48.3	45.5	2.8	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K29	B	1	67	48.7	45.3	3.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K30	B	1	67	35.1	34.8	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K31	B	1	67	39.9	39	0.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K32	B	1	67	45.2	43.9	1.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K33	B	1	67	45.3	42.2	3.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K34	B	1	67	47.5	44.5	3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K35	B	1	67	49.6	45.2	4.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K36	B	1	67	49.1	45.7	3.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K37	B	1	67	62.4	62.1	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K38	B	1	67	62.3	62	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K39	B	1	67	62.1	62	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K40	B	1	67	62.8	62.6	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K41	B	1	67	43.9	43.5	0.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K42	B	1	67	43.4	43	0.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K43	B	1	67	43.7	42.6	1.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K44	B	1	67	46.5	45.2	1.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K45	B	1	67	44.5	43.6	0.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K46	B	1	67	46.9	44.8	2.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K47	B	1	67	45.6	44.2	1.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K48	B	1	67	45.3	43.2	2.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K49	B	1	67	43.7	42.2	1.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct

													Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K50	B	1	67	40.4	39.8	0.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K51	B	1	67	41.6	40.5	1.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K52	B	1	67	40.7	39.5	1.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K53	B	1	67	44.4	41.1	3.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K54	B	1	67	41.2	37.8	3.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K55	B	1	67	39.9	37.8	2.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K56	B	1	67	41	38.7	2.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K57	B	1	67	48	43.5	4.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K58	B	1	67	45.9	41.8	4.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K59	B	1	67	46.4	42	4.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K60	B	1	67	46.5	41.9	4.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K61	B	1	67	45.9	41.7	4.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K62	B	1	67	63.2	62.2	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K63	B	1	67	63.2	62.2	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K64	B	1	67	63.1	62.2	0.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K65	B	1	67	63.1	62.1	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K66	B	1	67	63	62.2	0.8	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K67	B	1	67	63	62.1	0.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K68	B	1	67	61.4	61.4	0	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K69	B	1	67	62	61.6	0.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K70	B	1	67	59.5	59.4	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K71	B	1	67	60.3	60.4	-0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K72	B	1	67	43.3	43.1	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K73	B	1	67	43	42.5	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K74	B	1	67	43.1	42.6	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K75	B	1	67	44.1	43.8	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K76	B	1	67	46	45.8	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K77	B	1	67	49.1	49.1	0	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K78	B	1	67	43.2	42.9	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K79	B	1	67	43.9	43.6	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K80	B	1	67	44.1	43.9	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K81	B	1	67	45	44.9	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K82	B	1	67	45.8	45.7	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K83	B	1	67	49.4	49.3	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K84	B	1	67	42.5	41.8	0.7	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K85	B	1	67	42.8	42.3	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K86	B	1	67	42.8	42.4	0.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K87	B	1	67	43	42.7	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K88	B	1	67	44.1	43.9	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K89	B	1	67	46.5	46.4	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K90	B	1	67	43.7	43.1	0.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K91	B	1	67	44.7	44.4	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K92	B	1	67	46.7	46.6	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K93	B	1	67	45	44.9	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K94	B	1	67	45.4	45.3	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K95	B	1	67	47.9	47.9	0	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K96	B	1	67	44.9	43.4	1.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K97	B	1	67	44.4	43.4	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K98	B	1	67	44.1	43.7	0.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K99	B	1	67	44.3	44	0.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K100	B	1	67	45.5	45.3	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K101	B	1	67	50.7	50.6	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K102	B	1	67	43.3	41.7	1.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K103	B	1	67	43	41.7	1.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K104	B	1	67	42.7	41.8	0.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K105	B	1	67	43.2	42.7	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K106	B	1	67	44.8	44.6	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K107	B	1	67	49	48.9	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K108	B	1	67	40	38.9	1.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K109	B	1	67	40	38.9	1.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K110	B	1	67	39.7	39	0.7	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K111	B	1	67	40.6	40	0.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K112	B	1	67	42.9	42.7	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K113	B	1	67	49.3	49.2	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K114	B	1	67	39.8	38.6	1.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K115	B	1	67	40.1	39.1	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct

												Noise Level Comparison				
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K116	B	1	67	40.6	39.9	0.7	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K117	B	1	67	42.4	41.9	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K118	B	1	67	44.8	44.6	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K119	B	1	67	48.8	48.8	0	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K120	B	1	67	41.1	39.1	2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K121	B	1	67	41.4	39.7	1.7	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K122	B	1	67	41.5	40	1.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K123	B	1	67	41.5	40.5	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K124	B	1	67	42.5	41.9	0.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K125	B	1	67	46.4	46.2	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K126	B	1	67	41.6	40.5	1.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K127	B	1	67	41.9	40	1.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K128	B	1	67	40.4	39.1	1.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K129	B	1	67	41.1	40.1	1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K130	B	1	67	43.3	42.8	0.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K131	B	1	67	47.5	47.3	0.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K132	B	1	67	44.3	40.7	3.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K133	B	1	67	43.1	39.8	3.3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K134	B	1	67	41.4	38.4	3	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K135	B	1	67	41.8	39.6	2.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K136	B	1	67	41.9	40.4	1.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K137	B	1	67	45.2	44.6	0.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K138	B	1	67	44.2	40.2	4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K139	B	1	67	42	38.5	3.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K140	B	1	67	41.2	38.7	2.5	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K141	B	1	67	41.5	40.1	1.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K142	B	1	67	43.8	43.2	0.6	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K143	B	1	67	43	39.6	3.4	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K144	B	1	67	40.3	38.1	2.2	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K145	B	1	67	39.7	37.8	1.9	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	K146	B	1	67	39.3	37.5	1.8	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK1	C	1	67	64.8	52.1	12.7	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK2	C	1	67	64.1	51.5	12.6	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK3	C	1	67	63.9	52.4	11.5	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK4	C	1	67	64	63.9	0.1	0	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK5	C	1	67	64	51.3	12.7	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK6	C	1	67	64.2	51.6	12.6	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK7	C	1	67	64.2	51.4	12.8	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
Wall TKb	TK8	C	1	67	63.9	51.3	12.6	1	17	Yes	Yes	10	1960	19600	705600	41505.88235	Propose to Construct
										8ft height							
Wall TKb	K1	B	1	67	60	58.8	1.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K2	B	1	67	57.9	50.4	7.5	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K3	B	1	67	52.3	48.8	3.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K4	B	1	67	54.6	50.8	3.8	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K5	B	1	67	54.8	50.6	4.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K6	B	1	67	50.4	47.5	2.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K7	B	1	67	52.1	48.9	3.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K8	B	1	67	49.6	47.5	2.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K9	B	1	67	60.6	56.7	3.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K10	B	1	67	52.3	47.2	5.1	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K11	B	1	67	60.4	53.3	7.1	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K12	G	1	67	58.6	51.1	7.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K13	B	1	67	58.8	51.2	7.6	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K14	B	1	67	58.7	51.2	7.5	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K15	B	1	67	58.8	51.2	7.6	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K16	B	1	67	58.5	51	7.5	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K17	B	1	67	57.8	51.1	6.7	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K18	B	1	67	54.9	51.4	3.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K19	B	1	67	55	51.5	3.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K20	B	1	67	52.2	48.8	3.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K21	B	1	67	62	61.6	0.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K22	B	1	67	61.1	60.8	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K23	B	1	67	44.4	44.3	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K24	B	1	67	41.2	41.1	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K25	B	1	67	44.9	43.9	1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K26	B	1	67	44.8	43.3	1.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K27	B	1	67	46.9	45.5	1.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K28	B	1	67	48.3	45.7	2.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K29	B	1	67	48.7	45.5	3.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K30	B	1	67	35.1	34.9	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K31	B	1	67	39.9	39.2	0.7	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K32	B	1	67	45.2	43.9	1.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K33	B	1	67	45.3	42.4	2.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K34	B	1	67	47.5	44.6	2.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K35	B	1	67	49.6	45.3	4.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K36	B	1	67	49.1	45.8	3.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K37	B	1	67	62.4	62.1	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K38	B	1	67	62.3	62	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K39	B	1	67	62.1	62	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K40	B	1	67	62.8	62.6	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K41	B	1	67	43.9	43.6	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K42	B	1	67	43.4	43.1	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K43	B	1	67	43.7	42.7	1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K44	B	1	67	46.5	45.3	1.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K45	B	1	67	44.5	43.7	0.8	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K46	B	1	67	46.9	44.9	2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K47	B	1	67	45.6	44.3	1.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K48	B	1	67	45.3	43.4	1.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K49	B	1	67	43.7	42.3	1.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K50	B	1	67	40.4	39.9	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K51	B	1	67	41.6	40.5	1.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K52	B	1	67	40.7	39.6	1.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K53	B	1	67	44.4	41.3	3.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K54	B	1	67	41.2	38	3.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K55	B	1	67	39.9	38	1.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K56	B	1	67	41	38.9	2.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K57	B	1	67	48	43.6	4.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K58	B	1	67	45.9	41.9	4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K59	B	1	67	46.4	42.1	4.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K60	B	1	67	46.5	41.9	4.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K61	B	1	67	45.9	41.7	4.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K62	B	1	67	63.2	62.2	1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K63	B	1	67	63.2	62.2	1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K64	B	1	67	63.1	62.2	0.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K65	B	1	67	63.1	62.1	1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K66	B	1	67	63	62.2	0.8	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K67	B	1	67	63	62.1	0.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K68	B	1	67	61.4	61.4	0	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K69	B	1	67	62	61.6	0.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K70	B	1	67	59.5	59.4	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K71	B	1	67	60.3	60.4	-0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K72	B	1	67	43.3	43.1	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K73	B	1	67	43	42.5	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K74	B	1	67	43.1	42.7	0.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K75	B	1	67	44.1	43.8	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K76	B	1	67	46	45.8	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K77	B	1	67	49.1	49.1	0	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K78	B	1	67	43.2	43	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K79	B	1	67	43.9	43.7	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K80	B	1	67	44.1	43.9	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K81	B	1	67	45	44.9	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K82	B	1	67	45.8	45.7	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K83	B	1	67	49.4	49.3	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K84	B	1	67	42.5	41.8	0.7	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K85	B	1	67	42.8	42.3	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K86	B	1	67	42.8	42.4	0.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K87	B	1	67	43	42.7	0.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K88	B	1	67	44.1	43.9	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K89	B	1	67	46.5	46.4	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K90	B	1	67	43.7	43.2	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K91	B	1	67	44.7	44.5	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K92	B	1	67	46.7	46.6	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K93	B	1	67	45	44.9	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K94	B	1	67	45.4	45.3	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K95	B	1	67	47.9	47.9	0	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K96	B	1	67	44.9	43.5	1.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K97	B	1	67	44.4	43.5	0.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K98	B	1	67	44.1	43.7	0.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K99	B	1	67	44.3	44.1	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K100	B	1	67	45.5	45.3	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K101	B	1	67	50.7	50.7	0	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K102	B	1	67	43.3	41.8	1.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K103	B	1	67	43	41.8	1.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K104	B	1	67	42.7	41.9	0.8	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K105	B	1	67	43.2	42.7	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K106	B	1	67	44.8	44.6	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K107	B	1	67	49	48.9	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K108	B	1	67	40	38.9	1.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K109	B	1	67	40	39	1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K110	B	1	67	39.7	39.1	0.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K111	B	1	67	40.6	40.1	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K112	B	1	67	42.9	42.7	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K113	B	1	67	49.3	49.2	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K114	B	1	67	39.8	38.6	1.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K115	B	1	67	40.1	39.2	0.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K116	B	1	67	40.6	40	0.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K117	B	1	67	42.4	41.9	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K118	B	1	67	44.8	44.7	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K119	B	1	67	48.8	48.8	0	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K120	B	1	67	41.1	39.2	1.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K121	B	1	67	41.4	39.8	1.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K122	B	1	67	41.5	40.1	1.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K123	B	1	67	41.5	40.6	0.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K124	B	1	67	42.5	41.9	0.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K125	B	1	67	46.4	46.2	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K126	B	1	67	41.6	40.5	1.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K127	B	1	67	41.9	40.1	1.8	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K128	B	1	67	40.4	39.2	1.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K129	B	1	67	41.1	40.2	0.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K130	B	1	67	43.3	42.9	0.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K131	B	1	67	47.5	47.3	0.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K132	B	1	67	44.3	40.8	3.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K133	B	1	67	43.1	39.9	3.2	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K134	B	1	67	41.4	38.5	2.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K135	B	1	67	41.8	39.7	2.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K136	B	1	67	41.9	40.5	1.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K137	B	1	67	45.2	44.7	0.5	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K138	B	1	67	44.2	40.3	3.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K139	B	1	67	42	38.6	3.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K140	B	1	67	41.2	38.8	2.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K141	B	1	67	41.5	40.1	1.4	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K142	B	1	67	43.8	43.2	0.6	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K143	B	1	67	43	39.7	3.3	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K144	B	1	67	40.3	38.2	2.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K145	B	1	67	39.7	37.8	1.9	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	K146	B	1	67	39.3	37.5	1.8	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK1	C	1	67	64.8	54	10.8	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK2	C	1	67	64.1	53.6	10.5	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK3	C	1	67	63.9	54.2	9.7	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK4	C	1	67	64	63.9	0.1	0	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK5	C	1	67	64	53.7	10.3	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK6	C	1	67	64.2	53.9	10.3	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK7	C	1	67	64.2	53.8	10.4	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
Wall TKb	TK8	C	1	67	63.9	53.5	10.4	1	16	Yes	Yes	8	1960	15680	564480	35280	Propose to Construct
6ft height																	
Wall TKb	K1	B	1	67	60	58.9	1.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K2	B	1	67	57.9	51.5	6.4	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K3	B	1	67	52.3	49.5	2.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal

													Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K4	B	1	67	54.6	51.5	3.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K5	B	1	67	54.8	51.4	3.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K6	B	1	67	50.4	47.9	2.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K7	B	1	67	52.1	49.3	2.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K8	B	1	67	49.6	47.8	1.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K9	B	1	67	60.6	57	3.6	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K10	B	1	67	52.3	47.5	4.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K11	B	1	67	60.4	53.9	6.5	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K12	G	1	67	58.6	51.8	6.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K13	B	1	67	58.8	51.9	6.9	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K14	B	1	67	58.7	51.9	6.8	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K15	B	1	67	58.8	52	6.8	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K16	B	1	67	58.5	51.7	6.8	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K17	B	1	67	57.8	52.1	5.7	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K18	B	1	67	54.9	52.4	2.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K19	B	1	67	55	52.5	2.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K20	B	1	67	52.2	49	3.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K21	B	1	67	62	61.6	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K22	B	1	67	61.1	60.8	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K23	B	1	67	44.4	44.3	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K24	B	1	67	41.2	41.2	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K25	B	1	67	44.9	44.1	0.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K26	B	1	67	44.8	43.3	1.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K27	B	1	67	46.9	45.7	1.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K28	B	1	67	48.3	45.8	2.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K29	B	1	67	48.7	45.7	3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K30	B	1	67	35.1	35	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K31	B	1	67	39.9	39.3	0.6	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K32	B	1	67	45.2	44	1.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K33	B	1	67	45.3	42.6	2.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K34	B	1	67	47.5	44.8	2.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K35	B	1	67	49.6	45.5	4.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K36	B	1	67	49.1	45.8	3.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K37	B	1	67	62.4	62.1	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K38	B	1	67	62.3	62	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K39	B	1	67	62.1	62	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K40	B	1	67	62.8	62.6	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K41	B	1	67	43.9	43.7	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K42	B	1	67	43.4	43.1	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K43	B	1	67	43.7	42.8	0.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K44	B	1	67	46.5	45.4	1.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K45	B	1	67	44.5	43.8	0.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K46	B	1	67	46.9	45	1.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K47	B	1	67	45.6	44.4	1.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K48	B	1	67	45.3	43.5	1.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K49	B	1	67	43.7	42.4	1.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K50	B	1	67	40.4	39.9	0.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K51	B	1	67	41.6	40.6	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K52	B	1	67	40.7	39.7	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K53	B	1	67	44.4	41.5	2.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K54	B	1	67	41.2	38.1	3.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K55	B	1	67	39.9	38.1	1.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K56	B	1	67	41	39	2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K57	B	1	67	48	43.7	4.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K58	B	1	67	45.9	42	3.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K59	B	1	67	46.4	42.3	4.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K60	B	1	67	46.5	42.1	4.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K61	B	1	67	45.9	41.8	4.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K62	B	1	67	63.2	62.2	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K63	B	1	67	63.2	62.2	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K64	B	1	67	63.1	62.2	0.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K65	B	1	67	63.1	62.1	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K66	B	1	67	63	62.2	0.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K67	B	1	67	63	62.1	0.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K68	B	1	67	61.4	61.4	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K69	B	1	67	62	61.6	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal

													Noise Level Comparison			
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K70	B	1	67	59.5	59.4	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K71	B	1	67	60.3	60.4	-0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K72	B	1	67	43.3	43.1	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K73	B	1	67	43	42.6	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K74	B	1	67	43.1	42.8	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K75	B	1	67	44.1	43.9	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K76	B	1	67	46	45.8	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K77	B	1	67	49.1	49.1	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K78	B	1	67	43.2	43	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K79	B	1	67	43.9	43.7	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K80	B	1	67	44.1	44	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K81	B	1	67	45	44.9	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K82	B	1	67	45.8	45.8	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K83	B	1	67	49.4	49.4	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K84	B	1	67	42.5	41.9	0.6	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K85	B	1	67	42.8	42.4	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K86	B	1	67	42.8	42.5	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K87	B	1	67	43	42.8	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K88	B	1	67	44.1	43.9	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K89	B	1	67	46.5	46.4	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K90	B	1	67	43.7	43.2	0.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K91	B	1	67	44.7	44.5	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K92	B	1	67	46.7	46.6	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K93	B	1	67	45	44.9	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K94	B	1	67	45.4	45.3	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K95	B	1	67	47.9	47.9	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K96	B	1	67	44.9	43.6	1.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K97	B	1	67	44.4	43.5	0.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K98	B	1	67	44.1	43.8	0.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K99	B	1	67	44.3	44.1	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K100	B	1	67	45.5	45.3	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K101	B	1	67	50.7	50.7	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K102	B	1	67	43.3	41.9	1.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K103	B	1	67	43	42	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K104	B	1	67	42.7	42	0.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K105	B	1	67	43.2	42.8	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K106	B	1	67	44.8	44.6	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K107	B	1	67	49	48.9	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K108	B	1	67	40	39.1	0.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K109	B	1	67	40	39.1	0.9	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K110	B	1	67	39.7	39.1	0.6	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K111	B	1	67	40.6	40.2	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K112	B	1	67	42.9	42.7	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K113	B	1	67	49.3	49.2	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K114	B	1	67	39.8	38.8	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K115	B	1	67	40.1	39.3	0.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K116	B	1	67	40.6	40.1	0.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K117	B	1	67	42.4	41.9	0.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K118	B	1	67	44.8	44.7	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K119	B	1	67	48.8	48.8	0	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K120	B	1	67	41.1	39.4	1.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K121	B	1	67	41.4	39.9	1.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K122	B	1	67	41.5	40.2	1.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K123	B	1	67	41.5	40.7	0.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K124	B	1	67	42.5	42	0.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K125	B	1	67	46.4	46.2	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K126	B	1	67	41.6	40.6	1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K127	B	1	67	41.9	40.2	1.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K128	B	1	67	40.4	39.3	1.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K129	B	1	67	41.1	40.3	0.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K130	B	1	67	43.3	42.9	0.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K131	B	1	67	47.5	47.3	0.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K132	B	1	67	44.3	40.9	3.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K133	B	1	67	43.1	40	3.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K134	B	1	67	41.4	38.6	2.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K135	B	1	67	41.8	39.7	2.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall TKb	K136	B	1	67	41.9	40.5	1.4	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K137	B	1	67	45.2	44.7	0.5	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K138	B	1	67	44.2	40.4	3.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K139	B	1	67	42	38.7	3.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K140	B	1	67	41.2	38.9	2.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K141	B	1	67	41.5	40.2	1.3	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K142	B	1	67	43.8	43.2	0.6	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K143	B	1	67	43	39.8	3.2	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K144	B	1	67	40.3	38.2	2.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K145	B	1	67	39.7	37.9	1.8	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	K146	B	1	67	39.3	37.6	1.7	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK1	C	1	67	64.8	64.2	0.6	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK2	C	1	67	64.1	57.4	6.7	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK3	C	1	67	63.9	57.1	6.8	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK4	C	1	67	64	63.9	0.1	0	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK5	C	1	67	64	57.8	6.2	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK6	C	1	67	64.2	57.7	6.5	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK7	C	1	67	64.2	57.8	6.4	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal
Wall TKb	TK8	C	1	67	63.9	57.7	6.2	1	14	Yes	No	6	1960	11760	423360	N/A	Does Not Meet Noise Reduction Design Goal

Table B-22: Wall I1 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall I1	I5	G	1	-	47.2	47	0.2	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.7	0.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I10	G	14	-	55.4	44.3	11.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I11	B	1	67	54.8	43.2	11.6	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I12	B	1	67	55.7	43.7	12	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I13	B	1	67	54	44.6	9.4	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I14	B	1	67	50.1	41.4	8.7	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I15	B	1	67	43.5	38.1	5.4	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I16	G	9	-	48.9	46.8	2.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I17	B	1	67	47.9	42.2	5.7	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I18	B	1	67	48.1	42.6	5.5	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I19	G	1	-	49	44.5	4.5	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I20	B	1	67	46.2	41.1	5.1	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I21	G	8	-	46.5	44.7	1.8	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I22	B	1	67	45.3	40.7	4.6	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I23	B	1	67	44.3	39.5	4.8	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I24	B	1	67	43.3	39.6	3.7	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I25	G	1	-	43.8	41.4	2.4	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I26	B	1	67	51.5	40.8	10.7	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	35.9	0.9	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	34.5	0.9	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	33.3	1.2	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	34.3	1.2	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	39.9	2.7	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
15ft height																	
Wall I1	I5	G	1	-	47.2	47	0.2	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.8	0	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I10	G	14	-	55.4	45.2	10.2	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I11	B	1	67	54.8	44.5	10.3	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I12	B	1	67	55.7	45	10.7	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I13	B	1	67	54	45.5	8.5	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I14	B	1	67	50.1	42.4	7.7	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I15	B	1	67	43.5	38.8	4.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall I1	I16	G	9	-	48.9	47	1.9	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I17	B	1	67	47.9	42.6	5.3	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I18	B	1	67	48.1	43	5.1	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I19	G	1	-	49	44.8	4.2	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I20	B	1	67	46.2	41.5	4.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I21	G	8	-	46.5	44.8	1.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I22	B	1	67	45.3	41	4.3	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I23	B	1	67	44.3	39.9	4.4	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I24	B	1	67	43.3	40	3.3	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I25	G	1	-	43.8	41.7	2.1	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I26	B	1	67	51.5	42.5	9	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	36	0.8	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	34.7	0.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	33.6	0.9	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	34.6	0.9	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	40.3	2.3	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
10ft height																	
Wall I1	I5	G	1	-	47.2	47.1	0.1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.8	0	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I10	G	14	-	55.4	46.8	8.6	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I11	B	1	67	54.8	46.5	8.3	1	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I12	B	1	67	55.7	47	8.7	1	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I13	B	1	67	54	47.5	6.5	1	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I14	B	1	67	50.1	46.5	3.6	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I15	B	1	67	43.5	41.6	1.9	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I16	G	9	-	48.9	47.6	1.3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I17	B	1	67	47.9	44.9	3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I18	B	1	67	48.1	45.1	3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I19	G	1	-	49	46.3	2.7	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I20	B	1	67	46.2	44	2.2	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I21	G	8	-	46.5	45.5	1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I22	B	1	67	45.3	43.1	2.2	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I23	B	1	67	44.3	42.3	2	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I24	B	1	67	43.3	41.8	1.5	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I25	G	1	-	43.8	43	0.8	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I26	B	1	67	51.5	47.1	4.4	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	36.4	0.4	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	35.1	0.3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	34.1	0.4	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	35.2	0.3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	41.7	0.9	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
8ft height																	
Wall I1	I5	G	1	-	47.2	47.1	0.1	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.8	0	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I10	G	14	-	55.4	47.5	7.9	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I11	B	1	67	54.8	47.6	7.2	1	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I12	B	1	67	55.7	48.1	7.6	1	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I13	B	1	67	54	49.7	4.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I14	B	1	67	50.1	46.7	3.4	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I15	B	1	67	43.5	41.8	1.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I16	G	9	-	48.9	47.7	1.2	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I17	B	1	67	47.9	45.2	2.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I18	B	1	67	48.1	45.4	2.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I19	G	1	-	49	46.6	2.4	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I20	B	1	67	46.2	44.3	1.9	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I21	G	8	-	46.5	45.6	0.9	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I22	B	1	67	45.3	43.3	2	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I23	B	1	67	44.3	42.5	1.8	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I24	B	1	67	43.3	42	1.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I25	G	1	-	43.8	43.2	0.6	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall I1	I26	B	1	67	51.5	47.8	3.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	36.5	0.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	35.2	0.2	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	34.2	0.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	35.2	0.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	41.8	0.8	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
										6ft height							
Wall I1	I5	G	1	-	47.2	47.1	0.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I8	G	1	-	56.2	56.2	0	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I9	G	10	-	56.8	56.8	0	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I10	G	14	-	55.4	48.6	6.8	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I11	B	1	67	54.8	49	5.8	1	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I12	B	1	67	55.7	49.4	6.3	1	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I13	B	1	67	54	50	4	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I14	B	1	67	50.1	47.1	3	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I15	B	1	67	43.5	41.9	1.6	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I16	G	9	-	48.9	47.8	1.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I17	B	1	67	47.9	45.5	2.4	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I18	B	1	67	48.1	45.6	2.5	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I19	G	1	-	49	46.8	2.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I20	B	1	67	46.2	44.5	1.7	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I21	G	8	-	46.5	45.6	0.9	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I22	B	1	67	45.3	43.5	1.8	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I23	B	1	67	44.3	42.7	1.6	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I24	B	1	67	43.3	42.2	1.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I25	G	1	-	43.8	43.3	0.5	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I26	B	1	67	51.5	49	2.5	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA1	C	1	67	36.8	36.5	0.3	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA2	C	1	67	35.4	35.2	0.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA3	C	1	67	34.5	34.3	0.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA4	C	1	67	35.5	35.3	0.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA5	C	1	67	42.6	41.9	0.7	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal

Table B-23: Wall I2 - Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
All Wall I2										20ft height			All 1120		$806,400	$89,600	
Wall I1	I5	G	1	-	47.2	47	0.2	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.7	0.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I10	G	14	-	55.4	44.3	11.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I11	B	1	67	54.8	43.2	11.6	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I12	B	1	67	55.7	43.7	12	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I13	B	1	67	54	44.6	9.4	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I14	B	1	67	50.1	41.4	8.7	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I15	B	1	67	43.5	38.1	5.4	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I16	G	9	-	48.9	46.8	2.1	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I17	B	1	67	47.9	42.2	5.7	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I18	B	1	67	48.1	42.6	5.5	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I19	G	1	-	49	44.5	4.5	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I20	B	1	67	46.2	41.1	5.1	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I21	G	8	-	46.5	44.7	1.8	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I22	B	1	67	45.3	40.7	4.6	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I23	B	1	67	44.3	39.5	4.8	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I24	B	1	67	43.3	39.6	3.7	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I25	G	1	-	43.8	41.4	2.4	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	I26	B	1	67	51.5	40.8	10.7	1	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	35.9	0.9	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	34.5	0.9	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall I1	IA3	C	1	67	34.5	33.3	1.2	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	34.3	1.2	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	39.9	2.7	0	9	Yes	Yes	20	1460	29200	1051200	116800	Not Cost Effective
										15ft height					$604,800	$86,400	
Wall I1	I5	G	1	-	47.2	47	0.2	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.8	0	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I10	G	14	-	55.4	45.2	10.2	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I11	B	1	67	54.8	44.5	10.3	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I12	B	1	67	55.7	45	10.7	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I13	B	1	67	54	45.5	8.5	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I14	B	1	67	50.1	42.4	7.7	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I15	B	1	67	43.5	38.8	4.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I16	G	9	-	48.9	47	1.9	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I17	B	1	67	47.9	42.6	5.3	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I18	B	1	67	48.1	43	5.1	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I19	G	1	-	49	44.8	4.2	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I20	B	1	67	46.2	41.5	4.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I21	G	8	-	46.5	44.8	1.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I22	B	1	67	45.3	41	4.3	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I23	B	1	67	44.3	39.9	4.4	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I24	B	1	67	43.3	40	3.3	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I25	G	1	-	43.8	41.7	2.1	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	I26	B	1	67	51.5	42.5	9	1	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	36	0.8	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	34.7	0.7	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	33.6	0.9	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	34.6	0.9	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	40.3	2.3	0	7	Yes	Yes	15	1460	21900	788400	112628.5714	Not Cost Effective
										10ft height					$403,200	$134,400	
Wall I1	I5	G	1	-	47.2	47.1	0.1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.8	0	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I10	G	14	-	55.4	46.8	8.6	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I11	B	1	67	54.8	46.5	8.3	1	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I12	B	1	67	55.7	47	8.7	1	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I13	B	1	67	54	47.5	6.5	1	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I14	B	1	67	50.1	46.5	3.6	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I15	B	1	67	43.5	41.6	1.9	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I16	G	9	-	48.9	47.6	1.3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I17	B	1	67	47.9	44.9	3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I18	B	1	67	48.1	45.1	3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I19	G	1	-	49	46.3	2.7	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I20	B	1	67	46.2	44	2.2	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I21	G	8	-	46.5	45.5	1	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I22	B	1	67	45.3	43.1	2.2	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I23	B	1	67	44.3	42.3	2	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I24	B	1	67	43.3	41.8	1.5	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I25	G	1	-	43.8	43	0.8	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	I26	B	1	67	51.5	47.1	4.4	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	36.4	0.4	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	35.1	0.3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	34.1	0.4	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	35.2	0.3	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	41.7	0.9	0	3	Yes	Yes	10	1460	14600	525600	175200	Not Cost Effective

														Noise Level Comparison		
												XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
8ft height														$322,560	$161,280	
Wall I1	I5	G	1	-	47.2	47.1	0.1	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I8	G	1	-	56.2	56.2	0	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I9	G	10	-	56.8	56.8	0	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I10	G	14	-	55.4	47.5	7.9	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I11	B	1	67	54.8	47.6	7.2	1	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I12	B	1	67	55.7	48.1	7.6	1	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I13	B	1	67	54	49.7	4.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I14	B	1	67	50.1	46.7	3.4	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I15	B	1	67	43.5	41.8	1.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I16	G	9	-	48.9	47.7	1.2	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I17	B	1	67	47.9	45.2	2.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I18	B	1	67	48.1	45.4	2.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I19	G	1	-	49	46.6	2.4	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I20	B	1	67	46.2	44.3	1.9	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I21	G	8	-	46.5	45.6	0.9	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I22	B	1	67	45.3	43.3	2	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I23	B	1	67	44.3	42.5	1.8	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I24	B	1	67	43.3	42	1.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I25	G	1	-	43.8	43.2	0.6	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	I26	B	1	67	51.5	47.8	3.7	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA1	C	1	67	36.8	36.5	0.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA2	C	1	67	35.4	35.2	0.2	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA3	C	1	67	34.5	34.2	0.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA4	C	1	67	35.5	35.2	0.3	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
Wall I1	IA5	C	1	67	42.6	41.8	0.8	0	2	Yes	Yes	8	1460	11680	420480	210240	Not Cost Effective
6ft height														$241,920		
Wall I1	I5	G	1	-	47.2	47.1	0.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I6	G	1	-	48.9	48.8	0.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I7	G	3	-	50.9	50.8	0.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I8	G	1	-	56.2	56.2	0	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I9	G	10	-	56.8	56.8	0	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I10	G	14	-	55.4	48.6	6.8	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I11	B	1	67	54.8	49	5.8	1	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I12	B	1	67	55.7	49.4	6.3	1	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I13	B	1	67	54	50	4	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I14	B	1	67	50.1	47.1	3	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I15	B	1	67	43.5	41.9	1.6	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I16	G	9	-	48.9	47.8	1.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I17	B	1	67	47.9	45.5	2.4	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I18	B	1	67	48.1	45.6	2.5	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I19	G	1	-	49	46.8	2.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I20	B	1	67	46.2	44.5	1.7	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I21	G	8	-	46.5	45.6	0.9	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I22	B	1	67	45.3	43.5	1.8	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I23	B	1	67	44.3	42.7	1.6	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I24	B	1	67	43.3	42.2	1.1	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I25	G	1	-	43.8	43.3	0.5	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	I26	B	1	67	51.5	49	2.5	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA1	C	1	67	36.8	36.5	0.3	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA2	C	1	67	35.4	35.2	0.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA3	C	1	67	34.5	34.3	0.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA4	C	1	67	35.5	35.3	0.2	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal
Wall I1	IA5	C	1	67	42.6	41.9	0.7	0	2	Yes	No	6	1460	8760	315360	N/A	Does Not Meet Noise Reduction Design Goal

APPENDIX C – NOISE STUDY FIELD MEASUREMENTS

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings

Time:	**Fast**	Slow	Name:	MP01
Weighting:	Lin.	**A**	Date:	10/10/2023
Mic. Setting:	Fr.	**Rnd**	Project Name:	East Side Corridor
			Project Number:	

Sound Level Meter (SLM)

Manufacturer	Casella
Model	CEL-633
Serial No.	1239532
Microphone	CEL-251

Calibrator

Manufacturer	Casella
Model	CEL Acousti Calibratory Type 1
Serial No.	966247
Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration	114.9 dB	Time	
Final Calibration	114 dB	Time	

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 425723.4755 Y = 184712.5089

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION

Test Number	1	2	3	4	
Date	10/10/2023				
Start Time	2:07:00 PM				
End Time	2:30 PM				
Elapsed Time	23 MIN				
Weather	9				
Temp (^{o}F)	55				
Rel. Humidity (%)	43				
Wind (mph)	9				
Wind direction	SE				
Road conditions	Low Traffic	`			

TRAFFIC

Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)

Test Number	1	2	3	4	
L10	51.5				
L90	39.0				
Leq	63.7				

(1) Several loud trucks near monitor location. SE 18TH ST CLOSED - no thru traffic. Light construction work >500' away. Highway >10

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings

Time:	**Fast**	Slow	Name:	MP02
Weighting:	Lin.	**A**	Date:	10/11/2023
Mic. Setting:	Fr.	**Rnd**	Project Name:	East Side Corridor
			Project Number:	

Sound Level Meter (SLM)

Manufacturer	Casella
Model	CEL-633
Serial No.	1239532
Microphone	CEL-251

Calibrator

Manufacturer	Casella
Model	CEL Acousti Calibratory Type 1
Serial No.	966247
Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration		Time	10:27 AM
Final Calibration		Time	10:27 AM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 431491.0739 Y = 184657.8042

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION

Test Number	1	2	3	4	
Date					
Start Time	10:48:00 AM				
End Time					
Elapsed Time	10 MIN				
Weather	Sunny, no clouds, low wind				
Temp (^{o}F)	53				
Rel. Humidity (%)	43				
Wind (mph)	7				
Wind direction	NW				
Road conditions	Low traffic				

TRAFFIC

Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)

Test Number	1	2	3	4	
L10	51.5				
L90	38.5				
Leq	53.4				

Loud birds near monitor equipment mid way through monitor duration. SE 18th St closed at Bixby Ave - No thru traffic. Did 10 min

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings

Time:	**Fast**	Slow	Name:	MP03
Weighting:	Lin.	**A**	Date:	10/11/2023
Mic. Setting:	Fr.	**Rnd**	Project Name:	East Side Corridor
			Project Number:	

Sound Level Meter (SLM)

Manufacturer	Casella
Model	CEL-633
Serial No.	1239532
Microphone	CEL-251

Calibrator

Manufacturer	Casella
Model	CEL Acousti Calibratory Type 1
Serial No.	966247
Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration		Time	10:27 AM
Final Calibration		Time	10:27 AM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 430125.1826 Y = 190032.1653

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION

Test Number	1	2	3	4	
Date					
Start Time	11:55:00 AM				
End Time					
Elapsed Time	10 min				
Weather					
Temp (^{o}F)	57				
Rel. Humidity (%)	34				
Wind (mph)	7				
Wind direction	nw				
Road conditions		`			

TRAFFIC

Test Number	1	2	3	4	
Autos	1				
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)

Test Number	1	2	3	4	
L10	45.5				
L90	39.0				
Leq	43.2				

No traffic during moniotring. Road closed to through traffic. Did 10 min run based on no ambient noise source (no traffic near monitc

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings

Time:	**Fast**	Slow	Name:	MP04
Weighting:	Lin.	**A**	Date:	10/10/2023
Mic. Setting:	Fr.	**Rnd**	Project Name:	East Side Corridor
			Project Number:	

Sound Level Meter (SLM)

Manufacturer	Casella
Model	CEL-633
Serial No.	1239532
Microphone	CEL-251

Calibrator

Manufacturer	Casella
Model	CEL Acousti Calibratory Type 1
Serial No.	966247
Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration	93.3	Time	1:48 PM
Final Calibration	94	Time	1:48 PM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 430416.2835 Y = 193803.9588

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION

Test Number	1	2	3	4	
Date	10/10/2023				
Start Time	3:18:00 PM	3:25 PM			
End Time					
Elapsed Time	7 min	12 min			
Weather	9				
Temp (^{o}F)	55				
Rel. Humidity (%)	43				
Wind (mph)	9				
Wind direction	SE				
Road conditions	Low Traffic	`			

TRAFFIC

Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)

Test Number	1 (1)	2	3	4	
L10	48	44.0			
L90	31.5	31.0			
Leq	49.4	47.8			

(1) First run, stopped based on a resident coming to talk. Second run, stopped based on adjacent barking dog.

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP05
Time:	**Fast**	Slow	Date:	10/10/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**		
Manufacturer	Casella	Manufacturer	Casella	
Model	CEL-633	Model	CEL Acousti Calibratory Type 1	
Serial No.	1239532	Serial No.	966247	
Microphone	CEL-251	Calibrator Frequency (Hz)		1,000

Calibration

Initial Calibration	93.3	Time	1:48 PM
Final Calibration	94	Time	1:48 PM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 430404.553 Y = 194516.5957

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date	10/10/2023				
Start Time	2:53:00 PM				
End Time					
Elapsed Time	15min				
Weather	9				
Temp (^{o}F)	55				
Rel. Humidity (%)	43				
Wind (mph)	9				
Wind direction	SE				
Road conditions	Low Traffic	`			

TRAFFIC					
Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	38.5				
L90	30.0				
Leq	39.4				

(1) No noise. Placed on one house south of original MP05 location. Stopped run due to barking dog (~30 sec).

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings

Time:	**Fast**	Slow	
Weighting:	Lin.	**A**	
Mic. Setting:	Fr.	**Rnd**	

Name:	MP06A
Date:	10/10/2023
Project Name:	East Side Corridor
Project Number:	

Sound Level Meter (SLM)

Manufacturer	Casella
Model	CEL-633
Serial No.	1239532
Microphone	CEL-251

Calibrator

Manufacturer	Casella
Model	CEL Acousti Calibratory Type 1
Serial No.	966247
Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration	93.3	Time	1:48 PM
Final Calibration	94	Time	1:48 PM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 430668.512 Y = 198089.096

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION

Test Number	1	2	3	4	
Date	10/10/2023				
Start Time	4:03:00 PM				
End Time	21 min				
Elapsed Time					
Weather	9				
Temp (^{o}F)	55				
Rel. Humidity (%)	44				
Wind (mph)	8				
Wind direction	SE				
Road conditions	Low Traffic	`			

TRAFFIC

Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)

Test Number	1	2	3	4	
L10	51.0				
L90	36.0				
Leq	47.3				

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP07
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**		
Manufacturer	Casella	Manufacturer	Casella	
Model	CEL-633	Model	CEL Acousti Calibratory Type 1	
Serial No.	1239532	Serial No.	966247	
Microphone	CEL-251	Calibrator Frequency (Hz)		1,000

Calibration

Initial Calibration	95.2	Time	12:26 PM
Final Calibration	94	Time	12:26 PM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 431480.4608 Y = 200660.6487

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	12:25 PM				
End Time					
Elapsed Time	10 min				
Weather	SUNNY				
Temp (^{o}F)	59				
Rel. Humidity (%)					
Wind (mph)	7				
Wind direction					
Road conditions	Dead end, no thru traffic.				

TRAFFIC					
Test Number	1	2	3	4	
Autos	0				
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	44.0				
L90	41.5				
Leq	42.9				

Moved to parralel to farmyard residential receptor. Did 10 min run based on no ambient noise source (no traffic near monitor point

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP08
Time:	**Fast**	Slow	Date:	10/10/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**	
Manufacturer	Casella	Manufacturer	Casella
Model	CEL-633	Model	CEL Acousti Calibratory Type 1
Serial No.	1239532	Serial No.	966247
Microphone	CEL-251	Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration	93.3	Time	1:48 PM
Final Calibration	94	Time	1:48 PM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 429565.1867 Y = 200593.8499

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date	10/10/2023				
Start Time	4:33:00 PM				
End Time	21 min				
Elapsed Time					
Weather	9				
Temp (^{o}F)	55				
Rel. Humidity (%)	44				
Wind (mph)	8				
Wind direction	SE				
Road conditions	Low Traffic	`			

TRAFFIC					
Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	49.0				
L90	38.0				
Leq	45.7				

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP09
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**		
Manufacturer	Casella	Manufacturer	Casella	
Model	CEL-633	Model	CEL Acousti Calibratory Type 1	
Serial No.	1239532	Serial No.	966247	
Microphone	CEL-251	Calibrator Frequency (Hz)		1,000

Calibration

Initial Calibration	93.8	Time	1:22 PM
Final Calibration	94	Time	1:22 PM

Monitor Location and Terrain Conditions: GPS Coordinates: 1854 Evergreen Pl NE Backyard.

X= 428147.3918 Y = 200611.1828

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	1:24 PM				
End Time	1:44 PM				
Elapsed Time	20 MIN				
Weather	Sunny				
Temp (^{o}F)	61				
Rel. Humidity (%)	31				
Wind (mph)	8				
Wind direction	NW				
Road conditions	Low Traffic	`			

TRAFFIC					
Test Number	1	2	3	4	
Autos	3 ON EVERGREEN (15-20MPh)				
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	50.5				
L90	33.0				
Leq	48.4				

Dog barking for 5 sec at 1:27p. 4' Berm between resident backyard and 26th St. NE. Plane flying by at 1:31pm. Plane flew by at 1:40

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP11
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**	
Manufacturer	Casella	Manufacturer	Casella
Model	CEL-633	Model	CEL Acousti Calibratory Type 1
Serial No.	1239532	Serial No.	966247
Microphone	CEL-251	Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration	93.9	Time	1:53 PM
Final Calibration	94	Time	1:53 PM

Monitor Location and Terrain Conditions: GPS Coordinates: Mcklinley elementary school ball fields, near rafters (AFHU)

X= 424844.72 Y = 200565.85

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	1:55 PM				
End Time					
Elapsed Time	20 MIN				
Weather	Sunny				
Temp (^{o}F)	61				
Rel. Humidity (%)	35				
Wind (mph)	8				
Wind direction	NW				
Road conditions		`			

TRAFFIC					
Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	54.0				
L90	37.5				
Leq	52.2				

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP13
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**	
Manufacturer	Casella	Manufacturer	Casella
Model	CEL-633	Model	CEL Acousti Calibratory Type 1
Serial No.	1239532	Serial No.	966247
Microphone	CEL-251	Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration		Time	
Final Calibration		Time	

Monitor Location and Terrain Conditions: GPS Coordinates: Mcklinley elementary school ball fields, near rafters (AFHU)

X= 418068.9992 Y = 200598.5636

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	2:56 PM				
End Time	3:15 PM				
Elapsed Time	19 min				
Weather	Sunny				
Temp (^{o}F)	61				
Rel. Humidity (%)	35				
Wind (mph)	8				
Wind direction	NW				
Road conditions		`			

TRAFFIC					
Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	56.5				
L90	45.5				
Leq	55.1				

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP14
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**		
Manufacturer	Casella	Manufacturer	Casella	
Model	CEL-633	Model	CEL Acousti Calibratory Type 1	
Serial No.	1239532	Serial No.	966247	
Microphone	CEL-251	Calibrator Frequency (Hz)		1,000

Calibration

Initial Calibration	93.8	Time	12:42 PM
Final Calibration	94	Time	12:42 PM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 432634.6795 Y = 204460.9975

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	12:45 PM	12:58 PM			
End Time	12:57 PM	1:16 PM			
Elapsed Time	12 min	18 min			
Weather	Sunny				
Temp (^{o}F)	60	60			
Rel. Humidity (%)					
Wind (mph)	7				
Wind direction					
Road conditions	Dead end, no thru traffic.	、			

TRAFFIC					
Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10		48.5			
L90		29.5			
Leq	51.2	44.5			

(1) Plane flew by at 12:47 pm. Trash car pulled up at 12:55.

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP16
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**		
Manufacturer	Casella	Manufacturer	Casella	
Model	CEL-633	Model	CEL Acousti Calibratory Type 1	
Serial No.	1239532	Serial No.	966247	
Microphone	CEL-251	Calibrator Frequency (Hz)		1,000

Calibration

Initial Calibration	92.8	Time	10:27 AM
Final Calibration	94	Time	10:27 AM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 430058.6076 Y = 184792.5237

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	10:28:00 AM				
End Time					
Elapsed Time	11				
Weather					
Temp (^{o}F)					
Rel. Humidity (%)					
Wind (mph)					
Wind direction					
Road conditions		`			

TRAFFIC					
Test Number	1	2	3	4	
Autos	1				
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	49.0				
L90	44.5				
Leq	47.6				

Road closed to through traffic no traffic observed. Monitored to measure ambient sound. Did 11 min run based on no ambient nois

FIELD NOISE MEASUREMENT DATA SHEET

Sound Level Meter (SLM) Settings			Name:	MP17
Time:	**Fast**	Slow	Date:	10/11/2023
Weighting:	Lin.	**A**	Project Name:	East Side Corridor
Mic. Setting:	Fr.	**Rnd**	Project Number:	

Sound Level Meter (SLM)		**Calibrator**	
Manufacturer	Casella	Manufacturer	Casella
Model	CEL-633	Model	CEL Acousti Calibratory Type 1
Serial No.	1239532	Serial No.	966247
Microphone	CEL-251	Calibrator Frequency (Hz)	1,000

Calibration

Initial Calibration	92.8	Time	10:27 AM
Final Calibration	94	Time	10:27 AM

Monitor Location and Terrain Conditions: GPS Coordinates:

X= 429028.1908 Y = 188624.2191

Dominant and Observed Noise Sources:

MEASURMENT INFORMATION					
Test Number	1	2	3	4	
Date					
Start Time	11:06:00 AM				
End Time					
Elapsed Time	17				
Weather					
Temp (^{o}F)					
Rel. Humidity (%)					
Wind (mph)					
Wind direction					
Road conditions		`			

TRAFFIC					
Test Number	1	2	3	4	
Autos					
Med Trucks					
Heavy Trucks					
Buses					
Motorcycles					
Total					
Speed Limit					

MONITOR RESULTS (dBA)					
Test Number	1	2	3	4	
L10	50.0				
L90	40.0				
Leq	55.4				

Plane flying by at 11:17 AM. Ended moniter before 20 min based on residents talking nearby monitor equipment.

APPENDIX D – PROJECT LAYOUT

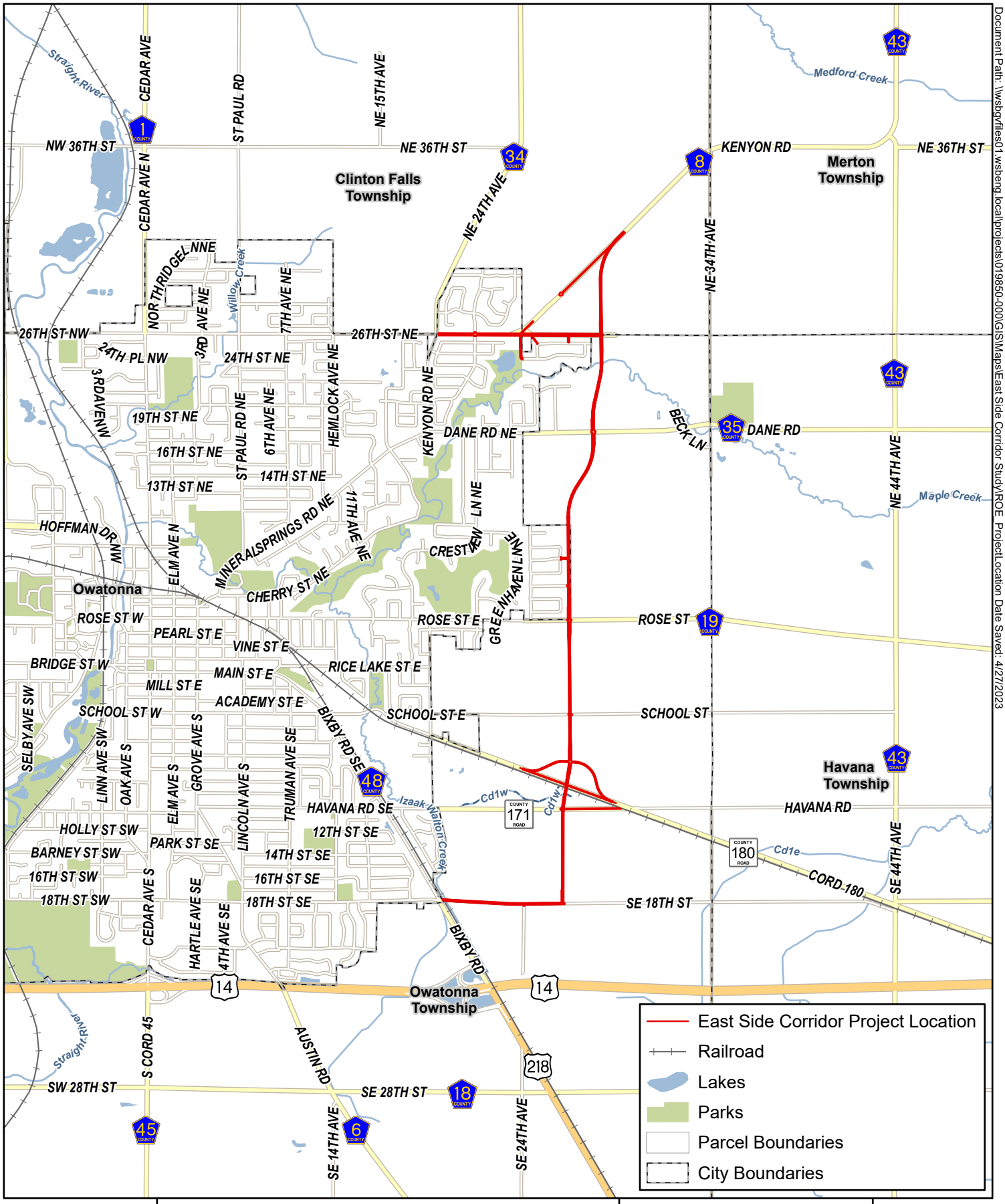

Figure 1 - Project Location

East Side Corridor Study
Steele County, Minnesota

N

0 3,600 Feet

1 inch = 3,600 Ft

wsb

Document Path: \\wsbgvfiles01.wsbeng.local\projects\019850-000\GIS\Maps\East Side Corridor Study\ROE ProjectLocation Date Saved: 4/27/2023

Gmail

Lyssa Lynn <lyssalynn13@gmail.com>

ESC Data Practices Requests / Status

Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> Mon, Dec 8, 2025 at 4:07 PM
To: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>, Matthew Sennott [redacted]
Lyssa Lynn [redacted]
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Housh, Campbell" <Campbell.Housh@steelecountymn.gov>

Dear Ms. Zimmerman and Mr. Sennott,

Thank you for your continued engagement regarding the East Side Corridor (ESC) data practices requests.

Re: Joint Transportation Committee

You are misinterpreting Minn. Stat. § 471.59. This statute does not require the county to enter into a joint exercise of powers; it allows the county to enter into agreements but does not require it to do so. Additionally, to my understanding, this committee exercises no authority or government powers. This committee has no formal agreement. It is no different than any other ad hoc committee. Therefore, the committee is not required and does not have minutes. While the Joint Transportation Committee is listed as a Joint Powers entity, Steele County is not the responsible authority for maintaining its records. We have confirmed that no records were created or received by the County in connection with this Committee. If records exist, they may be maintained by another participating entity. The County has not destroyed any such records, nor were any withheld.

Re: Noise Studies

Former county engineer Paul Sponholtz told us there were no formal noise studies. Regarding Ms. Fry's Testimony: Ms. Fry's statement during the ALJ proceeding accurately reflects the scope of the County's search. To the county's knowledge, Mr. Sponholz conducted a targeted search of the relevant drive where ESC-related project files are maintained. The county's position remains that no noise studies were conducted or received.

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Re :Commissioner Emails

Microsoft Purview now has an analytics tool that produced the attached summary for the "Commissioner ESC" data request. It includes a search of OneDrive as well as emails. As you can see, there are 5829 items, an unknown number of page(s) for each. I provided the columns FileClass, SubjectTitle, and Location. If you'd like to speed up the document request, I can certainly go through a specific item if you highlight them from this list. Otherwise, it is thousands of pages that likely contain irrelevant information but do fit your data request. **There are 336 items ready for review.** The estimated competition date is updated to January 2, 2026.

This and previously requested and responsive data remain available for viewing in accordance with Minn. Stat. § 13.03.

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Robert J. Jarrett

Data Practices Responsible Authority Steele County

Steele County Attorney

Direct: 507-444-7786

[Quoted text hidden]

Commissioner Emails ESC search results analytics summary.csv
1385K

Comment #55

DEPARTMENT OF NATURAL RESOURCES

Division of Ecological & Water Resources
Region 4 (South Region)
21371 Highway 15 South
New Ulm, MN 56073

December 18, 2025

Ronald Gaines
Steele County Public Works Facility
3000 Hoffman Drive NW
Owatonna, MN 55060
ronald.gaines@steelecountymn.gov

Subject: Owatonna East Side/29th Ave Corridor Environmental Assessment Worksheet

Ronald Gaines,

Thank you for the opportunity to provide comments on the Owatonna East Side/29th Ave Corridor Environmental Assessment Worksheet. The following includes recommendations and requirements for the proposed project.

Section 12. Water Resources

We look forward to working with you on the Public Waters Work Permit for the Maple Creek (M-048-026-006) crossing. Please review MN Administrative Rules 6115.0231 Subp. 2. for information regarding requirements for new crossings. For questions, contact:

> Todd Piepho, Area Hydrologist
> Todd.piepho@state.mn.us
> (507)421-1991

Section 14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

The Natural Heritage Review letter (MCE-2023-00220-02) states, "If this project will be impacting any native prairie habitat, a qualified surveyor will need to conduct a botanical survey in these areas." The proposed 29th Ave/East Side Corridor project will impact a railroad right-of-way that was designated an MBS Site of Moderate Biodiversity Significance (Hwy 14 ROW). This MBS Site contains a known prairie native plant community and occurrences of state-listed threatened plants. The current extent of these plant populations is unknown. Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and chapter 6134) prohibit the take of threatened or endangered species without a permit. To demonstrate avoidance of protected species, a habitat assessment or botanical survey is needed where the proposed project will impact the MBS Site along the Canadian Pacific/Kansas City Railroad. Areas within previously disturbed road rights-of-way are exempt from the requirement to avoid take. For questions regarding this process, contact Review.NHIS@state.mn.us .

It is recommended that seed mixes not include Smooth brome (Bromus inermis) and Sweet clover (Melilotus spp.)

Attachments:

- Standard Erosion Control and Invasive Species Prevention Best Practices

Regards,

Haley Byron

Digitally signed by Haley Byron
Date: 2025.12.18 09:03:49 -06'00'

Haley Byron
Regional Environmental Assessment Ecologist
haley.byron@state.mn.us
(507)389-8813

CC:

Theresa Ebbenga, Assistant Regional Manager
Todd Kolander, Southern District Manager
Todd Peipho, Area Hydrologist
Genevieve Brand, Assistant Regional Ecologist
Lisa Gelvin-Innvaer, Nongame Specialist

Equal Opportunity Employer

Standard Erosion Control and Invasive Species Prevention Best Practices

Take precautions when working near waterbodies to prevent sedimentation and erosion:

- Erodible surfaces should not be left exposed for greater than one day. For example, work should not commence late in the week if it will be left unfinished over a weekend.
- Work should not commence if rain is predicted.
- All wheeled or tracked construction equipment should be restricted to work areas above the stream bank.
- Fill material should not be stockpiled in the floodplain.
- Backfill placed below Ordinary High Water (OHW) should consist of clean granular material free of fines, silts, soils, and mud.
- Consult Best Practices for DNR General Public Waters Work Permit GP 2004-0001: Species Protection. Refer to pages: 3, 11, 14, 16, 25, 33, and 34 as relevant to a particular project.
- Vegetative "grout" is encouraged be incorporated with installed rip rap (see page 33 of above link). Revegetate disturbed soil with native species suitable to the local habitat as soon after construction as possible. In situations where soils/vegetation may not grow or survive due to hydraulics and/or rapidly changing water levels, an aggregate filled riprap is an acceptable alternative e.g. example MnDOT language: " Aggregate Surfacing to be placed on all riprapped areas and slopes above the Ordinary High Water Level (OHWL) to fill voids. Surface riprap with coarse filter aggregate in accordance with specification 3149.2H. Except in areas installed per Standard Plate 3133D unless otherwise required (e.g., required by DNR permit). "
- If directional boring is planned, bore pits should be placed away from the water's edge and effective erosion control employed to prevent excavation material from entering the water. Upon completion, pits should be filled, graded to preconstruction contours, and re-vegetated with native plant species,
- DNR Public Waters Work Permit may be required. Permit requirements must be followed.

Use wildlife friendly erosion control:

- Biodegradable netting should be used, preferably natural materials with short degradation periods. Erosion control blankets should be limited to bio-netting or natural netting types due to the risk of entanglement and death of small animals.
- Identify acceptable materials in Category 3N or 4N mulches. See Standard Specifications for Construction - MnDOT (state.mn.us) - most recent version
- Do not use products that require UV-light to degrade (also called "photodegradable"), as they do not degrade properly when covered/shaded.
- Do not use products containing plastic mesh netting or other plastic components.
- Do not use mulch products that contain synthetic (plastic) fiber additives near waterbodies.

Take active steps to prevent invasive species introduction and spread:

- Use only weed-free mulches, topsoils, fills, and seed mixes. Of particular concern are birdsfoot trefoil (Lotus corniculatus) and crown vetch (Coronilla varia), two invasive species that are sold commercially and are problematic in prairies and disturbed open areas.
- Inspect and clean all equipment (including but not limited to: vehicles, clothing, and gear) at a site prior to moving to another site. All soil, aggregate material, mulch, vegetation, seeds, animals, etc. need to be removed using a hand tool, brush, compressed air, pressure washer, or otherwise.
- If equipment is not cleaned before arriving to a work site, then clean the equipment in the parking or staging area, ensuring no material is deposited at the new site. Material cleaned from equipment should be disposed of legally.
- All equipment (including but not limited to: waders, tracked vehicles, barges, boats, turbidity curtain, sheet pile, and pumps) used for work in an "infested water" must be adequately decontaminated. See Watercraft Decontamination Manual for more information.
- See Come Clean, Leave Clean for more detailed guidance. This guidance is required for those working on DNR lands as part of grant or contract or are working under a permit, your grant, contract, or permit.
- Use only weed-free mulches, topsoils/fill, and seed mixes.

Additional Related Links

Best Practices for Meeting DNR General Public Waters Work Permit (see especially Chap. 1)
MN Board of Water & Soil Resources Seed Mixes
Invasive Species – MNDNR Contract, grant and permit requirements
Watercraft Decontamination Manual-MNDNR
MPCA Perimeter Control Guidance Factsheet
MPCA Sediment control practices - Perimeter controls for disturbed areas
Minnesota Guide for Stream Connectivity and Aquatic Organism Passage through Culverts

Comment 63A

From: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Sent: Thursday, December 18, 2025 12:53 PM
To: Tyrel Ian Alastair Hunter
Subject: Fwd: ESC Data Practices Requests / Status

Context for this email:

This email reflects the County's position that responsive data exists and will be available on January 2 — the next business day *after* the EAW public comment period closes. We still need to respond because there are significant issues with what is being represented as "available."

We are **not disputing that files exist**. The problem is that the materials provided so far are **not usable as data**. These emails were converted to `.txt` files that strip out formatting and content, resulting in documents that display one or two letters per line and are effectively unreadable. We also do not have access to Outlook or Microsoft Office to open native email files.

The County removed standard software and replaced it with third-party viewers that are insufficient for meaningful review. Emails frequently do not open, only one file can be viewed at a time, and email chains and attachments are not linked — making it impossible to follow conversations or verify completeness.

We have not returned to review what may have been reloaded onto the jump drive. The initial inspection required approximately **20 hours**, and due to the restrictions imposed at that time, we can not verify the integrity or completeness of the records. We do not have the capacity to repeat that process unless the EAW comment period is adjusted to allow meaningful review.

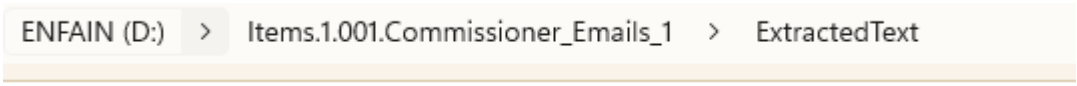
The "commissioner emails" referenced appear to be the **first batch of produced following the administrative ruling**, that was provided in the .txt format. As shown in the email chain below, the County is refusing to fulfill its obligation to obtain and provide the noise study materials and Joint Transportation Committee data, both of which are directly relevant to the EAW.

Let us know if you have any questions!

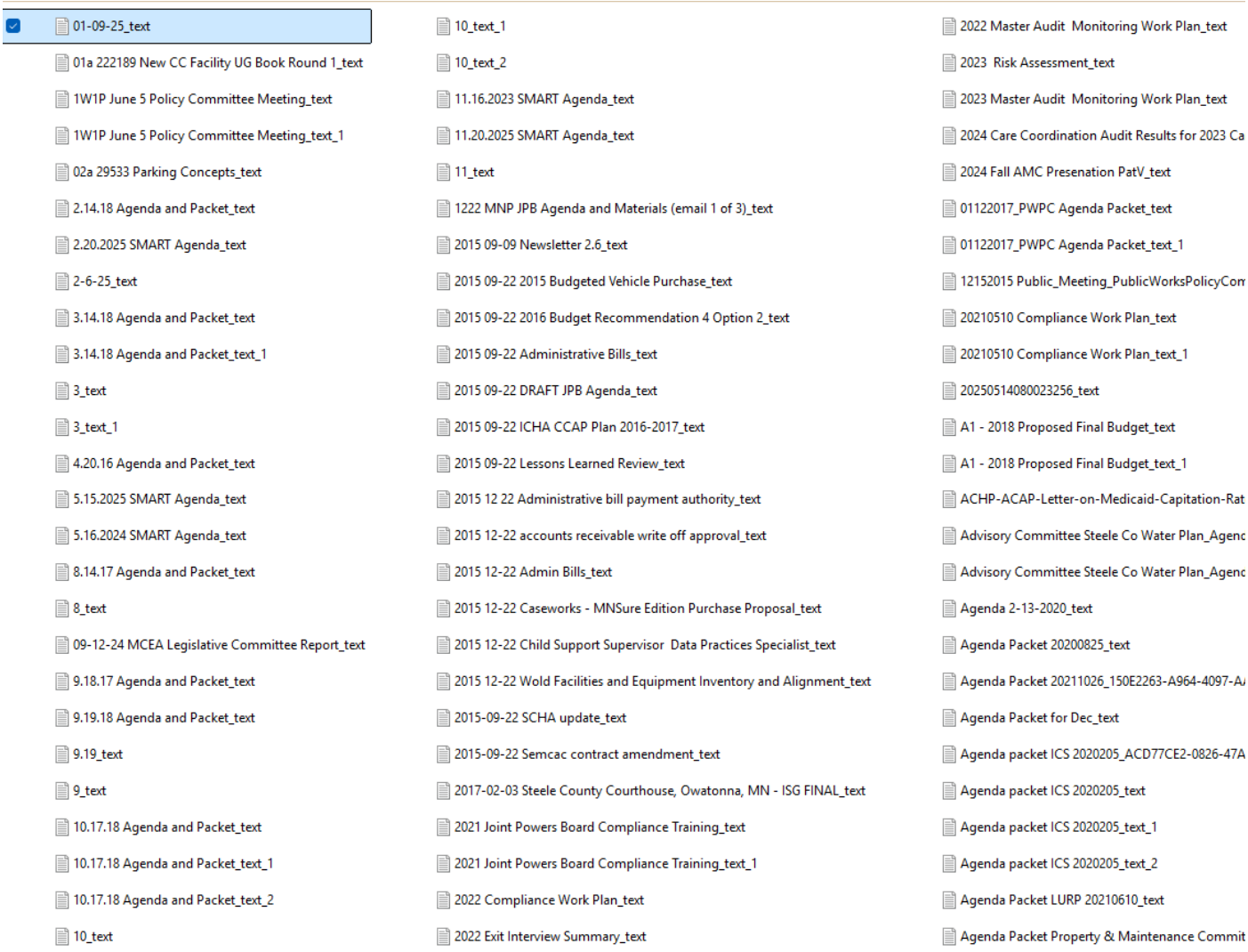
---------- Forwarded message ---------
From: **Jarrett, Robert** <robert.jarrett@steelecountymn.gov>
Date: Mon, Dec 15, 2025 at 4:53 PM
Subject: RE: ESC Data Practices Requests / Status
To: Lyssa Lynn <lyssalynn13@gmail.com>, Housh, Campbell <Campbell.Housh@steelecountymn.gov>, Matthew Sennott <matt.sennott@gmail.com>, Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>, Fry, Renae <Renae.Fry@steelecountymn.gov>

Good afternoon,

SCAO staff and I were able to view the items on the jump drives. Here is a clip from drive #4 from "commissioner emails". I removed the multiple folders and left only those that contained items.



Here is a clip of some of the items:



That folder alone contained 1,542 items. All text formats that were reviewable. Another option is to provide in a native format (like drives 1-3); however, the county does not have a non-licensed computer to give you to review all this data, so the option of free software is the only available option. The county is open to other ideas if you have them; however, we do not have time to sit with you to review this large amount of data.

The data drive 1 was redownloaded to ensure it was complete. A requester cannot manipulate data into folders; they can only review data.

Again, if there are specific items you are looking for the county can do a search more quickly than the broad request that we are currently working under. Please review the prior excel document I sent that had all the files listed.

As of today, December 15, 2025, there are 4 flash drives of data available for review during business hours.

Topic	**Sub request**	**Status**
All ESC Data	Large request – remains in progress overall, broken into smaller parts, and provided in waves.	*In progress* Estimated completion Feb 22, 2026.
	Emails – Paul & Greg to/from WSB	Completed & available **(Drives 1, 2,**
	Emails - county commissioners	*In progress* Estimated date: January 2, 2027 *1000+ items ready for review* ***(Drive***

Have a safe night,

Rob

Robert J. Jarrett

Steele County Attorney

Direct: 507-444-7786

From: Lyssa Lynn <lyssalynn13@gmail.com>
Sent: Tuesday, December 9, 2025 11:21 PM
To: Housh, Campbell <Campbell.Housh@steelecountymn.gov>; Jarrett, Robert <robert.jarrett@steelecountymn.gov>
Cc: Matthew Sennott <matt.sennott@gmail.com>; Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>; Abbe, Jim <Jim.Abbe@steelecountymn.gov>; Brady, James <James.Brady@steelecountymn.gov>; Glynn, John

<john.glynn@steelecountymn.gov>; Krueger, Greg <Greg.Krueger@steelecountymn.gov>; Prokopec, Joshua <joshua.prokopec@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

Dear Rob and Campbell,

I was able to inspect the County's public data on **December 9, 2025**, arriving at approximately **4:00 p.m.** I had several specific tasks I intended to accomplish during this inspection:

- Inspect traffic studies that were previously inaccessible
- Inspect the most recent dataset made available
- Inspect the dataset that Matt Sennott was previously unable to review
- Locate several specific emails from the original datasets

I was **unable to accomplish any of these tasks**.

I am therefore providing formal notice regarding the County's **continued failure to provide meaningful access** to public data requested in connection with the East Side Corridor project, as required under **Minn. Stat. §13.03**.

Despite repeated attempts to inspect the data on **July 21, August 28, October 28, and December 9,** and repeated notice to the County, the data and inspection environment provided have not allowed meaningful access or review.

Ongoing and Uncorrected Access Failures (Timeline)

Meaningful access to the requested public data has **not been available since March 11, 2025**. Any access attempts after that date have been thoroughly documented as inaccessible, unstable, or unusable.

These failures did not occur in isolation. The current conditions compound previously documented data access issues identified on **January 15 and February 4, 2025**, which were formally raised with the County and **never corrected**.

Despite repeated notice over multiple months, the County has not restored stable, complete, and reasonably usable access to the public data. Instead, access has progressively degraded over time, culminating in the inspection failures documented below.

Dataset 1 and Dataset 2 – Email Records (Materially Incomplete)

The jump drive labeled **Dataset #1**, which previously contained **over 1,800 email records**, contained only **18 accessible emails** at the time of inspection. As a result, I was unable to locate specific emails that I had previously reviewed and relied upon. This raises concerns regarding the integrity and completeness of **Dataset #2** as well.

During earlier inspections, I spent **many hours loading thousands of emails into Outlook** to make the data in these datasets reasonably usable. Outlook is no longer available on the inspection system, and the email data previously accessed is no longer present or accessible in that form.

Additionally, the email files are **randomly named and not organized chronologically or logically**, making it impossible to locate known records. Outlook was necessary to render the data usable. Because of these defects, I was unable to locate specific records that are vital to preparing my Environmental Assessment Worksheet (EAW) comments.

Loss of Data Integrity and Irreparable Prejudice

Even if the County were able to recover or re-produce the missing email data at some point, the repeated access failures have created a **loss of continuity and verifiability**. There is no way to confirm that any subsequently provided data would be identical to the datasets previously available or that it would include all records originally responsive to the request.

In addition, restoring access at this stage would require re-reviewing and re-organizing a substantial volume of data that was originally requested more than **14 months ago**. Residents previously spent **approximately 15–18 hours** reviewing and organizing these records in order to make them usable.

Requiring this work to be repeated due to the County's access failures imposes an **unreasonable burden** and further prejudices meaningful participation. Delayed or reconstructed access does not cure the denial of access that has already occurred.

Dataset 4 – Degraded and Unusable Email Content

The most recent dataset appears to consist of emails converted to **.txt files**. These files are severely degraded, including instances where text appears **one character per line**. Attachments, metadata, threading, original formatting, and contextual structure have been removed.

As presented, these files are **functionally unusable** and do not allow meaningful inspection. Public data must be provided in the manner in which it is generally stored and maintained. Email records are not stored as .txt files, and conversion to this format strips essential context, attachments, and usability.

PST / Native Email Files

PST and native email files are present in dataset #3, including a PST associated with **Paul Sponholz** exceeding **3 GB**, which Matt Sennott documented as usable on **July 21, 2025**. When opened during this inspection, the file displayed a blank screen with no email content. Other PST or native files similarly failed to open or display records in a meaningful way.

Third-Party Viewing Software

The County replaced standard email software with third-party viewers, including **CoolUtils Outlook Viewer and other third party viewers**. As configured, this software does not present email records in a commonly

understood or intuitive format. Navigation is not common-sense, layout is non-standard, and email content appears fragmented and distorted.

The software does not allow for loading and retaining multiple email files; previously viewed content disappears upon closing, making review tedious and impracticable. Emails cannot be reviewed as a complete dataset or viewed chronologically.

Files are assigned **random filenames** with no logical order, date, sender, or subject identifiers. This prevents sorting, searching, timeline reconstruction, identification of related correspondence, or location of known records.

The use of this software, as well as other viewers such as the Word document viewer, alters how records appear — including fonts, spacing, and layout — and does not display records as they are ordinarily maintained or reviewed. In practice, the records appear **garbled rather than intelligible public data**.

Physical Media and System Failures

The County provided **four USB drives and one CD** for inspection. I was unable to access any data on the USB drives. The PDF files on the CD could be opened, but access was extremely slow. Word documents that were previously available are now missing.

I was informed that certain Word documents were converted to PDFs and that both formats were available; however, I did not observe corresponding Word and PDF versions of these files.

The County previously testified under oath that it purchased a **new computer system dedicated to public data inspection**. The system provided is outdated and unstable. Upon startup, it entered an **automatic repair process**, demonstrating that it is not suitable for public data inspection.

Security, Integrity, and Availability of Standard Government Tools

The access failures described above are not justified by security, technical, or licensing constraints.

The County has previously testified under oath that it operates within a **Microsoft enterprise environment with full Microsoft licensing**. As such, the County already possesses secure, compliant tools capable of displaying email and document records **as maintained**, including licensed Microsoft Office applications designed for enterprise and government use.

Standard configurations exist that allow records to be viewed in a **read-only, offline environment**, preserving data security and integrity while allowing meaningful inspection. These configurations do not require user accounts, internet connectivity, or modification of underlying data.

Instead, the inspection environment relied on **non-standard third-party viewing applications** that fragment datasets, alter formatting and layout, and prevent coherent review. Beyond impairing access, this approach introduces **system governance and security risk**. Inspection systems can be reconnected to a network with minimal action, and third-party software that does not operate within a managed enterprise update and security framework increases exposure to vulnerabilities and outdated components.

This approach introduces security risk and departs from standard government IT practices designed to minimize risk and preserve data integrity.

The inspection environment provided is therefore **neither secure nor functional** for purposes of public data inspection.

Avoiding licensed, enterprise-managed software in favor of non-standard viewers is not a reasonable tradeoff where it introduces additional security and governance risk.

Impact on Legal Participation

As a result of these **ongoing, uncorrected access failures**, the data is incomplete, inaccessible, and degraded to the point of being unusable. These conditions have directly interfered with my ability, and my community's ability, to review public records necessary for **meaningful participation in the ongoing Environmental Assessment Worksheet (EAW) process**.

At this point, the condition of the data and the inspection environment constitutes **denial of access to public data** under Minn. Stat. §13.03.

For clarity, I hold a **degree in computer science** and am experienced in reviewing large electronic datasets. Despite that expertise, I was unable to access or meaningfully review the data as provided.

I documented these conditions with photographs and video at the time of inspection.

ction.

Governance and Compliance Notice

The Office of Administrative Hearings has made clear that **meaningful access to public data is a prerequisite to lawful public participation**, and that public entities have an affirmative obligation to ensure that such access is provided. In this case, the continued denial of usable access — including missing datasets, degraded records, and data previously available and now inaccessible — is occurring during the **active EAW comment period**, when public review is required to be informed and substantive.

Under **MEPA and NEPA**, public participation is intended to occur **early and often**, with access to the underlying data necessary to evaluate purpose, need, impacts, and alternatives. Here, ESC-related public data essential to that review was not made meaningfully accessible **prior to the release of the EAW**, and remains inaccessible now.

Proceeding with the EAW while required data remains unavailable undermines the **procedural integrity** of the environmental review and deprives the public of the opportunity for **meaningful participation** contemplated by state and federal law.

In light of these unresolved access failures and the requirements of MEPA and NEPA for informed public participation, proceeding with the EAW while essential public data remains unavailable raises serious procedural concerns. The appropriate corrective action under these circumstances is to **pause the EAW process until meaningful access to the required data has been restored**, so that public participation can occur as required by law.

Because these matters involve required compliance with an OAH order (CAH 22-0305-40882), East Side Corridor–related public data, and the integrity of EAW procedures, I have copied the County Board for awareness and oversight.

Requested Action

Please advise, in writing, how and when the County will provide access to the **complete, intact, and reasonably usable dataset** in a stable and functional inspection environment, as required by Minn. Stat. §13.03.

Sincerely,
Melissa Zimmerman
Owatonna East Side Corridor Residents

On Tue, Dec 9, 2025 at 12:47 PM Lyssa Lynn <lyssalynn13@gmail.com> wrote:

> I will do my best to make it there around 3. After you said the office wasn't open, I reached out to the city to schedule inspection and will be there until 3.

On Tue, Dec 9, 2025 at 6:05 AM Housh, Campbell <Campbell.Housh@steelecountymn.gov> wrote:

> Hello,
>
> We have an all staff event that will occupy a lot of our space for much of the afternoon, but we can make the small conference room available for data viewing at 3:00 p.m.
>
> Sincerely,
>
> Campbell Housh
>
> Chief Deputy County Attorney
>
> Steele County Attorney's Office
>
> 303 S. Cedar Avenue

Owatonna, MN 55060

Office Line: 507-444-7778

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---

From: Lyssa Lynn <lyssalynn13@gmail.com>
Sent: Monday, December 8, 2025 8:26 PM
To: Housh, Campbell <Campbell.Housh@steelecountymn.gov>; Matthew Sennott <matt.sennott@gmail.com>; Jarrett, Robert <Robert.Jarrett@steelecountymn.gov>; Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

You don't often get email from lyssalynn13@gmail.com. Learn why this is important

I was planning to inspect data in the afternoon as I have appointments in the morning. Is the County Attorney's office closed tomorrow afternoon? If so, I am not available again until Monday the 15th.

Thanks,
Melissa

On Mon, Dec 8, 2025 at 6:42 PM Housh, Campbell <Campbell.Housh@steelecountymn.gov> wrote:

> Hi there,
>
> I thought I would respond and introduce myself to give a bit of an update on your question below.
>
> I would be happy to meet. As far as scope, I see the general purpose being to provide a point of contact between our office and yourself / Mr. Sennott to talk about any issues you want to bring

up. There is absolutely no obligation of any kind or rush to meet – just an open offer. As far as scheduling, if there is interest I would be happy to find a time where we could all meet.

I know you had mentioned wanting “to ensure any discussion is productive and aligned with the remaining issues, including data accessibility and the expected timeline for completion of our outstanding requests.” Given that the email exchanges that have taken place between then are directly addressing those issues, I was waiting to chime in regarding the scope of the meeting. I certainly would be open to meeting before the holidays, but given the estimated completion date and ongoing exchanges maybe it would be more fruitful to find a time after the holidays.

Also, I wanted to make sure to let you know that if you decide to come in to view data tomorrow, the office would be open for that purpose between 8:15 a.m. and 12:00 p.m,- in case it makes planning your day out more convenient. I hope everyone has a restful evening!

Best,

Campbell Housh

Chief Deputy County Attorney

Steele County Attorney’s Office

303 S. Cedar Avenue

Owatonna, MN 55060

Office Line: 507-444-7778

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From: Lyssa Lynn <lyssalynn13@gmail.com>
Sent: Monday, December 8, 2025 5:22 PM
To: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Cc: Jarrett, Robert <Robert.Jarrett@steelecountymn.gov>; Matthew Sennott <matt.sennott@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>; Housh, Campbell

<Campbell.Housh@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

You don't often get email from lyssalynn13@gmail.com. Learn why this is important

Hello Mr. Jarrett,

I should be available tomorrow to come in and inspect data.

In an earlier email, you mentioned the possibility of a meeting with another attorney, but did not indicate the purpose or any proposed time. Could you please provide an update on whether that meeting is still being considered, and if so, what the intended purpose would be so I can plan and coordinate accordingly?

Thank you,

Melissa Zimmerman

On Mon, Dec 8, 2025 at 4:49 PM Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com> wrote:

> County Attorney Jarrett,
>
> Thank you for your response. We need clarification on several points where the County's "no data exists" determinations conflict with data that clearly does exist and with the requirements of Minn. Stat. §§ 13.03, 13.05, and 15.17.
>
> ---
>
> **1. Joint Transportation Committee (JTC)**
>
> Steele County's own 2025 Committee Appointments document lists the **Intergovernmental Joint Transportation Committee** under "Joint Powers, Advisory Board, Regional Representation." This is responsive data showing the Committee's official status.
>
> Additionally, **commissioner per diem/attendance records for JTC meetings exist** and were not produced. These records alone demonstrate that the County *has* maintained JTC-related data.
>
> For clarity:
> Our JTC request was **not limited to minutes**. It includes all data the County "created, received, maintained, or disseminated" regarding the JTC, including emails, correspondence, materials provided to commissioners, formation/purpose records, and any ESC-related documents.

Given that responsive records **do** exist, please explain:

1. Why they were not identified or produced;
2. Whether the County intends to correct its “no data” response; and
3. If you maintain that another entity holds additional JTC records, **which entity** and whether Steele County has requested copies pursuant to §13.05, subd. 11.

---

2. Noise Studies / Noise Modeling

Your response states that no noise studies were “conducted or received.”
However:

- **WSB transmitted ESC noise modeling to the State**, and
- **County commissioners received portions of this modeling within the last few weeks.**

This contradicts the County’s assertion that no such data exists or was received. Under Minn. Stat. §13.05, consultant-produced modeling is government data, and the County is required to request and provide it.

Please clarify:

1. Whether the County now acknowledges the existence of ESC noise modeling;
2. Whether the County has requested the full modeling data from WSB; and
3. Why this data was not identified or produced in response to our request.

---

3. Required Documentation for “No Data” Determinations

For each item where the County continues to assert that no responsive data exists, please provide:

- The systems, databases, and locations searched;
- Date ranges;
- Staff who performed each search;
- Whether archived, OneDrive, email, or consultant-held data was included; and
- Any documentation reflecting search steps (search terms, internal notes, communications).

If no documentation exists for any of these searches, please confirm that in writing.

We appreciate the ongoing work involved in processing these requests. At this point we are simply seeking to reconcile the County’s statements with the existence of responsive data and with statutory requirements.

We look forward to your clarification so that these requests can be considered fully responded to.

Respectfully,
Melissa Zimmerman & Matt Sennott
Owatonna East Side Corridor Residents

On Mon, Dec 8, 2025 at 4:07 PM Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> wrote:

Dear Ms. Zimmerman and Mr. Sennott,

Thank you for your continued engagement regarding the East Side Corridor (ESC) data practices requests.

Re: Joint Transportation Committee

You are misinterpreting Minn. Stat. § 471.59. This statute does not require the county to enter into a joint exercise of powers; it allows the county to enter into agreements but does not require it to do so. Additionally, to my understanding, this committee exercises no authority or government powers. This committee has no formal agreement. It is no different than any other ad hoc committee. Therefore, the committee is not required and does not have minutes. While the Joint Transportation Committee is listed as a Joint Powers entity, Steele County is not the responsible authority for maintaining its records. We have confirmed that no records were created or received by the County in connection with this Committee. If records exist, they may be maintained by another participating entity. The County has not destroyed any such records, nor were any withheld.

Re: Noise Studies

Former county engineer Paul Sponholtz told us there were no formal noise studies. Regarding Ms. Fry's Testimony: Ms. Fry's statement during the ALJ proceeding accurately reflects the scope of the County's search. To the county's knowledge, Mr. Sponholz conducted a targeted search of the relevant drive where ESC-related project files are maintained. The county's position remains that no noise studies were conducted or received.

Re :Commissioner Emails

Microsoft Purview now has an analytics tool that produced the attached summary for the "Commissioner ESC" data request. It includes a search of OneDrive as well as emails. As you can see, there are 5829 items, an unknown number of page(s) for each. I provided the columns FileClass, SubjectTitle, and Location. If you'd like to speed up the document request, I can certainly go through a specific item if you highlight them from this list. Otherwise, it is thousands of pages that likely contain irrelevant information but do fit your

data request. **There are 336 items ready for review.** The estimated competition date is updated to January 2, 2026.

This and previously requested and responsive data remain available for viewing in accordance with Minn. Stat. § 13.03.

Robert J. Jarrett

Data Practices Responsible Authority Steele County

Steele County Attorney

Direct: 507-444-7786

From: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Sent: Friday, December 5, 2025 10:16 PM
To: Jarrett, Robert <Robert.Jarrett@steelecountymn.gov>; Matthew Sennott <matt.sennott@gmail.com>; Lyssa Lynn <lyssalynn13@gmail.com>
Cc: Fry, Renae <renae.fry@steelecountymn.gov>; Housh, Campbell <campbell.housh@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

County Attorney Jarrett,

Thank you for providing the updated status of the ESC-related data practices requests.

For several of the requests, including but not limited to **Noise Studies** and the **Joint Transportation Committee**, the County's response indicates that no responsive data exists. Under Minn. Stat. §13.03 and longstanding guidance from the Department of Administration, when a government entity determines that requested data does not exist, the response must include a description of the steps taken to determine that the data is not maintained by the entity.

Your response did not include this required information.

To consider these portions of our requests complete, please provide the following for each item marked "Completed – no data":

1. The systems, databases, email accounts, physical files, and repositories that were searched
2. The date ranges included in the search
3. The staff (by name or position) who conducted the search

4. Whether archived, backup, off-site, or consultant-held data was examined
5. Whether relevant third parties — including WSB — were asked to provide responsive data
6. Any documentation confirming that the requested data does not exist

For each item in which the County determined that no responsive data exists, please also provide any documentation reflecting how the search was conducted, including search terms used, locations queried, communications with staff or consultants, and any internal notes, emails, or records demonstrating the steps taken. If no such documentation exists, please confirm that in writing.

We also request clarification on how the County's current responses align with testimony provided during the recent MGDPA proceeding. Ms. Fry testified that only Mr. Sponholz searched a single drive for noise studies, and that the County does not maintain records for the Joint Transportation Committee.

Under Minn. Stat. §13.05 and multiple advisory opinions, government entities are responsible for public data created, received, or maintained by contractors performing governmental functions. If WSB or any other consultant performed noise analysis or modeling for the East Side Corridor, the County is obligated to request that data from the consultant and provide it as part of this request. Please confirm whether such data exists with WSB and whether the County has requested it.

The attached 2025 Steele County Committee Appointments document lists the "Intergovernmental Joint Transportation Committee" under "Joint Powers, Advisory Board, Regional Representation." Because the Joint Transportation Committee is identified as a Joint Powers entity under Minn. Stat. §471.59, it is required to maintain official records under Minn. Stat. §15.17, and such data is public under Minn. Stat. §13.03.

In light of this, please clarify whether responsive records for the Joint Transportation Committee:

- were not created,
- were created but have since been destroyed, or
- exist but were not requested or produced during the search.

Thank you for your attention to these matters. We look forward to receiving the required clarification and documentation so that these requests may be considered fully responded to in accordance with Minnesota law.

Respectfully,
Melissa Zimmerman & Matt Sennott
Owatonna East Side Corridor Residents

On Thu, Dec 4, 2025, 1:43 PM Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> wrote:

> Good afternoon,

Below is a summary of the ESC data practices requests and the current status.

If you are aware of any other requests, please let me know.

My responses may be delayed due to my schedule. Of note, I am at the MCAA conference this week, jury trial week of December 15, out of office week of January 19, and out of office week of February 23.

The county's budget includes an additional attorney whose responsibilities will include data practices; however, that position does not begin until the last quarter of 2026.

Topic	**Sub request**	**Status**
All ESC Data	Large request – remains in progress overall, broken into smaller parts, and provided in waves.	*In progress* Estimated completion Feb 22, 2
	Emails – Paul & Greg to WSB	Completed & available
	Emails - county commissioners	*In progress* Estimated date: December 12, 2025
	Emails - Township & Annexation	Estimated date: January 9, 2026
	Emails - Federal Funds Transfer	Estimated date: February 6, 2026
	Physical documents ~20 boxes per Paul Sponholtz	On hold per requestors until em
Policy Data		*Completed*

Joint Transportation		*Completed* No minutes or information relat transportation committee".
Noise Studies for ESC		*Completed* The county does not have any
Engineer Service Proposals		*Completed*
Bonds of Officials		*Completed*
Traffic Counts		*Completed* No data
Roadway Safety Plan		*Completed*
Owatonna HS Traffic Impact Study		*Completed*

Robert J. Jarrett

Steele County Attorney

303 S. Cedar Avenue

Owatonna, MN 55060

Tel: 507-444-7780

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Comment #63B

MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS

Court of Administrative Hearings
PO Box 64620
Saint Paul, MN 55164-0620
651-361-7900
mn.gov/cah/

November 24, 2025

VIA EMAIL ONLY
Matt Sennott
2519 Stony Creek Dr
Owatonna, MN 55060
owatonnaeastsidecorridor@gmail.com

VIA EMAIL ONLY
Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN 55060
owatonnaeastsidecorridor@gmail.com

VIA EMAIL ONLY
Mary Haasl
Margaret A. Skelton
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444 Cedar St Suite 2100
Saint Paul, MN 55101
mmh@ratwiklaw.com;
mas@ratwiklaw.com

VIA EMAIL ONLY
Robert J. Jarrett
Steele County Attorney's Office
303 S Cedar Ave
Owatonna, MN 55060
scao@steelecountymn.gov

Re: ***In the Matter of Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman vs Steele County***
CAH 22-0305-40882

Dear Parties:

Enclosed and served upon you please find the **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER** in the above-entitled matter. The Court of Administrative Hearings' file in this matter is now closed.

If you have any questions, please contact me at (651) 361-7970, cara.hunter@state.mn.us, or via facsimile at (651) 539-0310.

Sincerely,

CARA HUNTER
Legal Assistant

Enclosure

cc: Docket Coordinator
Tamar Gronvall

CAH 22-0305-40882

STATE OF MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS

In the Matter of Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman vs. Steele County	**FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER**

This matter came before Administrative Law Judge Christa L. Moseng for a hearing on October 10, and 17, 2025. The first day of the hearing took place remotely and exclusively involved procedural matters. The second day of the hearing took place at the Steele County Administration Building, 630 Florence Avenue, Owatonna, Minnesota. Both parties filed written closing arguments on November 7, 2025, at which time the hearing record closed.

Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman (Complainants) appeared on their own behalf and without counsel. Mary Haasl and Margaret Skelton, Ratwik, Roszak & Maloney, P.A., appeared on behalf of Steele County (Respondent or County).

On May 30, 2025, Complainants filed a Data Practices Complaint (Complaint) with the Court of Administrative Hearings alleging that the County violated the Minnesota Government Data Practices Act (MGDPA or Act).[1] On June 3, 2025, the undersigned issued an order requiring Complainants to file an amended version of the large exhibit attachment to the Complaint limited to MGDPA claims, serve a copy on the County, and stayed the County's response deadline until the amended attachment were served on the County.[2]

Complainants filed amended attachments to the Complaint on June 17, 2025.[3] Complainant served the MGDPA Complaint and amended supporting evidence on the County on July 16, 2025.[4] The County filed a request for an extension of their response deadline on July 25, 2025.[5] The Judge granted the County an extension of seven days for its response, and the County timely filed an Answer to the Complaint on August 15, 2025.[6]

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[1] Minn. Stat. §§ 13.01–.99 (2024).
[2] Order Ensuring Expeditious Service of Complaint Under Minn. Stat. § 13.085, subd. 2(d) (Jun. 3, 2025) (a more detailed discussion of the procedural posture is included in the attached Memorandum).
[3] Complaint and amended supporting evidence (June 17, 2025).
[4] Complainant Affidavit of Service (Jul. 18, 2025).
[5] Motion to Extend Deadline to File a Response (Jul. 25, 2025).
[6] Order Granting Extension for Time to File a Response (Aug. 1, 2025); Notice of Motion and Motion to Dismiss (Aug. 15, 2025).

On September 15, 2025, the Judge determined that Complainant's claims against Respondent for violations of Minn. Stat. § 13.03, subd. 2(a) and 3 were supported by probable cause and would proceed to a hearing.[7]

Complainant's exhibits 1-44 were received into evidence. Respondent's exhibit marked 100, with attachments marked 100A-100K, was received into evidence.

STATEMENT OF THE ISSUES

1. Did Respondent violate Minn. Stat. § 13.03, subd. 3, by charging a fee in response to a request to inspect public government data?

2. Did Respondent violate Minn. Stat. 13.03, subd. 2(a) by failing to put in place procedures that ensured prompt and appropriate responses to requests for public data?

3. If so, what remedy is appropriate to address the violation(s)?

SUMMARY OF CONCLUSIONS

Respondent violated Minn. Stat. § 13.03, subd. 3 by informing Complainants, who requested access to government data for purposes of inspection only, that payment of a $0.25 fee for any photographs taken of the data was required. The County admitted it violated the MGDPA and has remedied the violation by eliminating this procedure.

Respondent's procedure of addressing multiple requests for government data from a single requestor exclusively in the order in which those requests were received violated Minn. Stat. § 13.03, subd. 2(a), because it resulted in responses to requests that were not prompt, as required by statute. The County has remedied this by moving to a more flexible procedure that allows smaller data requests to be handled more rapidly.

Respondent's procedure for responding to requests submitted to the Responsible Authority resulted in multiple inappropriate responses to data requests in violation of Minn. Stat. § 13.03, subd. 2(a).

Based on the record and pursuant to Minn. Stat. §§ 13.085, subd. 5(a)(3) and (b), a $300 civil penalty is assessed against the County.

The Complainants have substantially prevailed in this matter. Under Minn. Stat. § 13.085, subd. 6(c), $950 of their original filing fee will be refunded and the County will be billed for the Court's costs in conducting this matter, up to a maximum of $1000.[8]

Based on the evidence in the hearing record, the Judge makes the following:

[7] Notice of Probable Cause Determination and Order for Prehearing Conference (Sep. 19, 2025).
[8] Minn. Stat. § 13.085, subd. 6(c).

FINDINGS OF FACT

I. Background

1. Steele County is located in Southeastern Minnesota and contains both the City of Owatonna and Owatonna Township within its borders.[9] The County is involved in an ongoing infrastructure project known as the East Side Corridor Project (ESC Project or Project).[10]

2. The goal of the ESC Project is to build a new road along the eastern edge of the City of Owatonna, largely within Owatonna Township.[11] The project aims to reroute traffic out of the city center and onto this new road.[12]

3. Residents who live near the proposed location of the new road have organized to advocate and provide input regarding the ESC Project.[13]

4. Complainants made multiple requests to the County for government data in connection with the ESC Project under the MGDPA.[14]

5. Robert Jarrett (County Attorney Jarrett) is the County Attorney in Steele County, the Responsible Authority for the County under the MGDPA, and the County's Data Practices Compliance Officer.[15] Renae Fry (County Administrator Fry) is the Steele County Administrator and is the formal Designee under the MGDPA for the County's Administration department.[16]

6. The County's MGDPA procedures and guidelines were formally updated by the Steele County Board on August 12, 2025.[17] Prior to that, the last update to the MGDPA procedures and guidelines took place on August 1, 2019.[18] The MGDPA procedures and guidelines form an "overarching policy" for data practices in Steele County.[19]

---

[9] *See* Steele County Demographics and Geography, https://www.steelecountymn.gov/visitors/about_steele_county/facts_and_figures.php (last visited Nov. 17, 2025).
[10] *See* Exhibit (Ex.) 9.
[11] Ex. 13 at ESC-67.
[12] Ex. 43 (Showing a local news report discussing the overall purpose of the East Side Corridor Project as well as responses from the public to it.).
[13] *See* Ex. 45; *and* Complaint at 3 (May 30, 2025) (The two named Complainants, Matt Sennott and Melissa Zimmerman "are representing a group of 60 (i.e. East Side Corridor Residents) residents and 500+ petition signers who support our cause of getting access to public data via our data request(s).").
[14] *See, e.g.* Steele County's Post-Hearing Brief at 1 (Nov. 7, 2025) ("Steele County ("County") received eleven data requests and one preservation request under the Minnesota Government Data Practices Act ("MGDPA") from Complainants Matt Sennott, Melissa Zimmerman, and the Owatonna East Side Corridor Residents (hereinafter, "Complainants") from October 2024 through July 2025.").
[15] Ex. 100A at 33; Ex. 37 at ESC-278.
[16] Ex. 100A at 33; Ex. 37 at ESC-278.
[17] Test. Fry; Ex. 38 at ESC-244.
[18] Ex. 100B; Ex. 37 at ESC-196.
[19] Testimony of Renae Fry (Test. Fry).

7. Under the August 12, 2025 procedures, data requests made to the County are first routed to County Administrator Fry, who determines whether they can be answered solely with public-facing or other easily accessible data, or if further work with specific departments or staff will be necessary.[20] If a request involves only easily accessible or public facing documents, County Administrator Fry can often complete the request entirely on her own.[21]

8. More complicated requests, on the other hand, require coordinating with other departments, in particular the information technology (IT) Department.[22] The County Attorney's office is also involved in reviewing data requests to ensure coordinated, uniform responses and to review for private or otherwise non-public data.[23]

9. Currently, the IT Department employs four people, though one is assigned full-time to supporting the MNPrairie Human Services organization.[24] The County IT Department is involved in data requests because the County uses Microsoft Onedrive for backups of its government data.[25]

10. Onedrive is a "cloud-based storage tool" used to create a backup of "anything that is generated electronically within the county."[26] Every County employee has an account on Onedrive. This results in a massive database, but access to that data is limited such that each employee can access only the data needed for their work.[27] In order to search for government data across multiple, or all, individual accounts, assistance from the IT Department is required.[28]

11. The IT Department is able to perform keyword searches in order to create a pool of possibly-responsive data for a given data request.[29] This data must then be reviewed by County Administrator Fry or the County Attorney's office in order to ascertain (1) whether it is, in fact, responsive to the request in question and (2) whether it contains any data that cannot be provided under law.[30]

12. The County's policy was to require a fee of $.25 for every copy of a document a requester made, including creating the copy with their own camera.[31][32]

---

[20] Test. Fry.
[21] Test. Fry.
[22] Test. Fry.
[23] Test. Fry.
[24] Test. Fry.
[25] Test. Fry.
[26] Test. Fry.
[27] Test. Fry.
[28] Test. Fry.
[29] Test. Fry.
[30] Test. Fry.
[31] The County admitted that telling requestors it would charge a fee for taking photographs of government data violated Minn. Stat. § 13.03, subd. 3.
[32] *Also see* Steele County's Post-Hearing Brief at 3 (discussing the fact that the County had already conceded the violation on this issue).

II. Requests for Data and Responses at Issue

A. ESC Communications Request

13. On October 25, 2024, Complainants requested from the County the following data:

> Any and all email correspondence since 2019 related in any way to the East Side Corridor (ESC) Project, 29th Ave, East Beltline study, and infrastructure on the E. Side of Owatonna, going to, from and between:
>
> - County commissioners
> - County staff
> - City council members
> - City staff
> - 3rd parties (including but not limited to WSB)
> - To and from any of the above and members of the public
>
> In addition, please provide any and all documents, studies, and information related to the East Side Corridor (ESC) project, 29th Ave, East Beltline study, and infrastructure on the E. Side of Owatonna *not currently (as of today) on the public-facing county website:* https://eastsidecorridor-wsbeng.hub.arcgis.com/
>
> This would include but is not limited to information used in determining the purpose and need for the East Side Corridor, 29th Ave East beltline study and infrastructure on the E. Side of Owatonna. Also, any information and documentation related to commercial developments in the area of the proposed East Side Corridor "preferred route" and "study area". This also includes any and all email correspondents[sic] between City and county officials, staff and third parties.[33]

14. Initial responses to this request from the County estimated that it "will likely need several weeks to assemble everything."[34] As a result, the parties organized that the October 25, 2024, data request would have rolling partial responses from the County, based on priorities set by the Complainants.[35]

15. The IT Department's initial searches for relevant data generated over 7600 items that required further review.[36] As of the October 2025 hearing dates, just over a year after the October 25, 2024 data request, rolling partial releases of responsive data

[33] Ex. 1 at ESC-1 - ESC-2.
[34] Ex. 27 at ESC-167.
[35] *See* Exs. 26-27.
[36] Ex. 26 at ESC-158.

by the County continue.[37] To date three releases of data have been completed by the Respondent.[38]

16. There has been conflict and confusion between the parties over multiple aspects of these reviews. These issues have included technical issues with the computers and software used to review the data and conflict over scheduling, availability, and locations for the reviews.[39]

17. These issues have stemmed from factors outside of either parties' control – such as technical issues with software or computers – or from confusion or miscommunication regarding dates, times, and places.[40]

B. Engineering Service Proposals Data Request

18. On January 13, 2025, Complainants requested:

> copies of the professional engineering service proposals for the East Side Corridor. These proposals should have been included in the commissioners' board meetings packet which is available online for the 12/14/2021 meeting, as is standard for all other projects. However, they appear to be missing.[41]

19. On January 16, 2025, County Attorney Jarrett informed Complainants that their request was ready to be picked up at the County Attorney's Office or via electronic delivery, and that the cost of the copies would be $12.50 for 50 pages total.[42]

20. Complainants paid the County $12.50 on January 22, 2025.[43]

C. Joint Transportation Committee Request

21. On January 31, 2025, Complainant Melissa Zimmerman emailed County Administrator Fry stating that she was "looking for the meeting minutes from the Joint Transportation Committee meeting referenced in the board meeting minutes."[44] After determining that County Administrator Fry was out of the office until February 10, 2025, and contacting another County staff member, her email was forwarded to County Attorney Jarrett.[45]

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[37] Test. Fry.
[38] Test. Fry.
[39] Testimony of Melissa Zimmerman (Test. Zimmerman); Testimony of Matthew Sennott (Test. Sennott); Test. Fry; *See generally* Exs. 26-28 (showing a large number of emails between the parties attempting to negotiate and coordinate the timelines and data inspections involved in this request).
[40] Test. Zimmerman; Test. Sennott; Test. Fry.
[41] Ex. 2 at ESC-7.
[42] Ex. 2 at ESC-8 – ESC-9.
[43] Ex. 100H.
[44] Ex. 3 at ESC-14; Ex. 100C.
[45] Ex. 3 at ESC-12-13; Ex. 100C.

22. On February 4, 2025, County Attorney Jarrett replied stating in relevant part that 1) "[f]rom this point forward, please direct any requests for documents/questions regarding the East Side Corridor to only myself and [County Administrator]. Fry. We will track the requests, provide data in the order it was requested, and in compliance with the Chapter 13 Government Data Practices Act" and 2) "Related to your request below for 'Joint Transportation Committee' minutes, Steele County does not maintain those minutes, so therefore does not have the minutes to provide you."[46]

23. On March 31, 2025, Complainant Zimmerman sent the County a second data request relating to the "Joint Transportation Committee."[47] The form stated:

> I am requesting any and all information regarding the Joint Transportation Committee including but not limited to:
> When was it created?
> Why was it created?
> Who created it?
> What is its purpose?
> What are the by-laws or operating procedures?
> How many members?
> Member names and terms?
> When does it meet?
> Attendance Information?
> What projects and initiatives has it worked on?
> Financial information and budget impacts?
> Committee's charter or purpose and any amendments?
> Minutes, Agendas, Files, Accounts, and any other documents that a governmental body is required to maintain?
>
> And any other information that may pertains[sic] to the Joint Transportation Committee.[48]

24. On April 1, 2025, County Attorney Jarrett replied by email, stating: "This is not a data request. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format in order to answer questions. This request will be closed."[49]

25. On April 2, 2025, Complainant Zimmerman sent the County another data request form that was identical to the March 31, 2025, request, except all question marks had been deleted.[50]

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[46] Ex. 3 at ESC-12; Ex. 100C.
[47] Ex. 3; Ex. 100D.
[48] Ex. 3; Ex. 100D.
[49] Ex. 100E
[50] *Compare* Ex. 5 at ESC-17 – ESC-18 *with* Ex. 3 at ESC-10 – ESC-11.

26. On April 8, 2025, County Administrator Fry observed Complainant Zimmerman in conversation with County Commissioner Krueger.[51] County Administrator Fry heard Commissioner Krueger explain to Complainant Zimmerman that the Joint Transportation Committee was "not a body of Steele County, it is not a committee where there is a quorum present of either Steele County Board members or City of Owatonna City Council members."[52]

27. On April 10, 2025, and April 14, 2025, Complainant Zimmerman followed up with County Attorney Jarrett by email, requesting confirmation of receipt or updates regarding the April 2, 2025 data request.[53]

28. On April 18, 2025, Complainant Zimmerman sent a third copy of the data request to both the County and the Administrator of the City of Owatonna. It was identical to the April 2, 2024, request, and the form explicitly noted that it was a resubmission of the prior request.[54]

29. County Attorney Jarrett did not reply to any of Complainant Zimmerman's follow up emails because he did not believe they were proper data requests, but rather sought answers to questions. Moreover, Jarrett "had already informed Complainant Zimmerman that the County did not maintain data on the Joint Transportation Committee."[55]

D. Noise Studies Data Request

30. On April 2, 2025, Complainant Zimmerman sent another request for data to the County, stating:

> I am requesting copies for inspection of all noise studies conducted for the East Side Corridor (ESC) project that were initiated on or after January 1, 2020. This includes, but is not limited to, initial assessments, updated analyses, modeling data, and any related reports or documentation. Please provide both draft and final versions, along with any supporting materials used in these studies.[56]

31. Complainant Zimmerman followed up on the request with County Attorney Jarrett by email on April 10, and April 14, 2025.[57]

[51] Test. Fry.
[52] Test. Fry.
[53] Ex. 5 at ESC-19 – ESC-20.
[54] Ex. 100D; Test. Fry (identifying the City of Owatonna official who received the data request).
[55] Ex. 100 at 5.
[56] Ex. 100F; Ex. 6 at ESC-22.
[57] Ex. 100G; Ex. 6 at ESC-23 – ESC-24.

32. The County looked for responsive data by having Paul Sponholtz, a county engineer who was familiar with the East Side Corridor Project, search through emails and records.[58]

33. On April 18, 2025, County Attorney Jarrett replied that "[t]he county does not have any studies or documents related to a noise study for the east side corridor at this time. Since no such data exists at this time, this data request will be closed."[59]

34. Complainant Zimmerman responded by email noting that public statements about relevant noise studies had been made by the County in the past and requesting further review for relevant data.[60] The County provided no response to the follow up email.[61]

E. Transfer of Federal Funds Request

35. On April 9, 2025, Complainants sent a data request to the County requesting to inspect:

> Any and all information relating to the transfer of federal funds from the ESC to the Main St Project. This includes all documentation, emails, written correspondence, text messages, government records, audio or video recordings, and any other data related to the transfer of these funds. Person of correspondence may include but are not limited to ATP members, Paul Sponholtz, Sean Murphy, and County Commissioner, City council, County Administrator, and City Administrator.[62]

36. On April 10, 2025, at 7:41 a.m., County Attorney Jarrett replied via email saying "Received. We begin this following the general ESC requests which is still pending. I suspect it will be several months, likely this fall, before it is ready."[63]

37. At 8:24 a.m. on that same day, County Attorney Jarrett mistakenly sent a second email to Zimmerman. The email was regarding a different data request, and so indicated to Zimmerman that Jarrett had changed his mind on the request for data on the transfer of federal funds. The message stated:

> Ms. Zimmerman, This is not a data request as it is vague and calls for answers to questions. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create

[58] Test. Fry.
[59] Ex. 100G; Ex. 6 at ESC-23.
[60] Ex. 6 at ESC-23.
[61] Ex. 100 at 6.
[62] Ex. 7 at ESC-25; Ex. 100I.
[63] Ex. 7 at ESC-31; Ex. 100J.

data, or to reorganized data into a particular format in order to answer questions.[64]

County Administrator Fry was included as a recipient on this email.[65]

38. Ms. Zimmerman replied to the second email at 8:53 a.m., stating "No, this is absolutely not vague, and there is no ambiguity whatsoever in this request. Just moments ago, you confirmed it was accepted – what changed? This data request is detailed, precise, and explicitly cites the applicable law. You are required to cite the exact provision of Minnesota Chapter 13 that you claim this request fails to meet."[66] Neither this email nor a second follow up about this data request sent on April 14, 2025, received a reply.[67]

39. County Attorney Jarrett did not realize the mistake had been made until a meeting with the County's representation in this case shortly before the hearing.[68]

40. The County has not provided the data requested to the Complainants.[69]

F. County Codes and Policies Data Request

41. On May 6, 2025, Complainants sent the County a data request form requesting inspection of:

1. Any current Code of Conduct applicable to county officials, employees, or board/commission members.

2. Any adopted Code of Ethics governing the actions and responsibilities of county personnel or officials.

3. Steele County's Conflict of Interest Policy for elected officials, employees, and appointed representatives.[70]

It also stated that "If these documents are already available online, a link to them would be appreciated. Otherwise please provide electronic copies."[71]

42. On May 8, 2025, County Attorney Jarrett replied by email stating "[r]eceived. This will be added to the current list of requests made by your group. Estimated this fall/winter."[72]

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[64] Ex. 7 at ESC-33.
[65] Ex. 7 at ESC-33.
[66] Ex. 7 at ESC-32.
[67] Ex. 7 at ESC-32;
[68] Test. Fry.
[69] Test. Fry.
[70] Ex. 11 at ESC-50.
[71] Ex. 11 at ESC-50.
[72] Ex. 11 at ESC-55.

43. On September 30, 2025, County Attorney Jarrett replied again by email, with several attachments. Jarrett stated that the attachments to his email were the County's full reply to the request, and that it would now be closed.[73] No charge was assessed for the digital copies.[74]

G. Communications with Township Data Request

44. Complainants sent another data request to the County on May 6, 2025.[75] This request was for:

> Any and all correspondence, meeting notes, emails, letters, or other communications between Steele County and any township or township officials regarding the East Side Corridor (ESC) project or related annexation matters. This includes, but is not limited to:
>
> - Objections or concerns raised by township representatives
> - Records of township approvals, statements of support, or formal positions
> - Internal or external memos discussing township responses
> - Any documentation regarding the orderly annexation agreement, including discussions related to specific parcels
> - Documentation and notes from any meetings occurring with the township
>
> The timeframe for this request is from January 1, 2021, to the present. Please advise if these records are available electronically or if any estimated costs would apply for physical copies. I am willing to clarify or narrow the scope as needed to facilitate a prompt response.[76]

45. On May 8, 2025, County Attorney Jarrett emailed: "Received. This will be added to the current list of requests made by your group. Estimated this fall/winter."[77]

46. The County has not provided the data requested to Complainants.[78]

H. Truck Traffic Data Request

47. On May 29, 2025, Complainants sent a data request to the County requesting:

> 1. Any and all traffic studies, reports, or raw traffic count data for Shady Avenue and Crestview Lane NE, with a particular focus on truck

[73] Ex. 11 at ESC-56 – ESC-57; Ex. 100K.
[74] *Id*.
[75] Ex. 12.
[76] Ex. 12 at ESC-58 – ESC-59.
[77] Ex. 12 at ESC-63;
[78] Test. Fry.

traffic volumes (e.g. counts, classifications, or percentages of heavy vehicles) currently using these roads. Please include the most recent data available, as well as historical data if relevant for comparison.

2. Any projections, Impact analyses, or modeling related to the East Side Corridor (ESC) that estimate or forecast how truck traffic on Shady Ave and Crestview Ln NE would be reduced or diverted if the ESC is built. This includes traffic modelling results, assumptions used, summary tables, and visualizations or GIS data if available.

3. If no such analysis exists regarding projected truck traffic reduction due to the ESC on these roads, please provide documentation showing that the roads were considered (or not considered) in the ESC traffic impact modeling.[79]

48. County Attorney Jarrett confirmed receipt via email on the same day, stating "We received the data request. We have several ESC requests pending, so this will be added to the pending requests. If the data exists, it will not be completed until this fall due to current volume of requests."[80]

49. On June 10, 2025, County Attorney Jarrett sent Complainants a full response to the May 29, 2025, data request, which said:

> We do not have any documentation related to this data request. As such, the request will be closed.
>
> A response from Paul:
>
> All we have is staff recollection of numerous phone calls of complaints over the years, and comments received from the public during the East Side Corridor public meetings. Also, I reviewed the state traffic counts, they don't show anything on their website traffic mapping application.
>
> Paul Sponholtz, P.E. | County Engineer.[81]

50. Any Conclusion of Law more properly designated as a Finding of Fact is incorporated herein.

51. Any portion of the accompanying Memorandum that is more properly considered a Finding of Fact is incorporated herein.

Based on these Findings of Fact, the Judge makes the following:

[79] Ex. 15 at ESC-76.
[80] Ex. 15 at ESC-82.
[81] Ex. 15 at ESC-81.

CONCLUSIONS OF LAW

1. Minn. Stat. § 13.085 authorizes the Administrative Law Judge to consider this matter and determine whether a violation of the MGDPA[82] occurred.

2. The Court of Administrative Hearings has complied with all procedural requirements under Minn. Stat. § 13.085. Both parties had proper notice of the hearing and an opportunity to be heard.

3. The decision record comprises all evidence and argument submitted until the hearing record closed.[83]

4. Requests for data and associated responses that took place after the Complaint was filed in this matter are beyond the scope of these proceedings.[84]

5. The MGDPA "regulates the collection, creation, storage, maintenance, dissemination, and access to government data in government entities."[85]

6. "Government data" means "all data collected, created, received, maintained or disseminated by any government entity regardless of its physical form, storage media or conditions of use."[86]

7. Respondent is a "government entity" subject to the requirements of the MGDPA.[87]

8. The MGDPA provides that all government data collected, created, or maintained by a government entity shall be public unless classified by statute or federal law as nonpublic or protected nonpublic, or with respect to data on individuals, as private or confidential.[88]

9. A "responsible authority" is a designated individual within a government entity responsible for the collection, use, and dissemination of government data.[89] A "designee" is "any person designated by a responsible authority to be in charge of individual files or systems containing government data and to receive and comply with requests for government data."[90]

10. Government entities and their responsible authority have an obligation to regularly update their written data access policies "no later than August 1 of each year,

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[82] Minn. Stat. §§ 13.01–.991.
[83] Minn. Stat. § 13.085, subd. 4(b).
[84] Minn. Stat. § 13.085, subd. 5(a) (limiting the Judge's final determination following an evidentiary hearing to violations "alleged in the complaint.").
[85] Minn. Stat. § 13.01, subd. 3.
[86] Minn. Stat. § 13.02, subd. 7.
[87] Minn. Stat. §§ 13.01, subd. 1, .02, subd. 7a.
[88] Minn. Stat. § 13.03, subd. 1.
[89] Minn. Stat. § 13.02, subd. 16.
[90] Minn. Stat. § 13.02, subd. 6.

and at any other time as necessary to reflect changes in personnel, procedures, or other circumstances that impact the public's ability to access data."[91]

11. Upon request, a responsible authority or designee shall permit a person to inspect and copy public government data at reasonable times and places. If access to public data is requested for purposes of inspection the responsible authority cannot assess a charge or fee for that inspection.[92]

12. The responsible authority in every government entity "shall establish procedures . . . to insure that requests for government data are received and complied with in an appropriate and prompt manner."[93]

13. In responding to requests for data, "when the procedures are followed and the requested data are not made available appropriately or promptly, the 'established procedures' do not *insure* that government data are properly available."[94] A single inappropriate or not prompt response is sufficient to support a violation of the MGDPA.[95]

14. Complainants bear the burden of proof to establish by a preponderance of the evidence that Respondent violated the MGDPA.[96]

15. The County's procedure of charging an individual who requested access to public data for purposes of inspection a fee should the individual take any photos of the data violated Minn. Stat. § 13.03, subd. 2(a).

16. The County's procedure of addressing requests for government data exclusively in the order in which they were received resulted in responses to the Complainants' requests for public data to not be promptly and appropriately complied with, in violation of Minn. Stat. § 13.03, subd. 2(a).

17. The County provided Complainants with inappropriate responses to requests for government data in violation of Minn. Stat. § 13.03, subd. 2(a) on two occasions.

18. Where the Judge has determined that a violation of the MGDPA occurred, they must take at least one of the following actions:

(1) impose a civil penalty against the respondent of up to $300;

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[91] Minn. Stat. § 13.025, subd. 2.
[92] Minn. Stat. § 13.03, subd. 3(a).
[93] Minn. Stat. § 13.03, subd. 2(a).
[94] *Webster v. Hennepin Cnty.*, 910 N.W.2d 420, 431 (Minn. 2018).
[95] *Webster*, 910 N.W.2d 420.
[96] Minn. R. 1400.7300, subp. 5 (2025). Under Minn. Stat. § 13.085, subd. 5(d), proceedings on a data practices complaint are not a contested case under Minn. Stat. ch. 14; however, the Administrative Law Judge determines that Minn. R. 1400.7300, subp. 5, articulates the correct burden of proof for a data practices case as no other standard is identified in Minn. Stat. § 13.085.

(2) issue an order compelling the respondent to comply with a provision of law that has been violated, and may establish a deadline for production of data, if necessary; and

(3) refer the complaint to the appropriate prosecuting authority for consideration of criminal charges.[97]

19. In determining whether to assess a civil penalty, this tribunal must consider whether the governmental entity has substantially complied with general data practices, including but not limited to, whether the governmental entity has:

(1) designated a responsible authority under Minn. Stat. § 13.02, subd. 16;

(2) designated a data practices compliance official under Minn. Stat. § 13.05, subd. 13;

(3) prepared the data inventory that names the responsible authority and describes the records and data on individuals that are maintained by the government entity under Minn. Stat. § 13.025, subd. 1;

(4) developed public access procedures under Minn. Stat. § 13.03, subd. 2; procedures to guarantee the rights of data subjects under Minn. Stat. § 13.025, subd. 3; and procedures to ensure that data on individuals are accurate and complete and to safeguard the data's security under Minn. Stat. § 13.05, subd. 5;

(5) acted in conformity with an opinion issued under Minn. Stat. § 13.072 that was sought by a government entity or another person; or

(6) provided ongoing training to government entity personnel who respond to requests under this chapter.[98]

20. Based on the record, the factors in Minn. Stat. 13.08, subd. 4(b) listed above and for the reasons discussed in the attached memorandum, the Judge concludes that a civil penalty of $300 is appropriate.

21. The Complainants in this matter have substantially prevailed. As a result, the Court of Administrative Hearings must refund the filing fee in full, less $50, and the Court's costs in conducting the matter are billed to the respondent, not to exceed $1,000.[99]

22. Any Finding of Fact more properly considered to be a Conclusion of Law is adopted herein.

23. Any portion of the accompanying Memorandum that is more properly considered to be a Conclusion of Law is incorporated herein.

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[97] Minn. Stat. § 13.085, subd. 5(a).
[98] Minn. Stat. §§ 13.08, subd. 4(b), .085, subd. 5(b).
[99] Minn. Stat. § 13.085, subd. 6(c).

Based upon these Conclusions of Law, and for the reasons explained in the accompanying Memorandum, the Judge makes the following:

ORDER

1. Pursuant to Minn. Stat. § 13.085, subd. 5(a)(4), the County must maintain procedures that ensure appropriate responses to data requests, and in so doing:

   a. Ensure appropriate ongoing communication with the public about pending data requests; and,

   b. Mitigate or avoid circumstances where the Responsible Authority, or a Designee, are, in practice or effect, the only check on their own errors, misunderstandings, or miscommunications.

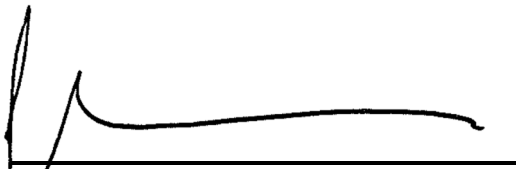
2. Pursuant to Minn. Stat. §§ 13.085, subd. 5(a)(3) and 13.08, subd. 4(b), the County shall pay a civil penalty of $300.

3. Pursuant to Minn. Stat. § 13.085, subd. 6(c) the Court will refund $950 of Complainant's filing fee.

4. Pursuant to Minn. Stat. § 13.085, subd. 6(c) the County must reimburse the Court for its costs in conducting this matter, as documented in an invoice to be sent by the Court to Respondent.

5. All other requests for relief are hereby dismissed.

Dated: November 24, 2025



CHRISTA L. MOSENG
Administrative Law Judge

Reported: Digitally Recorded
No transcript prepared

NOTICE

This Order is the final decision in this case. Any party aggrieved by this decision may seek judicial review pursuant to Minn. Stat. §§ 14.63-.69 (2024).

MEMORANDUM

I. Introduction

These proceedings arise out of a Complaint alleging that the County violated the MGDPA. The procedural history of this case is involved; a detailed discussion of the Complaint and the County's initial Response can be found in the September 15, 2025, Probable Cause Determination in this matter.[100]

Between October 2024, and July 2025, Complainants sent the County a dozen requests for government data which generally concerned a municipal project known as the East Side Corridor Project.[101] Each request resulted in communications about the request.[102] Evincing frustration, the data requests evolved to include text colored red for emphasis and significant boilerplate: preemptive clarifications, demands, statutory citations, and legal argument.[103] Complainants also sought information directly from other county staff and officials, outside of the formal data practices process established by the County. The County, in turn, required Complainants' data requests be made directly to the County Attorney and County Administrator.

The parties also detailed considerable work arising out of the requests. Complainants produced hundreds of pages documenting their work on the requests.[104] The County also devoted many hours of work over many months and across multiple departments to respond to the requests—work which continues today.[105]

In total, the record shows nine requests for data made by the Complainants (not counting repeated submissions of the same request) between October, 2024, and May, 2025.[106] The County is currently continuing to work on providing complete, responsive datasets for three of the requests.[107] Two have been completed with all responsive data provided.[108] The remaining three have been closed because the County possessed no responsive data.[109]

Two issues remained for hearing after the probable cause determination:

a. Charging a fee for inspection of public data, in violation of Minn. Stat. § 13.03, subd. 3, in response to an October 25, 2024 data request.

b. Failure to establish a procedure, consistent with the Act, to insure that all requests for government data are received and complied with

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[100] *See* Notice of Probable Cause Determination, and Order for Prehearing Conference at 2.
[101] *See generally* Exs. 21-36 (showing emails and transcripts of conversations between the parties relating to the facts of the case); Complainants' Closing Argument at 3.
[102] *See, e.g.* Ex. 1, ESC-3 – ESC-6.
[103] See, e.f., Ex. 12, ESC 58 –62 (a data request that takes less than one-half page to describe, cushioned by four-and-a-half pages of additional material).
[104] *See* Ex. 9.
[105] Test. Fry.
[106] *See, e.g.,* Complainant's Closing Argument at 3 (showing a table of all data requests involved in this matter, along with their data preservation request and the requests sent after the Complaint was filed.).
[107] Test. Fry.
[108] *See* Complainants' Closing Argument at 3.
[109] Test. Fry; *also see* Complainants' Closing Argument at 3.

in an appropriate and prompt manner, in violation of Minn. Stat. § 13.03, subd. 2(a).

At the hearing, the County conceded that it violated Minn. Stat. § 13.03, subd. 3,[110] by telling Complainants that it would charge a fee for photographing data made available for inspection, the County ultimately never charged the fee.

The sole issue that remains for substantive analysis, then, is whether the County violated Minn. Stat. § 13.03, subd. 2(a).

II. Applicable Law

The Minnesota Government Data Practices Act "governs the storage of government data and public access to that data."[111] Members of the public who want to inspect or copy public government data submit a request to do so to the relevant responsible authority or designee.[112] Responsible Authorities must, in turn, "establish procedures . . . that insure requests for government data are received and complied with in an appropriate and prompt manner."[113] The act only requires that procedures be 'established', and does not require that they be in any particular form, or even that they be written down.[114]

The question before this Court, then, is not whether every response to a data request was appropriate and prompt—though this would be relevant. Rather, the law requires that 1) "government data be made available" and 2) "that personnel responsible for making it available establish procedures that ensure it is made available."[115]

The MGDPA places significant burdens on government entities. At the same time, the weight of those burdens speaks to the import the Legislature has placed on the access to data the MGDPA requires. To balance these appropriately, both the Court of Administrative Hearings and the Commissioner of the Department of Administration have concluded that the requirement for prompt and appropriate responses to data requests does not have a mechanical or rote application. Rather, an assessment may consider factors such as: the scope or complexity of the data requested, the resources available to respond to the requests, and the government entities' communications with requestors while work on the requests takes place.[116]

III. Analysis

Complainants alleged facts that met the probable cause threshold with respect to three of the County's procedures. First, the County told Complainants it would charge a

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[110] If a person requests access to data "for the purpose of inspection, the responsible authority may not assess a charge or require the requesting person to pay a fee." Minn. Stat. § 13.03, subd. 3(a).
[111] *Webster*, 910 N.W.2d at 427.
[112] *Id*.
[113] Minn. Stat. § 13.03, subd. 2(a)).
[114] *Webster*, 910 N.W.2d at 432.
[115] *Webster*, 910 N.W.2d at 431.
[116] *See, e.g.* Depart. Admin. Adv. Ops. 14-003 (Apr. 23, 2014) (University of Minnesota); *and In the Matter of Timothy J. Coughlin vs. City of Deerwood and Deerwood Police Department*, No. 22-0305-39381, FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER (Minn. Court of Admin. Hearings Nov. 17, 2023).

fee for photographs taken by Complainants of data made available for inspection—which the County concedes violated the MGDPA. Second, the County initially maintained a procedure of responding to data requests from Complainants only in the order in which they were received. Third, the County required all of Complainants' communications regarding requests for data and the East Side Corridor Project be sent to County Attorney Jarrett and County Administrator Fry.

A. Ordering of County Responses to Multiple Data Requests

Complainants sent the County twelve distinct data requests in approximately a 10-month span. These requests ranged from extremely wide-ranging (such as the first, sent on October 25, 2024) to very small and precise (such as the May 6, 2025, request for three specific policy documents). In his reply acknowledging receipt of Complainants' April 9, 2025, data request, County Attorney Jarrett informed Complainants that the County would "begin [work on] this following the general ESC requests which is still pending. I suspect it will be several months, likely this fall, before it is ready."[117] Similar language regarding the existence of prior data requests from Complainants and a lengthy wait time for completion—couched in terms of months or seasons—also appear in the County's receipt acknowledgements of multiple subsequent requests.[118] For example, the County (1) predicting that a request for three ostensibly public-facing documents made on May 6, 2025, would be satisfied by "estimated this fall/winter," after other, larger requests were satisfied and (2) providing three pdfs on September 30, 2025. [119] These responses were neither prompt nor appropriate.

Despite statements regarding the order in which the County would respond to the Complainants' data requests, however, the record shows that responses were produced in a more flexible fashion and that the County improved its practices through the course of dealing with Complainant's requests. Data, or responses that no data exists, were provided to a total of five requests while work on the first, and largest, request continued.

County Administrator Fry testified that while the First-In-First-Out procedure was important for maintaining coordinated and orderly tracking, work, and responses—particularly for large requests that required relying on an information technology staffing resource that proved to be a bottleneck—it was not being applied as a mechanical requirement.[120]

As a result, what appears to be at issue more than the County's ordering of responses is the County's lack of effective or ongoing communication with Complainants regarding their data requests. Appropriate responses to data requests with lengthy response times should generally include *providing the requestors with updates*.[121] The record does not show a single update from the County to Complainants regarding the status of an initial request beyond acknowledgements of receipt, even when

[117] Ex. 7 at ESC-31.
[118] *See* Exs. 11, 12, *and* 15.
[119] Ex. 11 at ESC-55.
[120] Test. Fry.
[121] *See* Dept. Admin. Adv. Op. 14-003 (Apr. 23, 2014 (University of Minnesota) (discussing how response to a request for data may still be appropriate and prompt despite a wait time of five months as a result of the complexity of the request and "continual communication" with the requester about their request.).

circumstances warranted revising the timeline for production. This lack of communication, rather than the County's ordering procedure, failed to meet the County's obligation to make appropriate responses to requests.

Going forward, rather than acknowledging receipt and ignoring subsequent contact, as the County appeared to do in this case, the County's procedures must contemplate ongoing communication with the public about pending data requests, particularly when new or better information could affect an earlier-communicated anticipated-completion timeline. Simply articulating the reason for prolonged response time or delay could inform requestors' expectations and forestall future complaints.

B. Communication with County Attorney Jarrett and County Administrator Fry

The MGDPA explicitly requires that requests for government data be made *only* to the Responsible Authority for a given government entity, or their Designee.[122] At the same time, the Responsible Authority and their Designee are required by the Act to establish procedures that ensure appropriate and prompt responses to such requests.[123]

County Attorney Jarrett is the Responsible Authority for the County under the MGDPA, and the County's Data Practices Compliance Officer.[124] County Administrator Fry is the formal Designee under the MGDPA for the County's Administration department.[125]

The record of Complainants' communications with County Attorney Jarrett shows multiple responses, or lack thereof, to their requests for data that were entirely inappropriate. In the worst instances, those decisions resulted in County Administrator Fry providing a final response or novel update during her testimony.

The record of communication between County Attorney Jarrett and the Complainants is sparing. However, the record shows a pattern of construing Complainants' data requests uncharitably to excuse minimal communication and disregard for legitimate data requests and requests for updates from Complainants.

Specifically, County Attorney Jarrett closed a data request initially made on March 31, 2025, with the following reason, in substantive part: "This is not a data request. . . . . Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format to answer questions. This request will be closed." Complainants resubmitted the request, after revising it in an attempt to satisfy the thrust of the County's response by removing the question marks.

[122] Minn. Stat. § 13.03, subd. 3(a); *also see Scheffler v. City of Anoka*, 890 N.W.2d 437, 447 (Minn. 2017) (holding in part that in order for the MGDPA to have been violated, a request for data must have been made to either the Responsible Authority or their Designee).
[123] Minn. Stat. § 13.03, subd. 2(a).
[124] Ex. 100A at 33; Ex. 37 at ESC-278.
[125] Ex. 100A at 33; Ex. 37 at ESC-278.

County Attorney Jarrett again closed the request, stating: "This is not a data request as it is vague and calls for answers to questions."[126]

These responses were not appropriate.[127] Ignoring other communications about the request, including attempts to clarify or resubmit the March 31 request, was also not appropriate. These responses and non-responses were inappropriate because, first, the data request on its face is not vague and the "questions" included were precatory and superfluous to a clearly stated data request: "any and all information regarding the Joint Transportation Committee including but not limited to…."[128] Second, even if the request were vague, closing the request immediately without seeking clarification—and ignoring subsequent clarifications and communications about the request—was, in this instance, inappropriate. The County's response was inappropriate because it construed the data request unfavorably, in a light favoring expeditious summary disposition, and contrary to the purposes of the MGDPA.

The record does not show that County Attorney's Jarrett's responses to this request were the result of an established procedure for responding to data requests, except inasmuch as the procedure provided that that the request would be received and evaluated personally by County Attorney Jarrett. The failure to meaningfully respond to attempts to clarify the request, even if the County believed them to relate back to a previously addressed request, demonstrates that the County's procedures failed to ensure appropriate responses to those requests.

Additionally, standing alone, the County mistakenly sending a response intended for another pending request is understandable. The volume of communications and pending requests could easily yield an intended reply sent in an inapposite email thread. However, County Attorney Jarrett received multiple replies to his errant email response, requesting more explanation and discussing a different, conflicting response. The Responsible Authority ignored this apparent confusion, which he inadvertently created, for months. These choices resulted in Complainants mistakenly believing a data request had been closed entirely. County Administrator Fry clarified at hearing that, instead, the request was still open with the County and work on a final review of responsive documentation was underway.[129] This, again, was too little and far too late.

The record demonstrates a pattern of responses inappropriate under the MGDPA. This pattern was a consequence of a procedure that seemingly allowed the Responsible Authority to be, in apparent effect, the only check on his own errors, misunderstandings, or miscommunications in the context of an ongoing relationship with multiple active data requests and in which tensions had escalated. Accordingly, to ensure the compliance with

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[126] *See, e.g.* Steele County's Post-Hearing Brief at 8, 10; *and* Exs. 100E, E-217 Ex. 7, ESC-33. The County attorney inadvertently sent this response to a different data request, causing additional confusion among the parties. Test. of Fry. The record offers no *direct* insight into which request County Attorney Jarrett intended this response for. Of the requests pending at the time, it is more likely than not that this response was intended to relate to the March 31 request. Respondent Zimmerman emailed Jarrett at 8:16 a.m. on April 10, 2025, about receiving no response to an attempt to clarify the March 31 data request, and Jarrett sent this email at 8:24 a.m. on the same day.

[127] Ex. 100D, E-217

[128] Ex. 100D, E-205.

[129] Test. Fry.

Minn. Stat. § 13.03, subd. 2(a), the Judge will require the County to maintain procedures that ensure appropriate responses to data requests and, in so doing, address this specific shortcoming.

This requirement is intentionally phrased broadly to ensure that the County has maximum flexibility to address the issue in light of its resource constraints and without impairing the Responsible Authority's ability to carry out the responsibilities and duties of that role. This Judge contemplates a segregation of duties or internal monitor to provide stronger internal quality control over data practices responses, as an entity might implement to avoid a single point of failure in financial controls.[130] But it would be inappropriate be overly prescriptive about the best manner of implementing such internal control, or which particular circumstances require the additional eyes. The County's decision to employ an attorney whose responsibilities will include data practices reflects a good faith effort toward mitigating this specific source of MGDPA violations. That role will likely be an essential component of any procedure that satisfies the MGDPA's mandate

IV. Civil Penalty

After consideration of the factors listed in Minn. Stat. § 13.08, subd. 4(b), the Judge concludes that a $300 civil penalty under Minn. Stat. § 13.085, subd. 5(a)(3) is appropriate. The record shows that the County has designated both a Responsible Authority as well as a data practices compliance official. The County also has published current data inventory and public access procedures documents, though the record also establishes that those documents had been out of date since approximately 2020 prior to these proceedings, including showing entirely incorrect names for the relevant officials.[131] The Department of Administration did not issue an advisory opinion under Minn. Stat. § 13.072 regarding these requests. The County's ongoing training regarding MGDPA requirements reflects improvements since these proceedings began but were inadequate until the challenges presented by these data requests made their inadequacy apparent: relevant personnel have recently provided inappropriate responses to requests made under the Act.

As a result of these facts and the record as a whole, the Judge concludes that a civil penalty is warranted. The record establishes multiple violations of the MGDPA and inappropriate responses by the County in addressing the Complainants' data requests. It is laudable that the County has proactively addressed many of those issues, such as concluding it could not charge a fee for photographs of inspected data and improving its flexibility to respond to requests of varying size. However, the changes implemented during the pendency of these proceedings does not negate that the violations occurred. Similarly, mistaken or inappropriate data request responses by County Attorney Jarrett left Complainants without meaningful updates or responses to multiple requests until the hearing on their Complaint. As a result, a civil penalty is appropriate in this case.

[130] The Judge notes that it is likely that County Administrator Fry was copied on the emails sent by County Attorney Jarrett. However, the record demonstrates that she did not effectively serve as a check on the erroneous or inappropriate emails.
[131] *See* Minn. Stat. § 13.025, subd. 3; Test. Zimmerman; Test. Fry.

V. Conclusion

The miscommunication and adverse posture that developed between the parties became so fraught at times that it entirely obscured each party's good faith efforts to engage with the requirements of the MGDPA. Despite clear improvement in its practices during the course of these requests, the County's responses to the Complainants' requests failed to be appropriate on multiple occasions. The inappropriate responses were a consequence of a procedure that provided no mechanism to ensure that the County identified errors or misunderstandings by the Responsible Authority before they grew into conflict.

Complainants' communications with the County undoubtedly contributed to the adversarial atmosphere, including their use of a bespoke data request form that opens with bright red letters declaring "WE ARE FULLY EDUCATED, PREPA[]RED, WILLING, EXPERIENCED, AND VICTORIOUS IN COURT ACTIONS TO FORCE COMPLIANCE AND RECOUP CIVIL MONITARY DAM[A]GES FOR NONCOMPLIANCE!"[132] Nevertheless, conflict or an adversarial posture taken by data requestors (here, apparently taken in response to growing frustration with inappropriate responses from the County) does not relieve the County of its obligation to respond to properly submitted data requests appropriately.

The record indicates the County has, and continues to, work diligently to produce any and all data responsive to Complainants' open requests. The workload created by the requests, together with mutual miscommunications and misunderstandings, caused strain that highlighted weaknesses in the County's processes. As a consequence, the record shows that the County's processes failed to meet the requirements of the MGDPA. The County neglected to provide ongoing, timely updates regarding the status of data requests and failed to incorporate a means of validating the propriety of responses to requests. These violations warrant an order for compliance and a civil penalty, as articulated above.

C. L. M.

[132] *See, e.g.* Ex. 7 at ESC-25.

Comment #70

Formal Predetermination Comment
EAW Comment #5

Date: December 19, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Environmental Assessment Worksheet – East Side Corridor
Formal Predetermination Comment

I am submitting this comment as an individual resident directly affected by the proposed East Side Corridor (ESC). I have participated in this process for more than three years and submit this comment to preserve the record regarding predetermination, procedural violations, and the legal insufficiency of the current Environmental Assessment Worksheet (EAW).

Predetermination Under MEPA

While the EAW public comment period remains open through December 31, 2025, the City of Owatonna adopted a Resolution of Support for the ESC on December 16, 2025. This resolution is not informational. It explicitly supports a single alignment, supports right-of-way acquisition, and commits the City to cost sharing and cooperative agreements. Approval can be watched here: https://youtu.be/BnxjqBn5vOM?si=FldApK_L0bIiiVjD&t=2270 (37:50).

This action occurred after residents raised concerns regarding predetermination and MEPA compliance, which the City publicly acknowledged and entered into the public record prior to voting. The City nevertheless proceeded.

Minnesota Rules 4410.3100 prohibit governmental actions during environmental review that tend to determine subsequent development or limit alternatives or mitigation. Once commitments are made during an active EAW, environmental review can no longer fulfill its purpose of informing decisions before they are made.

Statements on the Record Demonstrating Predetermination

During deliberation, City officials made statements confirming that key decisions had already been made, including:

- The City Engineer stated that the City and County had been *"exploring via the ESC study ways to develop a north–south roadway closer to the currently **developed** and **developing** areas of Owatonna on the east side and have been doing so since **2021**,"* despite the project not being made **public until July 21, 2022.**
- Council members stated that final mitigation designs related to traffic and noise had already been completed, despite impacted residents never being given an opportunity to review or comment on those designs.

- Council members described the **EAW as a non-binding exercise** and stated that mitigation would be addressed later, while acknowledging that alignment and design decisions had already been made and that the roadway would spur development.
- A council member stated on the record that he told residents from the beginning **(December 2022)** that **there would be a roadway in this location** and that advancing the project is the right thing to do.
- Multiple council members **acknowledged they would not want the project** if it were their own home and characterized the impacts to residents as affecting "a few" for the "greater good."
- The Council President stated that the East Side Corridor is an **important project**, agreed with the preceding statements in support of the resolution, and expressed confidence in moving the project forward with mitigation **"as much as possible,"** despite acknowledging constraints on mitigation.

These statements confirm that the environmental review is being used to justify decisions already made, rather than to inform them, and that those decisions are being advanced in a manner that **prioritizes development objectives over avoidance of resident impacts**.

Environmental review under **MEPA and NEPA** does not permit a governmental unit to knowingly **subject a limited group of residents to significant, avoidable harm for generalized public benefit where feasible avoidance alternatives exist**. MEPA and NEPA exist to ensure that human activities are planned and carried out in a manner that allows people **to live in harmony with their environment.** Locating a roadway right-of-way as close as 17 feet from existing homes represents a severe and concentrated impact that fundamentally alters residential living conditions and **poses substantial risks to residents' health, safety, and quality of life.**

Residents raised concerns regarding the resolution, impacts, and procedural compliance **at the earliest possible opportunity after the resolution became publicly known**, including during a public meeting on the record at approximately 1:16:50 of the following video: https://youtu.be/BnxjqBn5vOM?si=3jcVV7xW68TOEwWs&t=4610

Cumulative Predetermination by Cooperating Governmental Units

Predetermination is not limited to the **City's December 16, 2025** resolution. A Township resolution **dated May 13, 2025** also committed support to the same alignment and is referenced in the EAW as support for advancing that alignment.

When considered together, these actions demonstrate **cumulative commitments by cooperating governmental units prior to completion of environmental review.**

FHWA Direction and Federal Undertaking

The record reflects that on April 23, 2025, the then-Steele County Engineer sent an email to the City Engineer and City and County administrators relaying that **the Federal Highway Administration (FHWA) explicitly advised against local governmental units voting on or formally committing to a specific alignment during the environmental review process.**

Despite this explicit FHWA guidance, the City of Owatonna adopted a Resolution of Support on December 16, 2025 endorsing a specific alignment, right-of-way acquisition, and cost participation while the EAW comment period remains open. The **City Engineer recommended approval** of this action with knowledge that such commitments were discouraged by FHWA and while environmental review remained incomplete.

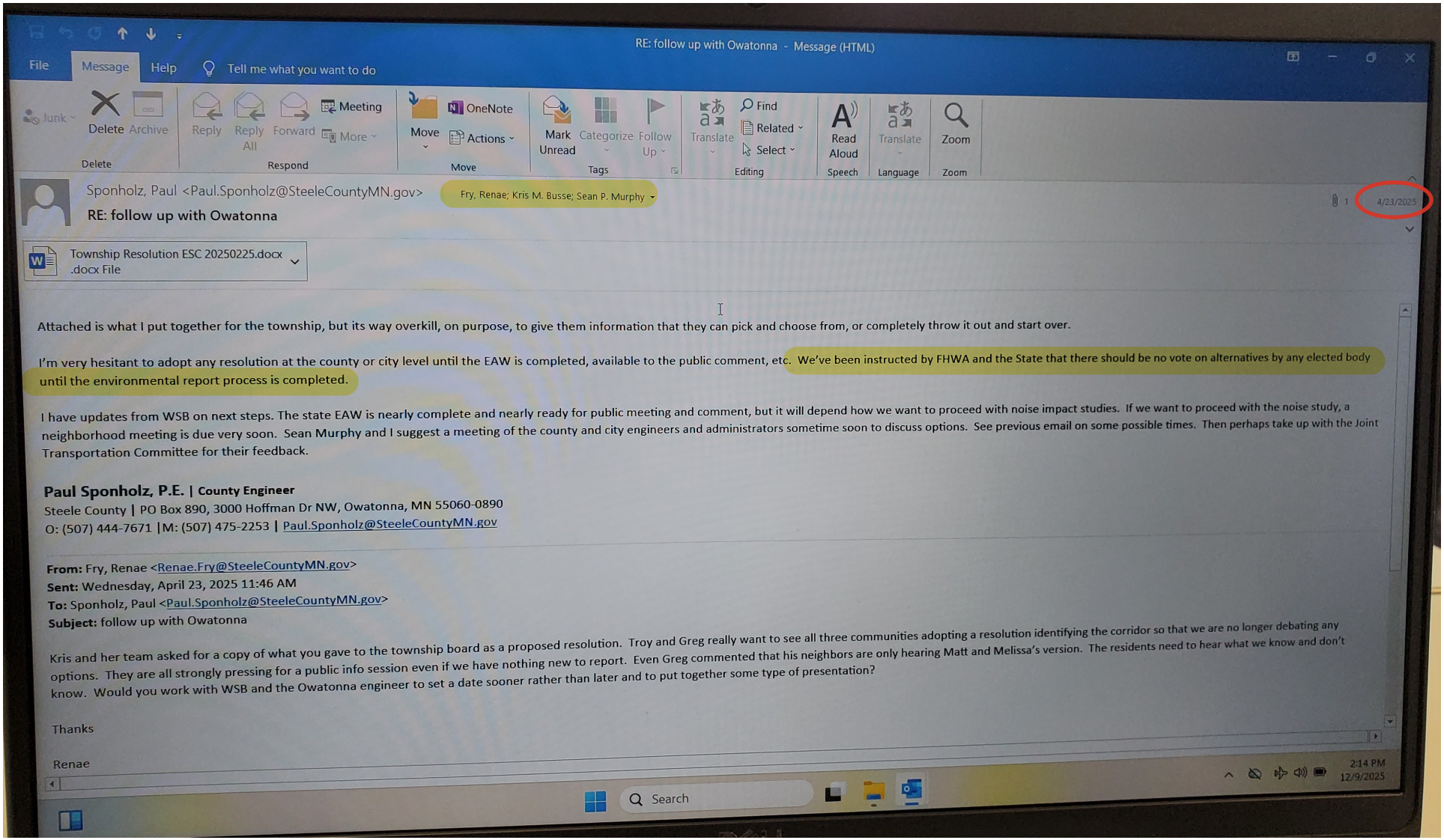
This project has also been designated a **federal undertaking**, subjecting it to NEPA and federal regulatory requirements. This **designation was not disclosed to residents during public outreach** or discussion of applicable mitigation standards, depriving residents of meaningful participation under the correct regulatory framework.

Legal Consequence

Because commitments to alignment, right-of-way acquisition, cost sharing, and reliance on mitigation have occurred during an active EAW, the current environmental review is legally deficient. The EAW cannot support a lawful Finding of No Significant Impact (FONSI). Under MEPA and NEPA, heightened review and corrective action are required.

Environmental review exists to inform decisions before commitments occur. That did not happen here.

Respectfully submitted,
Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident


RE: follow up with Owatonna - Message (HTML)
File
Message
Help
Tell me what you want to do
Junk
Delete
Archive
Reply
Reply All
Forward
Meeting
More
Move
OneNote
Actions
Mark Unread
Categorize
Follow Up
Translate
Find
Related
Select
Read Aloud
Translate
Zoom
Delete
Respond
Move
Tags
Editing
Speech
Language
Zoom
Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Fry, Renae; Kris M. Busse; Sean P. Murphy
4/23/2025
RE: follow up with Owatonna
Township Resolution ESC 20250225.docx
.docx File
Attached is what I put together for the township, but its way overkill, on purpose, to give them information that they can pick and choose from, or completely throw it out and start over.
I'm very hesitant to adopt any resolution at the county or city level until the EAW is completed, available to the public comment, etc. We've been instructed by FHWA and the State that there should be no vote on alternatives by any elected body until the environmental report process is completed.
I have updates from WSB on next steps. The state EAW is nearly complete and nearly ready for public meeting and comment, but it will depend how we want to proceed with noise impact studies. If we want to proceed with the noise study, a neighborhood meeting is due very soon. Sean Murphy and I suggest a meeting of the county and city engineers and administrators sometime soon to discuss options. See previous email on some possible times. Then perhaps take up with the Joint Transportation Committee for their feedback.
Paul Sponholz, P.E. | County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov
From: Fry, Renae <Renae.Fry@SteeleCountyMN.gov>
Sent: Wednesday, April 23, 2025 11:46 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: follow up with Owatonna
Kris and her team asked for a copy of what you gave to the township board as a proposed resolution. Troy and Greg really want to see all three communities adopting a resolution identifying the corridor so that we are no longer debating any options. They are all strongly pressing for a public info session even if we have nothing new to report. Even Greg commented that his neighbors are only hearing Matt and Melissa's version. The residents need to hear what we know and don't know. Would you work with WSB and the Owatonna engineer to set a date sooner rather than later and to put together some type of presentation?
Thanks
Renae
Search
2:14 PM
12/9/2025

RESOLUTION

TOWN BOARD OF OWATONNA TOWNSHIP

WHEREAS, the Town and the City have annually adopted an orderly Annexation Agreement to provide land areas for the growth of the City and further, to provide for the protection of agricultural and other lands within the Township from urban and suburban development and to promote an organized framework for systematic annexation, and part of that agreement, the Township does not support non-farm use of the properties in the growth area, and

WHEREAS, the Preferred Alternative is largely in the defined growth areas and has less farmland impacts than the alternatives further east, and

WHEREAS, the Preferred Alternative keeps development from leapfrogging into non developed area and keeps development near existing city limits, and

WHEREAS, the Preferred Alignment best supports existing and near-term City development while preserving farmland further east, and

WHEREAS, the city dedicated land on the east side of the North County Additions 1, 2, and 3 plats preserving land for the route, and that land is already out of farmland production, further protecting additional farmland from being removed from production through other alternative routes, and

WHEREAS, Alternatives 4 and 5 presented in the environmental documents have greater farmland impacts, and would encourage development outside of the annexation agreement development areas.

NOW, THEREFORE, BE IT RESOLVED, the township does not support any other alternatives that impact farmland outside of orderly annexation agreement areas, or that do not use already-dedicated lands for the route.

BE IT FURTHER RESOLVED the Township requests that the County and City follow their previous significant planning efforts and agreements to preserve farmland and promote the orderly growth of the City.

BE IT FURTHER RESOLVED the Township supports the selection of the preferred alternative, identified as Alternative 3 as shown in the federal and state environmental documents, and commonly referred to as the 29th Avenue alignment.

ADOPTED 5-13-25 **, 2025.**

OWATONNA TOWNSHIP BOARD
Steele County, Minnesota

By: Jeremy Kaiser
Chairman

ATTEST:

By: Theresa Ellis
Township Clerk

CERTIFICATION

I hereby certify that the above *is* a true and correct copy of a Resolution duly passed, adopted, and approved by the Owatonna Township Board on the 13th day of May, 2025.

Theresa Ellis
Township Clerk

DATE: December 16, 2025
TO: Mayor and City Council
FROM: Sean Murphy, Public Works Director
SUBJECT: Resolution 88-25: Resolution of Support - East Side Corridor

Purpose:
Requesting City Council approval of Resolution 88-25: Resolution of Support for the East Side Corridor.

Background:
Steele County and the City have been exploring, via the East Side Corridor Study, ways to develop a north-south roadway closer to the currently developed and developing areas of Owatonna since 2021. This came on the footsteps of a need for the route being identified in simultaneous, but separate transportation studies by the County and City. Steele County has taken the lead on the project and further studied alternative routes through an exhaustive Environmental Study. The County and City have engaged in multiple public engagement opportunities and considered public input. Ultimately, Alternative 3 was selected.

A Resolution of Support for the East Side Corridor memorializes the City's partnership of the project, which aligns with the City's Comprehensive Plan and follows the Orderly Annexation Agreement in place with Owatonna Township.

The City's partnership is critical for this project. The next steps will include support in project development and ultimately a cooperative agreement with Steele County.

Budget Impact:
There is no cost related to the approval of the resolution of support, but understand there will be future costs associated with the project if or when it moves forward.

Staff Recommendation:
Staff recommends approval.

Attachments:
1. Resolution 88-25: Resolution of Support - East Side Corridor

RESOLUTION NO. 88-25

RESOLUTION APPROVING MUNICIPAL SUPPORT FOR EAST SIDE CORRIDOR PROJECT

WHEREAS, Steele County has, through its Capital Improvement Plan (CIP), recommended an expansion project on the east side of Owatonna, known as the East Side Corridor, to alleviate downtown congestion, improve vehicle safety and increase multimodal transportation; and

WHEREAS, Steele County and the City have, through their separate and simultaneous 2040 Transportation Plans, recommended the addition of a north-south corridor on the east side of the Owatonna Municipal Boundary; and

WHEREAS, Steele County, in consultation with the City, commenced the East Side Corridor Study to further develop the north-south route and subsequently engaged in an extensive Environmental review process conforming to Federal Highway Administration (FHWA) and Minnesota State Rules beginning in 2022 to identify and evaluate corridor locations; and

WHEREAS, Steele County and the City, together with WSB, have engaged in community engagement as part of the study and preliminary design efforts intended to gather and consider public feedback for the proposed expansion; and

WHEREAS, Steele County received concurrence in fall of 2024 on the preferred corridor, Alternative 3, which is consistent with the location of the Steele County officially mapped corridor and is approximately 2.2 miles east of CSAH 1/Cedar Avenue/CSAH 45, with deviations north of CSAH 19 (Rose Street) and south of CR 180; and

WHEREAS, the project is consistent with the City's 2050 Comprehensive Plan; and

WHEREAS, the project conforms to the orderly annexation agreement in place between the City and Owatonna Township; and

WHEREAS, prior to advertising for contractor bids on the Project, Steele County will present the City with a Cooperative Agreement for the cost sharing of the improvements; and

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Owatonna supports the selected alternative, Alternative 3; and

NOW, THEREFORE, BE IT FURTHER RESOLVED by the City Council of the City of Owatonna that the City of Owatonna supports the County continuing with the development of final plans and right-of-way acquisition necessary for the construction of the Project; and

Passed and adopted this _____ day of _____ 2025, with the following vote:

Aye _____; No _____; Absent _____.

Approved and signed this _____ day of _____, 2025.

_____

Matthew T. Jessop, Mayor

ATTEST:

_____

Jenna L. Tuma, City Administrator/City Clerk

Comment #75

Date: December 18, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Consultant selection occurred before public disclosure and shaped environmental review

The County retained its primary engineering consultant, WSB, in December 2021—approximately seven months before the East Side Corridor project was first disclosed to the public in July 2022.

Procurement materials were not publicly disclosed

Requests for Proposals (RFPs), evaluation criteria, and scoring materials were not included in public board meeting agendas or otherwise made available to the public at the time of consultant selection.
[See Exhibit: Board agendas/minutes lacking procurement materials.]

WSB was not the lowest-cost proposer, and the basis for its selection was not disclosed to the public at the time of award. Procurement materials further reflect that WSB's scope assumed a specific corridor early in the process and included coordination with related infrastructure elements, including the 18th Street roundabout, without disclosure or analysis of cumulative impacts in the EAW.

Consultant scope confirms omitted impacts

WSB's RFP and early project communications show that the consultant was simultaneously coordinating railroad elements and developing the East Side Corridor alignment. Internal correspondence later references efforts to "decouple" the East Side Corridor from the related railroad/roundabout work.

WSB's simultaneous involvement in railroad coordination and East Side Corridor design demonstrates that these elements were functionally coupled during project development and later segmented in the environmental review without cumulative impact analysis.

Despite this known and foreseeable integration, the EAW does not evaluate cumulative railroad impacts, does not analyze alternatives that avoid railroad crossings, and does not disclose or assess the permitting constraints associated with railroad coordination. These omissions are inconsistent with the scope of work described in the RFP and render the EAW incomplete.
[See Exhibit: RFP pg12 - Railroad/Email Decoupling.]

Why this is relevant to environmental review

Engineering consultants play a central role in environmental review by:

- Defining project purpose and need
- Developing and narrowing alternatives
- Determining which impacts are studied and how

Selecting a consultant and commencing project development prior to public disclosure or participation—without transparency regarding selection criteria or scope—contributes to:

- Shaping alternatives outside public view
- Predetermination of alignment and design assumptions
- An environmental review process that follows, rather than informs, decision-making

This sequencing undermines public confidence in the neutrality and integrity of the environmental review process. The absence of procurement and scope-defining materials from the public record further limited the public's ability to understand how early project assumptions influenced the EAW, impairing meaningful public participation and informed decision-making as required under MEPA.

For the reasons stated above, the EAW is incomplete and cannot support a Finding of No Significant Impact. Accordingly, the Responsible Governmental Unit should not issue a FONSI and should require additional environmental review, up to and including preparation of an Environmental Impact Statement, before any project approval.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Steele County Agenda Item

Subject: Approve Contract with WSB for Preliminary Engineering and Environmental Documentation for the East Side Corridor.

Department: Highway

Committee Meeting Date: December 9, 2021

Board Meeting Date: December 14, 2021

Consent Agenda: ☒ Yes ☐ No **Resolution:** ☐ Yes ☒ No

Policy Committee Recommendation:

The Committee recommends award of contract to WSB

Recommendation:

Approve contract with WSB for the Preliminary Engineering and Environmental Documentation for the East Side Corridor in the amount of $286,788.00

Background *(Including Budget Impact)*:

The 2040 Steele County Transportation Plan identified the East Side Corridor, also referred to as 29th Avenue, as a needed addition to the Steele County highway system. At the September 9, 2021 Board meeting, the Board authorized the use of $223,984 Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) funds for the 29th Avenue environmental documentation (EAW). While the contract amount exceeds these funds, the Highway department has budgeted $300,000 for this work in 2022, with the balance being funded through sales tax revenues.

The Highway Department, in partnership with the City of Owatonna, requested proposals for preliminary engineering and environmental documentation from four firms, (Bolton & Menk, HR Green, SEH, and WSB). SEH chose not to submit a proposal but the other three firns did respond.

A selection committee comprised of representatives of both the County and the City engineering staffs independently evaluated and rated each proposal. Selection of the consultant was based on the following weighted criteria:

Criteria	Weight
1. Project Approach	30%
2. Qualifications, specialized experience, and professionalism	10%
3. Project team experience (especially their work on similar projects), qualifications, and availability.	15%
4. Completeness and feasibility of project work plan, tasks, and deliverables	35%
5. Proposed cost of engineering services	10%

Continued

WSB's proposal was scored the highest on these criteria by each of the reviewers.

Notable highlights and strengths in their proposal include:

- Project Understanding showed clear understanding that this project is to identify and evaluate all potential social, economic, and environmental impacts of the project and deliver the appropriate State and Federal environmental documents.
- Robust public engagement plan with both in-person meetings and open houses, as well as online project website.
- Experienced team with multiple projects of significant complexity.
- Project Manager that County and City staff have worked with on previous projects.

The three proposals ranged in price from $201,764 to $329,992. The proposal with the lowest fee missed the scope of work requested and proposed a Phase 1 which would only identify the issues to review and the additional work required would be at significant additional cost. It did not include the actual environmental documentation that was requested. The selection committee did not feel the highest cost proposal brought that much more value to the project to justify the additional cost. Therefore, the selection committee determined WSB's proposal the best technical proposal as well as the best overall value.

The City of Owatonna will participate in the cost of this work through a cooperative construction agreement, usually executed at time of project construction.

Attachments:

None

PROCEEDINGS OF THE STEELE COUNTY BOARD OF COMMISSIONERS

SPECIAL SESSION December 14, 2021

STATE OF MINNESOTA)
) ss
COUNTY OF STEELE)

The Steele County Board of Commissioners met in Special Session at 5:00 p.m. on December 14, 2021 with Commissioner's Glynn, Gnemi, Krueger, Abbe and Brady present. Also present were County Attorney Dan McIntosh, County Sheriff Lon Thiele, County Treasurer Cathy Piepho, County Engineer Greg Illka, Jail Administrator Anthony Buttera, IT Director Dave Purscell, Park & Rec/Four Seasons Director Steve Schroht, Human Resources Director Julie Johnson, County Administrator Scott Golberg and County Auditor Laura Ihrke.

Call to order and Pledge of Allegiance.

Motion by Commissioner Gnemi, seconded by Commissioner Glynn to approve the agenda with changes. Ayes all.

Motion by Commissioner Krueger, seconded by Commissioner Abbe to approve the Consent Agenda with changes. Ayes all.

A. Approve the minutes of November 23, 2021
B. Approve the minutes of November 30, 2021 Special Board Session
C. Approve Bills and Journal Entries
D. Approve Personnel Report

Resignations/Retirements/Terminations:

Name	*Position*	*Department*	*End Date*
Lyudmila (Luda) Danilyuk	Custodian	Facilities	12/13/21

E. Approve 2022 Snowmobile Grant-In-Aid Contract Agreement in the amount of $58,842.12
F. Approve Contract for Ditch Inspector Services for 2022 with the Soil & Water Conservation District
G. Approve Body Art Establishment license for Irish Eyes Studio
H. Approve Maintenance & Support Contract with TriMin for IFS (Integrated Financial System) for the period of January 1, 2022 – December 31, 2024 in the amount of $6,520
I. Approve the Resolution Authorizing the Auditor to apply for Voting Equipment Grant (VEGA-3)
J. Authorize the Chairman to sign bills on December 30, 2021
K. Approve Final Payment **Resolution** for Contract No. 213428; SAP 074-634-028, SAP 074-645-041, and CP 074-021-005 to AAA Striping Services for striping and signing revisions in the amount of $8,245.63
L. Approve Final Payment **Resolution** for Contract No. 210724; SAP 074-607-024, SAP 074-629-004 and SAP 074-643-008 to Crane Creek Asphalt for rehabilitated pavement project in the amount of $14,247.79
M. Approve Final Payment **Resolution** for Contract No. 213429; SAP 074-634-029 and SAP 074-645-040 to Heselton Construction for the roundabout project at 26th Street NW and State Avenue in the amount of $21,466.07
N. Approve the rejection of all bids received on the Surplus Equipment and to use an auction service
O. Awarded the Engineering and Environmental Documentation Contract for the East Side Corridor to WSB in the amount of 286,788.00
P. Approve Community Corrections Advisory Board Member Appointments of Anthony Buttera, Steele County Jail Administrator, and Randy Tenge, District Department of Corrections Supervisor
Q. Approve the discontinuance of Pay for Stay at the Detention Center

Motion by Commissioner Abbe, seconded by Commissioner Gnemi to approve the Farmland Lease Agreement and Authorize the Vice-Chair to sign. Upon the vote being taken 4 Commissioners voted in favor thereof, Commissioner Brady abstaining.

Human Resources Director Julie Johnson read the December Anniversary Report.

Anniversaries:

Name	*Position-Dept*	*Anniv. Date*	*Yrs. Service*
Jesse Steneman	Corporal – Detention Center	12/02/21	8
Dan McIntosh	County Attorney – Attorney's Office	12/03/21	20
Penny Miller	Technical Clerk I – Recorder's Office	12/03/21	3
Kristin Otto	Legal Admin Asst – Attorney's Office	12/04/21	4
Christine Laue	Technical Clerk I – Auditor's Office	12/07/21	1
Josh Andrist	Senior Mechanic – Highway Dept	12/07/21	6
Lacy Standke	Assessment Tech. – Assessor's Office	12/07/21	12
Rob Jarrett	Asst Cty Attorney I – Attorney's Office	12/09/21	2

Patrick Zeman	Maintenance Tech – Highway	12/14/21	1
Jake Rysavy	Director of Facilities & Fleet – F & F	12/16/21	2
Lesa Hullopeter	Chief Deputy Recorder – Recorder's Office	12/17/21	12
Samantha LeMay	Paralegal – Attorney's Office	12/17/21	3
Tony David	Road Deputy – Sheriff's Office	12/21/21	23
Jacob Miller	Road Deputy – Sheriff's Office	12/21/21	6
Lisa Risch	Records Specialist – Detention Center	12/26/21	9
Scott Mittelstaedt	Landfill Operator – Landfill	12/31/21	3
Jennifer Waggoner	Registered Nurse – Public Health Dept	12/31/21	3

Motion by Commissioner Glynn, seconded by Commissioner Gnemi to approve out of state travel for up to six individuals from IT, Maintenance and Detention Center to attend the factory demo at Accurate Controls in Ripon, Wisconsin in late January. Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Gnemi to approve the bounty for Beaver Trapping in the amount of $75.00. Ayes all.

Commissioner Gnemi offered the following **Resolution**, seconded by Commissioner Abbe

WHEREAS, The County Board of Commissioners of the County of Steele, State of Minnesota, desires to offer for sale certain parcels of land that have forfeited for non-payment of taxes: and

BE IT RESOLVED, that the parcels of tax forfeited land listed below be classified as non-conservation land; that the basic sale price of each parcel, which is on file with the Clerk of the County Board, be approved and authorization for a sale to adjacent landowners be granted, pursuant to Minn. Stat. §282.01; that the sale will be held at 10:00 a.m. on Monday, January 17, 2022, by the Steele County Auditor at the Steele County Auditor's Office in the Steele County Administration Center, for not less than the basic sale price; and that all sales shall be full payment or on the terms set forth herein.

BE IT FURTHER RESOLVED that the terms of the public sale shall be for CASH OR APPROVED CHECK and has been approved by the Steele County Board of Commissioners.

Township or City	**Description of Property for Sale**	**Basic Sale Price**	**Assessment Before Forfeiture**
Unbuildable strip of land located in Section 21 of Havana Township	07-021-3303 and 07-021-3302 Commencing at a point 716 feet North of the Southwest corner of the Southwest Quarter of Section 21, Township 107 North, Range 19 West, and running thence south to the gas pipe where the same runs thru said above described land approximately in an Easterly-Westerly direction, thence East 1 rod, thence North to a point 1 rod East of the point of beginning, thence West to the point of beginning.	$100.00	$ -0-
Unbuildable lot located in Radel Addition, City of Owatonna	17-265-0107 The West 62 feet of the South 35 feet of Lot 6, Block 1, Radel Addition No. 2, Owatonna, Minnesota	$1,000.00	$ -0-
Unbuildable lot located in Klemmer Addition, City of Owatonna	17-220-0002 Block 2, Outlot 2, Klemmer Addition	$100.00	$ -0-

Upon the vote being taken, 5 Commissioners voted in favor thereof, none absent and not voting. A copy of the Resolution is on file in the Auditor's office.

Motion by Commissioner Krueger, seconded by Commissioner Gnemi to approve the Veterans Memorial Lease Agreement with the Moonlighter's Exchange Club and authorize the Administrator to get an updated survey of the fairgrounds leased parcels. Ayes all.

Commissioner Abbe offered a **Resolution**, seconded by Commissioner Glynn supporting Steele County's participation in the opioid settlements and the state subdivision agreement (MOA) and authorize the Administrator to execute all necessary settlement documents. Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Abbe to approve passthrough funding to United Way/Safe & Drug Free Coalition to conduct tobacco free Congratulate/Compliance checks with local retailers. Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Gnemi to approve the Park & Recreation Commission recommended changes from seven to five committee members and one Steele County Commissioner liaison and to remove the district appointment requirement. Ayes all.

Commissioner Reports:

Commissioner Krueger reported on his attendance at South Country Health Alliance Joint Powers Board meeting and open house celebrating their 20-year Anniversary, AMC Conference, Public Works meeting and Work Session.

Commissioner Abbe reported on his attendance at a Work Session, Special meeting, AMC Conference, Public Safety meeting and Work Session.

Commissioner Gnemi reported on his attendance at MnPrairie meetings, Drug Court meetings, Strategic Planning Session, Work Session, AMC Conference, Public Works Board meeting, Public Utilities meeting and Christmas Party.

Commissioner Glynn reported on his attendance at a SEMREX meeting, Fair Board meeting, Extension Committee meeting and Internal Central Services meeting.

Commissioner Brady reported on his attendance at an Extension meeting, Work Sessions, 911 meeting and SE Minnesota Emergency Communications Board meeting.

The Board of Commissioner's took a recess at 5:38 p.m. until 6:00 p.m.

The Public Hearing for the 2022 Tax Levy and Budget was called to order at 6:00 p.m.

The hearing was open for public comment.

There were two individuals who expressed concern over their valuations and tax increase.

Motion by Commissioner Glynn, seconded by Commissioner Gnemi to approve continuing the 2022 Budget/Levy Public Hearing to a special meeting on December 22, 2021 at 6:00 p.m. Ayes all.

LISTING OF BILLS
12/14/2021

Advanced Correctional Heatlhcare Inc	9,529.02
Central Farm Services	21,531.74
Central Square Technologies	13,500.00
City of Blooming Prairie	2,199.77
City of Owatonna	12,500.00
Corporate Recognition Inc	2,742.53
Counties Providing Technology	4,222.00
CRK Properties LLC	6,645.36
Crysteel Truck Equipment Inc	122,971.17
Curts Truck & Diesel Svc	3,692.85
Dakota County Financial Services	3,673.50
Dell Marketing LP	4,457.47
Four Seasons Centre	4,725.00
I & S Group Inc	5,548.25
ICS Consulting LLC	7,344.76
Johnson Hardware Company	2,550.00
Kronos Incorporated	3,516.51

L & L Street Rods & Sport Trucks	2,100.00
Noodle Soup Of Weingart Design	4,089.23
Owatonna Public Utilities	30,813.56
Rochon Corporation Minnesota	37,857.00
Short Elliott Hendrickson Inc	2,528.95
Steele County Highway Dept	58,607.74
Steele County Treasurer	6,358.25
Summit Food Services LLC	11,236.09
Vanguard Appraisals Inc	20,890.00
Waste Management of Wi-Mn	49,420.67
WHKS & Co	8,021.50
Wold Architects and Engineers	8,278.72
WSB & Associates Inc	11,127.00
131 Payments less than 2,000	36,686.84
Total:	519,365.48

Motion by Commissioner Gnemi, seconded by Commissioner Krueger to adjourn to the Call of the Chair at 6:20 p.m. Ayes all.

_____
CHAIRMAN

ATTEST: _____
AUDITOR

preparing the layouts. The issues map on page 2 provides many of the key features that are to be considered including:

- Appropriate access and traffic control at all major intersections
- Farmland
- Maple Creek crossing
- Protected plant and animal species
- Railroad crossings

Task 9. Railroad Coordination

There are two railroad crossings on the project. One crossing is just east of CSAH 48, which is the current location that WSB is already coordinating. The other crossing location is at County Road 180. WSB will lead the coordination with railroad representatives and discuss impact to the railroad and possible mitigation measures to avoid lengthy reviews. In addition to railroads, WSB will coordinate with the MnDOT railroad office to ensure necessary permitting is complete. Concepts will be shared such as grade separated alternatives and at grade options.

Task 10. Preliminary Design/Concept layouts

Andy Plowman, PE, with the support of **Evan Schnitker, PE,** will lead the development of the preliminary design drawing of concepts being considered, convey those concepts to the public and detail the design engineering for technical review. The design concepts developed will be completed to the level of detail necessary to identify right of way needs and construction limits, required bridge design, hydraulic recommendations, preliminary project cost estimate and other constraints in the corridor.

Task 11. Right of Way

WSB will develop limits for each alternative and estimate the right of way needs. This will be summarized in a matrix which will help compare options.

Task 12. Funding Sources

The WSB team will provide Steele County with preliminary cost estimates needed to complete a federal funding application. Additionally, WSB will provide recommendations for other funding sources the county should consider. Given the size, expense, and regional significance of the East Side Corridor, it is likely that a variety of funding sources will make up the final funding package. We will identify potential funding sources, and as much as possible, identify potential competitive pursuits that may be sought for a portion of project funding. This will include traditional sources of transportation funding, as well as the recently passed national infrastructure bill. A funding plan technical memorandum will be prepared to document recommendations.

Task 13. Additional Tasks - Visualization

A 360-degree real-time visualization of the Owatonna East Side Corridor from SE 18th Street (CSAH 48), through the NE 26th Street (CSAH 34), and tie into Kenyon Road (CSAH 8), will be developed for Steele County by the WSB team. The direct benefit of the real-time visualization model will allow stakeholders and the public to experience the preliminary geometric layout, while changing the direction and elevation viewshed to view the model from any direction required. The roadway, bridge structures, topography, animated vehicular traffic, environmental impacts, along with permanent and temporary easements (where available) will be included within the model, out to a distance of 1,500 feet from the roadway centerline at daytime lighting conditions. As the model is being reviewed, a rendering of the view can be exported, and shared at any time as a standard *.JPEG file. The model can be viewed on a desktop, during public hearing(s) and/or meeting(s). A standalone project corridor visualization movie file (*.mov/*.mpg) will also be delivered to review the preliminary design from various viewsheds and utilized online or at subsequent meetings as Steele County sees fit.

IG

Ilkka, Gregory
To sean.murphy@ci.owatonna.mn.us
Cc Sponholz, Paul; Andrew Plowman

Reply | Reply All | Forward

Tue 9/12/2023 2:10 PM

RE Steele County, MN Agreements
Outlook item

From: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>
Sent: Thursday, June 29, 2023 8:46 AM
To: Emily Atkinson <Emily_Atkinson@cpr.ca>
Subject: RE: Steele County, MN Agreements

Good morning Emily –

We're working with MnDOT to see if we can decouple our East Side Corridor project from this roundabout project and review the diagnostic.

In the meantime, have you had any luck finding another public agency agreement with the same indemnification language?

Thanks for your time!
Greg

Greg Ilkka, P.E. | **County Engineer**

Comment #77

Date: December 19, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Environmental Assessment Worksheet – East Side Corridor
Denial of Meaningful Access to Public Data

I submit this comment as an individual resident directly affected by the proposed East Side Corridor (ESC). I have participated in this project process for multiple years and submit this comment to preserve the record regarding the denial of meaningful access to public data during the EAW process, in violation of MEPA and NEPA.

For years, I and other residents have repeatedly requested project-related public data necessary to understand and evaluate the ESC, including traffic, noise, environmental, and engineering analyses. Access to this data has been persistently delayed, restricted, or denied.

Most critically, while the County had possession of public data provided for inspection, more than 1,800 records disappeared, including records I relied upon to prepare comments for this EAW comment period. In addition, the County removed the basic software required to access the data in its native format and subsequently converted portions of the data into unusable formats that stripped metadata and other information necessary for review and verification. As a result, I do not have meaningful access to the underlying project data and have been unable to review or analyze information necessary to provide informed comments on the EAW.

I proceeded **pro se,** with a neighbor, in a contested case regarding these data access failures and substantially prevailed. The Administrative Law Judge found that the County violated the Minnesota Government Data Practices Act, imposed the **maximum civil penalty**, court costs, and ordered compliance. The Judge explicitly recognized that the County's conduct prevented meaningful public participation.
That Order is attached as Exhibit A.

Despite this ruling—and while the consequences of the County's data practices violations remained unresolved—the County opened the EAW public comment period knowing that myself and East Side Corridor Residents lacked access to essential project data. This timing deprived me of the ability to meaningfully participate in the environmental review, contrary to MEPA and NEPA requirements for early and continuous public participation.

An environmental review process cannot satisfy MEPA or NEPA when members of the public are denied access to underlying data due to missing records, inaccessible formats, and the removal of necessary software. Proceeding with an EAW under these circumstances renders public participation illusory and undermines the integrity of the environmental record.

In addition, the EAW omits or fails to include vital information that residents have long requested, including noise-related analyses. The continued withholding or omission of this

information constitutes suppression of material facts and violates MEPA and NEPA disclosure requirements.

Because I have been denied meaningful access to public data—confirmed through formal adjudication—the current EAW is procedurally deficient and cannot support any lawful environmental determination. The Responsible Governmental Unit must restore full access to all project-related public data in usable, native formats with appropriate software and provide adequate time for review before relying on the EAW for any decision.

Attachment:
Exhibit A – Office of Administrative Hearings Order (Final)

Respectfully submitted,
Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS

Court of Administrative Hearings
PO Box 64620
Saint Paul, MN 55164-0620
651-361-7900
mn.gov/cah/

November 24, 2025

VIA EMAIL ONLY
Matt Sennott
2519 Stony Creek Dr
Owatonna, MN 55060
owatonnaeastsidecorridor@gmail.com

VIA EMAIL ONLY
Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN 55060
owatonnaeastsidecorridor@gmail.com

VIA EMAIL ONLY
Mary Haasl
Margaret A. Skelton
Ratwik, Roszak & Maloney, P.A.
444 Cedar St Suite 2100
Saint Paul, MN 55101
mmh@ratwiklaw.com;
mas@ratwiklaw.com

VIA EMAIL ONLY
Robert J. Jarrett
Steele County Attorney's Office
303 S Cedar Ave
Owatonna, MN 55060
scao@steelecountymn.gov

Re: ***In the Matter of Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman vs Steele County***
CAH 22-0305-40882

Dear Parties:

Enclosed and served upon you please find the **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER** in the above-entitled matter. The Court of Administrative Hearings' file in this matter is now closed.

If you have any questions, please contact me at (651) 361-7970, cara.hunter@state.mn.us, or via facsimile at (651) 539-0310.

Sincerely,

CARA HUNTER
Legal Assistant

Enclosure

cc: Docket Coordinator
Tamar Gronvall

CAH 22-0305-40882

STATE OF MINNESOTA
COURT OF ADMINISTRATIVE HEARINGS

In the Matter of Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman vs. Steele County	**FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER**

This matter came before Administrative Law Judge Christa L. Moseng for a hearing on October 10, and 17, 2025. The first day of the hearing took place remotely and exclusively involved procedural matters. The second day of the hearing took place at the Steele County Administration Building, 630 Florence Avenue, Owatonna, Minnesota. Both parties filed written closing arguments on November 7, 2025, at which time the hearing record closed.

Owatonna East Side Corridor Residents c/o Matt Sennott & Melissa Zimmerman (Complainants) appeared on their own behalf and without counsel. Mary Haasl and Margaret Skelton, Ratwik, Roszak & Maloney, P.A., appeared on behalf of Steele County (Respondent or County).

On May 30, 2025, Complainants filed a Data Practices Complaint (Complaint) with the Court of Administrative Hearings alleging that the County violated the Minnesota Government Data Practices Act (MGDPA or Act).[1] On June 3, 2025, the undersigned issued an order requiring Complainants to file an amended version of the large exhibit attachment to the Complaint limited to MGDPA claims, serve a copy on the County, and stayed the County's response deadline until the amended attachment were served on the County.[2]

Complainants filed amended attachments to the Complaint on June 17, 2025.[3] Complainant served the MGDPA Complaint and amended supporting evidence on the County on July 16, 2025.[4] The County filed a request for an extension of their response deadline on July 25, 2025.[5] The Judge granted the County an extension of seven days for its response, and the County timely filed an Answer to the Complaint on August 15, 2025.[6]

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[1] Minn. Stat. §§ 13.01–.99 (2024).
[2] Order Ensuring Expeditious Service of Complaint Under Minn. Stat. § 13.085, subd. 2(d) (Jun. 3, 2025) (a more detailed discussion of the procedural posture is included in the attached Memorandum).
[3] Complaint and amended supporting evidence (June 17, 2025).
[4] Complainant Affidavit of Service (Jul. 18, 2025).
[5] Motion to Extend Deadline to File a Response (Jul. 25, 2025).
[6] Order Granting Extension for Time to File a Response (Aug. 1, 2025); Notice of Motion and Motion to Dismiss (Aug. 15, 2025).

On September 15, 2025, the Judge determined that Complainant's claims against Respondent for violations of Minn. Stat. § 13.03, subd. 2(a) and 3 were supported by probable cause and would proceed to a hearing.[7]

Complainant's exhibits 1-44 were received into evidence. Respondent's exhibit marked 100, with attachments marked 100A-100K, was received into evidence.

STATEMENT OF THE ISSUES

1. Did Respondent violate Minn. Stat. § 13.03, subd. 3, by charging a fee in response to a request to inspect public government data?

2. Did Respondent violate Minn. Stat. 13.03, subd. 2(a) by failing to put in place procedures that ensured prompt and appropriate responses to requests for public data?

3. If so, what remedy is appropriate to address the violation(s)?

SUMMARY OF CONCLUSIONS

Respondent violated Minn. Stat. § 13.03, subd. 3 by informing Complainants, who requested access to government data for purposes of inspection only, that payment of a $0.25 fee for any photographs taken of the data was required. The County admitted it violated the MGDPA and has remedied the violation by eliminating this procedure.

Respondent's procedure of addressing multiple requests for government data from a single requestor exclusively in the order in which those requests were received violated Minn. Stat. § 13.03, subd. 2(a), because it resulted in responses to requests that were not prompt, as required by statute. The County has remedied this by moving to a more flexible procedure that allows smaller data requests to be handled more rapidly.

Respondent's procedure for responding to requests submitted to the Responsible Authority resulted in multiple inappropriate responses to data requests in violation of Minn. Stat. § 13.03, subd. 2(a).

Based on the record and pursuant to Minn. Stat. §§ 13.085, subd. 5(a)(3) and (b), a $300 civil penalty is assessed against the County.

The Complainants have substantially prevailed in this matter. Under Minn. Stat. § 13.085, subd. 6(c), $950 of their original filing fee will be refunded and the County will be billed for the Court's costs in conducting this matter, up to a maximum of $1000.[8]

Based on the evidence in the hearing record, the Judge makes the following:

[7] Notice of Probable Cause Determination and Order for Prehearing Conference (Sep. 19, 2025).
[8] Minn. Stat. § 13.085, subd. 6(c).

FINDINGS OF FACT

I. Background

1. Steele County is located in Southeastern Minnesota and contains both the City of Owatonna and Owatonna Township within its borders.[9] The County is involved in an ongoing infrastructure project known as the East Side Corridor Project (ESC Project or Project).[10]

2. The goal of the ESC Project is to build a new road along the eastern edge of the City of Owatonna, largely within Owatonna Township.[11] The project aims to reroute traffic out of the city center and onto this new road.[12]

3. Residents who live near the proposed location of the new road have organized to advocate and provide input regarding the ESC Project.[13]

4. Complainants made multiple requests to the County for government data in connection with the ESC Project under the MGDPA.[14]

5. Robert Jarrett (County Attorney Jarrett) is the County Attorney in Steele County, the Responsible Authority for the County under the MGDPA, and the County's Data Practices Compliance Officer.[15] Renae Fry (County Administrator Fry) is the Steele County Administrator and is the formal Designee under the MGDPA for the County's Administration department.[16]

6. The County's MGDPA procedures and guidelines were formally updated by the Steele County Board on August 12, 2025.[17] Prior to that, the last update to the MGDPA procedures and guidelines took place on August 1, 2019.[18] The MGDPA procedures and guidelines form an "overarching policy" for data practices in Steele County.[19]

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[9] *See* Steele County Demographics and Geography, https://www.steelecountymn.gov/visitors/about_steele_county/facts_and_figures.php (last visited Nov. 17, 2025).
[10] *See* Exhibit (Ex.) 9.
[11] Ex. 13 at ESC-67.
[12] Ex. 43 (Showing a local news report discussing the overall purpose of the East Side Corridor Project as well as responses from the public to it.).
[13] *See* Ex. 45; *and* Complaint at 3 (May 30, 2025) (The two named Complainants, Matt Sennott and Melissa Zimmerman "are representing a group of 60 (i.e. East Side Corridor Residents) residents and 500+ petition signers who support our cause of getting access to public data via our data request(s).").
[14] *See, e.g.* Steele County's Post-Hearing Brief at 1 (Nov. 7, 2025) ("Steele County ("County") received eleven data requests and one preservation request under the Minnesota Government Data Practices Act ("MGDPA") from Complainants Matt Sennott, Melissa Zimmerman, and the Owatonna East Side Corridor Residents (hereinafter, "Complainants") from October 2024 through July 2025.").
[15] Ex. 100A at 33; Ex. 37 at ESC-278.
[16] Ex. 100A at 33; Ex. 37 at ESC-278.
[17] Test. Fry; Ex. 38 at ESC-244.
[18] Ex. 100B; Ex. 37 at ESC-196.
[19] Testimony of Renae Fry (Test. Fry).

7. Under the August 12, 2025 procedures, data requests made to the County are first routed to County Administrator Fry, who determines whether they can be answered solely with public-facing or other easily accessible data, or if further work with specific departments or staff will be necessary.[20] If a request involves only easily accessible or public facing documents, County Administrator Fry can often complete the request entirely on her own.[21]

8. More complicated requests, on the other hand, require coordinating with other departments, in particular the information technology (IT) Department.[22] The County Attorney's office is also involved in reviewing data requests to ensure coordinated, uniform responses and to review for private or otherwise non-public data.[23]

9. Currently, the IT Department employs four people, though one is assigned full-time to supporting the MNPrairie Human Services organization.[24] The County IT Department is involved in data requests because the County uses Microsoft Onedrive for backups of its government data.[25]

10. Onedrive is a "cloud-based storage tool" used to create a backup of "anything that is generated electronically within the county."[26] Every County employee has an account on Onedrive. This results in a massive database, but access to that data is limited such that each employee can access only the data needed for their work.[27] In order to search for government data across multiple, or all, individual accounts, assistance from the IT Department is required.[28]

11. The IT Department is able to perform keyword searches in order to create a pool of possibly-responsive data for a given data request.[29] This data must then be reviewed by County Administrator Fry or the County Attorney's office in order to ascertain (1) whether it is, in fact, responsive to the request in question and (2) whether it contains any data that cannot be provided under law.[30]

12. The County's policy was to require a fee of $.25 for every copy of a document a requester made, including creating the copy with their own camera.[31][32]

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[20] Test. Fry.
[21] Test. Fry.
[22] Test. Fry.
[23] Test. Fry.
[24] Test. Fry.
[25] Test. Fry.
[26] Test. Fry.
[27] Test. Fry.
[28] Test. Fry.
[29] Test. Fry.
[30] Test. Fry.
[31] The County admitted that telling requestors it would charge a fee for taking photographs of government data violated Minn. Stat. § 13.03, subd. 3.
[32] *Also see* Steele County's Post-Hearing Brief at 3 (discussing the fact that the County had already conceded the violation on this issue).

II. Requests for Data and Responses at Issue

A. ESC Communications Request

13. On October 25, 2024, Complainants requested from the County the following data:

> Any and all email correspondence since 2019 related in any way to the East Side Corridor (ESC) Project, 29th Ave, East Beltline study, and infrastructure on the E. Side of Owatonna, going to, from and between:
>
> - County commissioners
> - County staff
> - City council members
> - City staff
> - 3rd parties (including but not limited to WSB)
> - To and from any of the above and members of the public
>
> In addition, please provide any and all documents, studies, and information related to the East Side Corridor (ESC) project, 29th Ave, East Beltline study, and infrastructure on the E. Side of Owatonna *not currently (as of today) on the public-facing county website:* https://eastsidecorridor-wsbeng.hub.arcgis.com/
>
> This would include but is not limited to information used in determining the purpose and need for the East Side Corridor, 29th Ave East beltline study and infrastructure on the E. Side of Owatonna. Also, any information and documentation related to commercial developments in the area of the proposed East Side Corridor "preferred route" and "study area". This also includes any and all email correspondents[sic] between City and county officials, staff and third parties.[33]

14. Initial responses to this request from the County estimated that it "will likely need several weeks to assemble everything."[34] As a result, the parties organized that the October 25, 2024, data request would have rolling partial responses from the County, based on priorities set by the Complainants.[35]

15. The IT Department's initial searches for relevant data generated over 7600 items that required further review.[36] As of the October 2025 hearing dates, just over a year after the October 25, 2024 data request, rolling partial releases of responsive data

[33] Ex. 1 at ESC-1 - ESC-2.
[34] Ex. 27 at ESC-167.
[35] *See* Exs. 26-27.
[36] Ex. 26 at ESC-158.

by the County continue.[37] To date three releases of data have been completed by the Respondent.[38]

16. There has been conflict and confusion between the parties over multiple aspects of these reviews. These issues have included technical issues with the computers and software used to review the data and conflict over scheduling, availability, and locations for the reviews.[39]

17. These issues have stemmed from factors outside of either parties' control – such as technical issues with software or computers – or from confusion or miscommunication regarding dates, times, and places.[40]

B. Engineering Service Proposals Data Request

18. On January 13, 2025, Complainants requested:

> copies of the professional engineering service proposals for the East Side Corridor. These proposals should have been included in the commissioners' board meetings packet which is available online for the 12/14/2021 meeting, as is standard for all other projects. However, they appear to be missing.[41]

19. On January 16, 2025, County Attorney Jarrett informed Complainants that their request was ready to be picked up at the County Attorney's Office or via electronic delivery, and that the cost of the copies would be $12.50 for 50 pages total.[42]

20. Complainants paid the County $12.50 on January 22, 2025.[43]

C. Joint Transportation Committee Request

21. On January 31, 2025, Complainant Melissa Zimmerman emailed County Administrator Fry stating that she was "looking for the meeting minutes from the Joint Transportation Committee meeting referenced in the board meeting minutes."[44] After determining that County Administrator Fry was out of the office until February 10, 2025, and contacting another County staff member, her email was forwarded to County Attorney Jarrett.[45]

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[37] Test. Fry.
[38] Test. Fry.
[39] Testimony of Melissa Zimmerman (Test. Zimmerman); Testimony of Matthew Sennott (Test. Sennott); Test. Fry; *See generally* Exs. 26-28 (showing a large number of emails between the parties attempting to negotiate and coordinate the timelines and data inspections involved in this request).
[40] Test. Zimmerman; Test. Sennott; Test. Fry.
[41] Ex. 2 at ESC-7.
[42] Ex. 2 at ESC-8 – ESC-9.
[43] Ex. 100H.
[44] Ex. 3 at ESC-14; Ex. 100C.
[45] Ex. 3 at ESC-12-13; Ex. 100C.

22. On February 4, 2025, County Attorney Jarrett replied stating in relevant part that 1) "[f]rom this point forward, please direct any requests for documents/questions regarding the East Side Corridor to only myself and [County Administrator]. Fry. We will track the requests, provide data in the order it was requested, and in compliance with the Chapter 13 Government Data Practices Act" and 2) "Related to your request below for 'Joint Transportation Committee' minutes, Steele County does not maintain those minutes, so therefore does not have the minutes to provide you."[46]

23. On March 31, 2025, Complainant Zimmerman sent the County a second data request relating to the "Joint Transportation Committee."[47] The form stated:

> I am requesting any and all information regarding the Joint Transportation Committee including but not limited to:
> When was it created?
> Why was it created?
> Who created it?
> What is its purpose?
> What are the by-laws or operating procedures?
> How many members?
> Member names and terms?
> When does it meet?
> Attendance Information?
> What projects and initiatives has it worked on?
> Financial information and budget impacts?
> Committee's charter or purpose and any amendments?
> Minutes, Agendas, Files, Accounts, and any other documents that a governmental body is required to maintain?
>
> And any other information that may pertains[sic] to the Joint Transportation Committee.[48]

24. On April 1, 2025, County Attorney Jarrett replied by email, stating: "This is not a data request. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format in order to answer questions. This request will be closed."[49]

25. On April 2, 2025, Complainant Zimmerman sent the County another data request form that was identical to the March 31, 2025, request, except all question marks had been deleted.[50]

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[46] Ex. 3 at ESC-12; Ex. 100C.
[47] Ex. 3; Ex. 100D.
[48] Ex. 3; Ex. 100D.
[49] Ex. 100E
[50] *Compare* Ex. 5 at ESC-17 – ESC-18 *with* Ex. 3 at ESC-10 – ESC-11.

26. On April 8, 2025, County Administrator Fry observed Complainant Zimmerman in conversation with County Commissioner Krueger.[51] County Administrator Fry heard Commissioner Krueger explain to Complainant Zimmerman that the Joint Transportation Committee was "not a body of Steele County, it is not a committee where there is a quorum present of either Steele County Board members or City of Owatonna City Council members."[52]

27. On April 10, 2025, and April 14, 2025, Complainant Zimmerman followed up with County Attorney Jarrett by email, requesting confirmation of receipt or updates regarding the April 2, 2025 data request.[53]

28. On April 18, 2025, Complainant Zimmerman sent a third copy of the data request to both the County and the Administrator of the City of Owatonna. It was identical to the April 2, 2024, request, and the form explicitly noted that it was a resubmission of the prior request.[54]

29. County Attorney Jarrett did not reply to any of Complainant Zimmerman's follow up emails because he did not believe they were proper data requests, but rather sought answers to questions. Moreover, Jarrett "had already informed Complainant Zimmerman that the County did not maintain data on the Joint Transportation Committee."[55]

D. Noise Studies Data Request

30. On April 2, 2025, Complainant Zimmerman sent another request for data to the County, stating:

> I am requesting copies for inspection of all noise studies conducted for the East Side Corridor (ESC) project that were initiated on or after January 1, 2020. This includes, but is not limited to, initial assessments, updated analyses, modeling data, and any related reports or documentation. Please provide both draft and final versions, along with any supporting materials used in these studies.[56]

31. Complainant Zimmerman followed up on the request with County Attorney Jarrett by email on April 10, and April 14, 2025.[57]

[51] Test. Fry.
[52] Test. Fry.
[53] Ex. 5 at ESC-19 – ESC-20.
[54] Ex. 100D; Test. Fry (identifying the City of Owatonna official who received the data request).
[55] Ex. 100 at 5.
[56] Ex. 100F; Ex. 6 at ESC-22.
[57] Ex. 100G; Ex. 6 at ESC-23 – ESC-24.

32. The County looked for responsive data by having Paul Sponholtz, a county engineer who was familiar with the East Side Corridor Project, search through emails and records.[58]

33. On April 18, 2025, County Attorney Jarrett replied that "[t]he county does not have any studies or documents related to a noise study for the east side corridor at this time. Since no such data exists at this time, this data request will be closed."[59]

34. Complainant Zimmerman responded by email noting that public statements about relevant noise studies had been made by the County in the past and requesting further review for relevant data.[60] The County provided no response to the follow up email.[61]

E. Transfer of Federal Funds Request

35. On April 9, 2025, Complainants sent a data request to the County requesting to inspect:

> Any and all information relating to the transfer of federal funds from the ESC to the Main St Project. This includes all documentation, emails, written correspondence, text messages, government records, audio or video recordings, and any other data related to the transfer of these funds. Person of correspondence may include but are not limited to ATP members, Paul Sponholtz, Sean Murphy, and County Commissioner, City council, County Administrator, and City Administrator.[62]

36. On April 10, 2025, at 7:41 a.m., County Attorney Jarrett replied via email saying "Received. We begin this following the general ESC requests which is still pending. I suspect it will be several months, likely this fall, before it is ready."[63]

37. At 8:24 a.m. on that same day, County Attorney Jarrett mistakenly sent a second email to Zimmerman. The email was regarding a different data request, and so indicated to Zimmerman that Jarrett had changed his mind on the request for data on the transfer of federal funds. The message stated:

> Ms. Zimmerman, This is not a data request as it is vague and calls for answers to questions. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create

[58] Test. Fry.
[59] Ex. 100G; Ex. 6 at ESC-23.
[60] Ex. 6 at ESC-23.
[61] Ex. 100 at 6.
[62] Ex. 7 at ESC-25; Ex. 100I.
[63] Ex. 7 at ESC-31; Ex. 100J.

data, or to reorganized data into a particular format in order to answer questions.[64]

County Administrator Fry was included as a recipient on this email.[65]

38. Ms. Zimmerman replied to the second email at 8:53 a.m., stating "No, this is absolutely not vague, and there is no ambiguity whatsoever in this request. Just moments ago, you confirmed it was accepted – what changed? This data request is detailed, precise, and explicitly cites the applicable law. You are required to cite the exact provision of Minnesota Chapter 13 that you claim this request fails to meet."[66] Neither this email nor a second follow up about this data request sent on April 14, 2025, received a reply.[67]

39. County Attorney Jarrett did not realize the mistake had been made until a meeting with the County's representation in this case shortly before the hearing.[68]

40. The County has not provided the data requested to the Complainants.[69]

F. County Codes and Policies Data Request

41. On May 6, 2025, Complainants sent the County a data request form requesting inspection of:

1. Any current Code of Conduct applicable to county officials, employees, or board/commission members.

2. Any adopted Code of Ethics governing the actions and responsibilities of county personnel or officials.

3. Steele County's Conflict of Interest Policy for elected officials, employees, and appointed representatives.[70]

It also stated that "If these documents are already available online, a link to them would be appreciated. Otherwise please provide electronic copies."[71]

42. On May 8, 2025, County Attorney Jarrett replied by email stating "[r]eceived. This will be added to the current list of requests made by your group. Estimated this fall/winter."[72]

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[64] Ex. 7 at ESC-33.
[65] Ex. 7 at ESC-33.
[66] Ex. 7 at ESC-32.
[67] Ex. 7 at ESC-32;
[68] Test. Fry.
[69] Test. Fry.
[70] Ex. 11 at ESC-50.
[71] Ex. 11 at ESC-50.
[72] Ex. 11 at ESC-55.

43. On September 30, 2025, County Attorney Jarrett replied again by email, with several attachments. Jarrett stated that the attachments to his email were the County's full reply to the request, and that it would now be closed.[73] No charge was assessed for the digital copies.[74]

G. Communications with Township Data Request

44. Complainants sent another data request to the County on May 6, 2025.[75] This request was for:

> Any and all correspondence, meeting notes, emails, letters, or other communications between Steele County and any township or township officials regarding the East Side Corridor (ESC) project or related annexation matters. This includes, but is not limited to:
>
> - Objections or concerns raised by township representatives
> - Records of township approvals, statements of support, or formal positions
> - Internal or external memos discussing township responses
> - Any documentation regarding the orderly annexation agreement, including discussions related to specific parcels
> - Documentation and notes from any meetings occurring with the township
>
> The timeframe for this request is from January 1, 2021, to the present. Please advise if these records are available electronically or if any estimated costs would apply for physical copies. I am willing to clarify or narrow the scope as needed to facilitate a prompt response.[76]

45. On May 8, 2025, County Attorney Jarrett emailed: "Received. This will be added to the current list of requests made by your group. Estimated this fall/winter."[77]

46. The County has not provided the data requested to Complainants.[78]

H. Truck Traffic Data Request

47. On May 29, 2025, Complainants sent a data request to the County requesting:

> 1. Any and all traffic studies, reports, or raw traffic count data for Shady Avenue and Crestview Lane NE, with a particular focus on truck

[73] Ex. 11 at ESC-56 – ESC-57; Ex. 100K.
[74] *Id*.
[75] Ex. 12.
[76] Ex. 12 at ESC-58 – ESC-59.
[77] Ex. 12 at ESC-63;
[78] Test. Fry.

traffic volumes (e.g. counts, classifications, or percentages of heavy vehicles) currently using these roads. Please include the most recent data available, as well as historical data if relevant for comparison.

2. Any projections, Impact analyses, or modeling related to the East Side Corridor (ESC) that estimate or forecast how truck traffic on Shady Ave and Crestview Ln NE would be reduced or diverted if the ESC is built. This includes traffic modelling results, assumptions used, summary tables, and visualizations or GIS data if available.

3. If no such analysis exists regarding projected truck traffic reduction due to the ESC on these roads, please provide documentation showing that the roads were considered (or not considered) in the ESC traffic impact modeling.[79]

48. County Attorney Jarrett confirmed receipt via email on the same day, stating "We received the data request. We have several ESC requests pending, so this will be added to the pending requests. If the data exists, it will not be completed until this fall due to current volume of requests."[80]

49. On June 10, 2025, County Attorney Jarrett sent Complainants a full response to the May 29, 2025, data request, which said:

> We do not have any documentation related to this data request. As such, the request will be closed.
>
> A response from Paul:
>
> All we have is staff recollection of numerous phone calls of complaints over the years, and comments received from the public during the East Side Corridor public meetings. Also, I reviewed the state traffic counts, they don't show anything on their website traffic mapping application.
>
> Paul Sponholtz, P.E. | County Engineer.[81]

50. Any Conclusion of Law more properly designated as a Finding of Fact is incorporated herein.

51. Any portion of the accompanying Memorandum that is more properly considered a Finding of Fact is incorporated herein.

Based on these Findings of Fact, the Judge makes the following:

[79] Ex. 15 at ESC-76.
[80] Ex. 15 at ESC-82.
[81] Ex. 15 at ESC-81.

CONCLUSIONS OF LAW

1. Minn. Stat. § 13.085 authorizes the Administrative Law Judge to consider this matter and determine whether a violation of the MGDPA[82] occurred.

2. The Court of Administrative Hearings has complied with all procedural requirements under Minn. Stat. § 13.085. Both parties had proper notice of the hearing and an opportunity to be heard.

3. The decision record comprises all evidence and argument submitted until the hearing record closed.[83]

4. Requests for data and associated responses that took place after the Complaint was filed in this matter are beyond the scope of these proceedings.[84]

5. The MGDPA "regulates the collection, creation, storage, maintenance, dissemination, and access to government data in government entities."[85]

6. "Government data" means "all data collected, created, received, maintained or disseminated by any government entity regardless of its physical form, storage media or conditions of use."[86]

7. Respondent is a "government entity" subject to the requirements of the MGDPA.[87]

8. The MGDPA provides that all government data collected, created, or maintained by a government entity shall be public unless classified by statute or federal law as nonpublic or protected nonpublic, or with respect to data on individuals, as private or confidential.[88]

9. A "responsible authority" is a designated individual within a government entity responsible for the collection, use, and dissemination of government data.[89] A "designee" is "any person designated by a responsible authority to be in charge of individual files or systems containing government data and to receive and comply with requests for government data."[90]

10. Government entities and their responsible authority have an obligation to regularly update their written data access policies "no later than August 1 of each year,

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[82] Minn. Stat. §§ 13.01–.991.
[83] Minn. Stat. § 13.085, subd. 4(b).
[84] Minn. Stat. § 13.085, subd. 5(a) (limiting the Judge's final determination following an evidentiary hearing to violations "alleged in the complaint.").
[85] Minn. Stat. § 13.01, subd. 3.
[86] Minn. Stat. § 13.02, subd. 7.
[87] Minn. Stat. §§ 13.01, subd. 1, .02, subd. 7a.
[88] Minn. Stat. § 13.03, subd. 1.
[89] Minn. Stat. § 13.02, subd. 16.
[90] Minn. Stat. § 13.02, subd. 6.

and at any other time as necessary to reflect changes in personnel, procedures, or other circumstances that impact the public's ability to access data."[91]

11. Upon request, a responsible authority or designee shall permit a person to inspect and copy public government data at reasonable times and places. If access to public data is requested for purposes of inspection the responsible authority cannot assess a charge or fee for that inspection.[92]

12. The responsible authority in every government entity "shall establish procedures . . . to insure that requests for government data are received and complied with in an appropriate and prompt manner."[93]

13. In responding to requests for data, "when the procedures are followed and the requested data are not made available appropriately or promptly, the 'established procedures' do not *insure* that government data are properly available."[94] A single inappropriate or not prompt response is sufficient to support a violation of the MGDPA.[95]

14. Complainants bear the burden of proof to establish by a preponderance of the evidence that Respondent violated the MGDPA.[96]

15. The County's procedure of charging an individual who requested access to public data for purposes of inspection a fee should the individual take any photos of the data violated Minn. Stat. § 13.03, subd. 2(a).

16. The County's procedure of addressing requests for government data exclusively in the order in which they were received resulted in responses to the Complainants' requests for public data to not be promptly and appropriately complied with, in violation of Minn. Stat. § 13.03, subd. 2(a).

17. The County provided Complainants with inappropriate responses to requests for government data in violation of Minn. Stat. § 13.03, subd. 2(a) on two occasions.

18. Where the Judge has determined that a violation of the MGDPA occurred, they must take at least one of the following actions:

(1) impose a civil penalty against the respondent of up to $300;

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[91] Minn. Stat. § 13.025, subd. 2.
[92] Minn. Stat. § 13.03, subd. 3(a).
[93] Minn. Stat. § 13.03, subd. 2(a).
[94] *Webster v. Hennepin Cnty.*, 910 N.W.2d 420, 431 (Minn. 2018).
[95] *Webster*, 910 N.W.2d 420.
[96] Minn. R. 1400.7300, subp. 5 (2025). Under Minn. Stat. § 13.085, subd. 5(d), proceedings on a data practices complaint are not a contested case under Minn. Stat. ch. 14; however, the Administrative Law Judge determines that Minn. R. 1400.7300, subp. 5, articulates the correct burden of proof for a data practices case as no other standard is identified in Minn. Stat. § 13.085.

(2) issue an order compelling the respondent to comply with a provision of law that has been violated, and may establish a deadline for production of data, if necessary; and

(3) refer the complaint to the appropriate prosecuting authority for consideration of criminal charges.[97]

19. In determining whether to assess a civil penalty, this tribunal must consider whether the governmental entity has substantially complied with general data practices, including but not limited to, whether the governmental entity has:

(1) designated a responsible authority under Minn. Stat. § 13.02, subd. 16;

(2) designated a data practices compliance official under Minn. Stat. § 13.05, subd. 13;

(3) prepared the data inventory that names the responsible authority and describes the records and data on individuals that are maintained by the government entity under Minn. Stat. § 13.025, subd. 1;

(4) developed public access procedures under Minn. Stat. § 13.03, subd. 2; procedures to guarantee the rights of data subjects under Minn. Stat. § 13.025, subd. 3; and procedures to ensure that data on individuals are accurate and complete and to safeguard the data's security under Minn. Stat. § 13.05, subd. 5;

(5) acted in conformity with an opinion issued under Minn. Stat. § 13.072 that was sought by a government entity or another person; or

(6) provided ongoing training to government entity personnel who respond to requests under this chapter.[98]

20. Based on the record, the factors in Minn. Stat. 13.08, subd. 4(b) listed above and for the reasons discussed in the attached memorandum, the Judge concludes that a civil penalty of $300 is appropriate.

21. The Complainants in this matter have substantially prevailed. As a result, the Court of Administrative Hearings must refund the filing fee in full, less $50, and the Court's costs in conducting the matter are billed to the respondent, not to exceed $1,000.[99]

22. Any Finding of Fact more properly considered to be a Conclusion of Law is adopted herein.

23. Any portion of the accompanying Memorandum that is more properly considered to be a Conclusion of Law is incorporated herein.

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[97] Minn. Stat. § 13.085, subd. 5(a).
[98] Minn. Stat. §§ 13.08, subd. 4(b), .085, subd. 5(b).
[99] Minn. Stat. § 13.085, subd. 6(c).

Based upon these Conclusions of Law, and for the reasons explained in the accompanying Memorandum, the Judge makes the following:

ORDER

1. Pursuant to Minn. Stat. § 13.085, subd. 5(a)(4), the County must maintain procedures that ensure appropriate responses to data requests, and in so doing:

   a. Ensure appropriate ongoing communication with the public about pending data requests; and,

   b. Mitigate or avoid circumstances where the Responsible Authority, or a Designee, are, in practice or effect, the only check on their own errors, misunderstandings, or miscommunications.

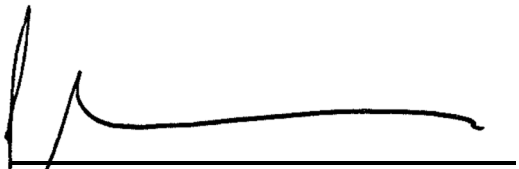
2. Pursuant to Minn. Stat. §§ 13.085, subd. 5(a)(3) and 13.08, subd. 4(b), the County shall pay a civil penalty of $300.

3. Pursuant to Minn. Stat. § 13.085, subd. 6(c) the Court will refund $950 of Complainant's filing fee.

4. Pursuant to Minn. Stat. § 13.085, subd. 6(c) the County must reimburse the Court for its costs in conducting this matter, as documented in an invoice to be sent by the Court to Respondent.

5. All other requests for relief are hereby dismissed.

Dated: November 24, 2025



CHRISTA L. MOSENG
Administrative Law Judge

Reported: Digitally Recorded
No transcript prepared

NOTICE

This Order is the final decision in this case. Any party aggrieved by this decision may seek judicial review pursuant to Minn. Stat. §§ 14.63-.69 (2024).

MEMORANDUM

I. Introduction

These proceedings arise out of a Complaint alleging that the County violated the MGDPA. The procedural history of this case is involved; a detailed discussion of the Complaint and the County's initial Response can be found in the September 15, 2025, Probable Cause Determination in this matter.[100]

Between October 2024, and July 2025, Complainants sent the County a dozen requests for government data which generally concerned a municipal project known as the East Side Corridor Project.[101] Each request resulted in communications about the request.[102] Evincing frustration, the data requests evolved to include text colored red for emphasis and significant boilerplate: preemptive clarifications, demands, statutory citations, and legal argument.[103] Complainants also sought information directly from other county staff and officials, outside of the formal data practices process established by the County. The County, in turn, required Complainants' data requests be made directly to the County Attorney and County Administrator.

The parties also detailed considerable work arising out of the requests. Complainants produced hundreds of pages documenting their work on the requests.[104] The County also devoted many hours of work over many months and across multiple departments to respond to the requests—work which continues today.[105]

In total, the record shows nine requests for data made by the Complainants (not counting repeated submissions of the same request) between October, 2024, and May, 2025.[106] The County is currently continuing to work on providing complete, responsive datasets for three of the requests.[107] Two have been completed with all responsive data provided.[108] The remaining three have been closed because the County possessed no responsive data.[109]

Two issues remained for hearing after the probable cause determination:

a. Charging a fee for inspection of public data, in violation of Minn. Stat. § 13.03, subd. 3, in response to an October 25, 2024 data request.

b. Failure to establish a procedure, consistent with the Act, to insure that all requests for government data are received and complied with

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[100] *See* Notice of Probable Cause Determination, and Order for Prehearing Conference at 2.
[101] *See generally* Exs. 21-36 (showing emails and transcripts of conversations between the parties relating to the facts of the case); Complainants' Closing Argument at 3.
[102] *See, e.g.* Ex. 1, ESC-3 – ESC-6.
[103] See, e.f., Ex. 12, ESC 58 –62 (a data request that takes less than one-half page to describe, cushioned by four-and-a-half pages of additional material).
[104] *See* Ex. 9.
[105] Test. Fry.
[106] *See, e.g.,* Complainant's Closing Argument at 3 (showing a table of all data requests involved in this matter, along with their data preservation request and the requests sent after the Complaint was filed.).
[107] Test. Fry.
[108] *See* Complainants' Closing Argument at 3.
[109] Test. Fry; *also see* Complainants' Closing Argument at 3.

in an appropriate and prompt manner, in violation of Minn. Stat. § 13.03, subd. 2(a).

At the hearing, the County conceded that it violated Minn. Stat. § 13.03, subd. 3,[110] by telling Complainants that it would charge a fee for photographing data made available for inspection, the County ultimately never charged the fee.

The sole issue that remains for substantive analysis, then, is whether the County violated Minn. Stat. § 13.03, subd. 2(a).

II. Applicable Law

The Minnesota Government Data Practices Act "governs the storage of government data and public access to that data."[111] Members of the public who want to inspect or copy public government data submit a request to do so to the relevant responsible authority or designee.[112] Responsible Authorities must, in turn, "establish procedures . . . that insure requests for government data are received and complied with in an appropriate and prompt manner."[113] The act only requires that procedures be 'established', and does not require that they be in any particular form, or even that they be written down.[114]

The question before this Court, then, is not whether every response to a data request was appropriate and prompt—though this would be relevant. Rather, the law requires that 1) "government data be made available" and 2) "that personnel responsible for making it available establish procedures that ensure it is made available."[115]

The MGDPA places significant burdens on government entities. At the same time, the weight of those burdens speaks to the import the Legislature has placed on the access to data the MGDPA requires. To balance these appropriately, both the Court of Administrative Hearings and the Commissioner of the Department of Administration have concluded that the requirement for prompt and appropriate responses to data requests does not have a mechanical or rote application. Rather, an assessment may consider factors such as: the scope or complexity of the data requested, the resources available to respond to the requests, and the government entities' communications with requestors while work on the requests takes place.[116]

III. Analysis

Complainants alleged facts that met the probable cause threshold with respect to three of the County's procedures. First, the County told Complainants it would charge a

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[110] If a person requests access to data "for the purpose of inspection, the responsible authority may not assess a charge or require the requesting person to pay a fee." Minn. Stat. § 13.03, subd. 3(a).
[111] *Webster*, 910 N.W.2d at 427.
[112] *Id*.
[113] Minn. Stat. § 13.03, subd. 2(a)).
[114] *Webster*, 910 N.W.2d at 432.
[115] *Webster*, 910 N.W.2d at 431.
[116] *See, e.g.* Depart. Admin. Adv. Ops. 14-003 (Apr. 23, 2014) (University of Minnesota); *and In the Matter of Timothy J. Coughlin vs. City of Deerwood and Deerwood Police Department*, No. 22-0305-39381, FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER (Minn. Court of Admin. Hearings Nov. 17, 2023).

fee for photographs taken by Complainants of data made available for inspection—which the County concedes violated the MGDPA. Second, the County initially maintained a procedure of responding to data requests from Complainants only in the order in which they were received. Third, the County required all of Complainants' communications regarding requests for data and the East Side Corridor Project be sent to County Attorney Jarrett and County Administrator Fry.

A. Ordering of County Responses to Multiple Data Requests

Complainants sent the County twelve distinct data requests in approximately a 10-month span. These requests ranged from extremely wide-ranging (such as the first, sent on October 25, 2024) to very small and precise (such as the May 6, 2025, request for three specific policy documents). In his reply acknowledging receipt of Complainants' April 9, 2025, data request, County Attorney Jarrett informed Complainants that the County would "begin [work on] this following the general ESC requests which is still pending. I suspect it will be several months, likely this fall, before it is ready."[117] Similar language regarding the existence of prior data requests from Complainants and a lengthy wait time for completion—couched in terms of months or seasons—also appear in the County's receipt acknowledgements of multiple subsequent requests.[118] For example, the County (1) predicting that a request for three ostensibly public-facing documents made on May 6, 2025, would be satisfied by "estimated this fall/winter," after other, larger requests were satisfied and (2) providing three pdfs on September 30, 2025. [119] These responses were neither prompt nor appropriate.

Despite statements regarding the order in which the County would respond to the Complainants' data requests, however, the record shows that responses were produced in a more flexible fashion and that the County improved its practices through the course of dealing with Complainant's requests. Data, or responses that no data exists, were provided to a total of five requests while work on the first, and largest, request continued.

County Administrator Fry testified that while the First-In-First-Out procedure was important for maintaining coordinated and orderly tracking, work, and responses—particularly for large requests that required relying on an information technology staffing resource that proved to be a bottleneck—it was not being applied as a mechanical requirement.[120]

As a result, what appears to be at issue more than the County's ordering of responses is the County's lack of effective or ongoing communication with Complainants regarding their data requests. Appropriate responses to data requests with lengthy response times should generally include *providing the requestors with updates*.[121] The record does not show a single update from the County to Complainants regarding the status of an initial request beyond acknowledgements of receipt, even when

[117] Ex. 7 at ESC-31.
[118] *See* Exs. 11, 12, *and* 15.
[119] Ex. 11 at ESC-55.
[120] Test. Fry.
[121] *See* Dept. Admin. Adv. Op. 14-003 (Apr. 23, 2014 (University of Minnesota) (discussing how response to a request for data may still be appropriate and prompt despite a wait time of five months as a result of the complexity of the request and "continual communication" with the requester about their request.).

circumstances warranted revising the timeline for production. This lack of communication, rather than the County's ordering procedure, failed to meet the County's obligation to make appropriate responses to requests.

Going forward, rather than acknowledging receipt and ignoring subsequent contact, as the County appeared to do in this case, the County's procedures must contemplate ongoing communication with the public about pending data requests, particularly when new or better information could affect an earlier-communicated anticipated-completion timeline. Simply articulating the reason for prolonged response time or delay could inform requestors' expectations and forestall future complaints.

B. Communication with County Attorney Jarrett and County Administrator Fry

The MGDPA explicitly requires that requests for government data be made *only* to the Responsible Authority for a given government entity, or their Designee.[122] At the same time, the Responsible Authority and their Designee are required by the Act to establish procedures that ensure appropriate and prompt responses to such requests.[123]

County Attorney Jarrett is the Responsible Authority for the County under the MGDPA, and the County's Data Practices Compliance Officer.[124] County Administrator Fry is the formal Designee under the MGDPA for the County's Administration department.[125]

The record of Complainants' communications with County Attorney Jarrett shows multiple responses, or lack thereof, to their requests for data that were entirely inappropriate. In the worst instances, those decisions resulted in County Administrator Fry providing a final response or novel update during her testimony.

The record of communication between County Attorney Jarrett and the Complainants is sparing. However, the record shows a pattern of construing Complainants' data requests uncharitably to excuse minimal communication and disregard for legitimate data requests and requests for updates from Complainants.

Specifically, County Attorney Jarrett closed a data request initially made on March 31, 2025, with the following reason, in substantive part: "This is not a data request. . . . . Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format to answer questions. This request will be closed." Complainants resubmitted the request, after revising it in an attempt to satisfy the thrust of the County's response by removing the question marks.

[122] Minn. Stat. § 13.03, subd. 3(a); *also see Scheffler v. City of Anoka*, 890 N.W.2d 437, 447 (Minn. 2017) (holding in part that in order for the MGDPA to have been violated, a request for data must have been made to either the Responsible Authority or their Designee).
[123] Minn. Stat. § 13.03, subd. 2(a).
[124] Ex. 100A at 33; Ex. 37 at ESC-278.
[125] Ex. 100A at 33; Ex. 37 at ESC-278.

County Attorney Jarrett again closed the request, stating: "This is not a data request as it is vague and calls for answers to questions."[126]

These responses were not appropriate.[127] Ignoring other communications about the request, including attempts to clarify or resubmit the March 31 request, was also not appropriate. These responses and non-responses were inappropriate because, first, the data request on its face is not vague and the "questions" included were precatory and superfluous to a clearly stated data request: "any and all information regarding the Joint Transportation Committee including but not limited to…."[128] Second, even if the request were vague, closing the request immediately without seeking clarification—and ignoring subsequent clarifications and communications about the request—was, in this instance, inappropriate. The County's response was inappropriate because it construed the data request unfavorably, in a light favoring expeditious summary disposition, and contrary to the purposes of the MGDPA.

The record does not show that County Attorney's Jarrett's responses to this request were the result of an established procedure for responding to data requests, except inasmuch as the procedure provided that that the request would be received and evaluated personally by County Attorney Jarrett. The failure to meaningfully respond to attempts to clarify the request, even if the County believed them to relate back to a previously addressed request, demonstrates that the County's procedures failed to ensure appropriate responses to those requests.

Additionally, standing alone, the County mistakenly sending a response intended for another pending request is understandable. The volume of communications and pending requests could easily yield an intended reply sent in an inapposite email thread. However, County Attorney Jarrett received multiple replies to his errant email response, requesting more explanation and discussing a different, conflicting response. The Responsible Authority ignored this apparent confusion, which he inadvertently created, for months. These choices resulted in Complainants mistakenly believing a data request had been closed entirely. County Administrator Fry clarified at hearing that, instead, the request was still open with the County and work on a final review of responsive documentation was underway.[129] This, again, was too little and far too late.

The record demonstrates a pattern of responses inappropriate under the MGDPA. This pattern was a consequence of a procedure that seemingly allowed the Responsible Authority to be, in apparent effect, the only check on his own errors, misunderstandings, or miscommunications in the context of an ongoing relationship with multiple active data requests and in which tensions had escalated. Accordingly, to ensure the compliance with

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[126] *See, e.g.* Steele County's Post-Hearing Brief at 8, 10; *and* Exs. 100E, E-217 Ex. 7, ESC-33. The County attorney inadvertently sent this response to a different data request, causing additional confusion among the parties. Test. of Fry. The record offers no *direct* insight into which request County Attorney Jarrett intended this response for. Of the requests pending at the time, it is more likely than not that this response was intended to relate to the March 31 request. Respondent Zimmerman emailed Jarrett at 8:16 a.m. on April 10, 2025, about receiving no response to an attempt to clarify the March 31 data request, and Jarrett sent this email at 8:24 a.m. on the same day.

[127] Ex. 100D, E-217

[128] Ex. 100D, E-205.

[129] Test. Fry.

Minn. Stat. § 13.03, subd. 2(a), the Judge will require the County to maintain procedures that ensure appropriate responses to data requests and, in so doing, address this specific shortcoming.

This requirement is intentionally phrased broadly to ensure that the County has maximum flexibility to address the issue in light of its resource constraints and without impairing the Responsible Authority's ability to carry out the responsibilities and duties of that role. This Judge contemplates a segregation of duties or internal monitor to provide stronger internal quality control over data practices responses, as an entity might implement to avoid a single point of failure in financial controls.[130] But it would be inappropriate be overly prescriptive about the best manner of implementing such internal control, or which particular circumstances require the additional eyes. The County's decision to employ an attorney whose responsibilities will include data practices reflects a good faith effort toward mitigating this specific source of MGDPA violations. That role will likely be an essential component of any procedure that satisfies the MGDPA's mandate

IV. Civil Penalty

After consideration of the factors listed in Minn. Stat. § 13.08, subd. 4(b), the Judge concludes that a $300 civil penalty under Minn. Stat. § 13.085, subd. 5(a)(3) is appropriate. The record shows that the County has designated both a Responsible Authority as well as a data practices compliance official. The County also has published current data inventory and public access procedures documents, though the record also establishes that those documents had been out of date since approximately 2020 prior to these proceedings, including showing entirely incorrect names for the relevant officials.[131] The Department of Administration did not issue an advisory opinion under Minn. Stat. § 13.072 regarding these requests. The County's ongoing training regarding MGDPA requirements reflects improvements since these proceedings began but were inadequate until the challenges presented by these data requests made their inadequacy apparent: relevant personnel have recently provided inappropriate responses to requests made under the Act.

As a result of these facts and the record as a whole, the Judge concludes that a civil penalty is warranted. The record establishes multiple violations of the MGDPA and inappropriate responses by the County in addressing the Complainants' data requests. It is laudable that the County has proactively addressed many of those issues, such as concluding it could not charge a fee for photographs of inspected data and improving its flexibility to respond to requests of varying size. However, the changes implemented during the pendency of these proceedings does not negate that the violations occurred. Similarly, mistaken or inappropriate data request responses by County Attorney Jarrett left Complainants without meaningful updates or responses to multiple requests until the hearing on their Complaint. As a result, a civil penalty is appropriate in this case.

[130] The Judge notes that it is likely that County Administrator Fry was copied on the emails sent by County Attorney Jarrett. However, the record demonstrates that she did not effectively serve as a check on the erroneous or inappropriate emails.
[131] *See* Minn. Stat. § 13.025, subd. 3; Test. Zimmerman; Test. Fry.

V. Conclusion

The miscommunication and adverse posture that developed between the parties became so fraught at times that it entirely obscured each party's good faith efforts to engage with the requirements of the MGDPA. Despite clear improvement in its practices during the course of these requests, the County's responses to the Complainants' requests failed to be appropriate on multiple occasions. The inappropriate responses were a consequence of a procedure that provided no mechanism to ensure that the County identified errors or misunderstandings by the Responsible Authority before they grew into conflict.

Complainants' communications with the County undoubtedly contributed to the adversarial atmosphere, including their use of a bespoke data request form that opens with bright red letters declaring "WE ARE FULLY EDUCATED, PREPA[]RED, WILLING, EXPERIENCED, AND VICTORIOUS IN COURT ACTIONS TO FORCE COMPLIANCE AND RECOUP CIVIL MONITARY DAM[A]GES FOR NONCOMPLIANCE!"[132] Nevertheless, conflict or an adversarial posture taken by data requestors (here, apparently taken in response to growing frustration with inappropriate responses from the County) does not relieve the County of its obligation to respond to properly submitted data requests appropriately.

The record indicates the County has, and continues to, work diligently to produce any and all data responsive to Complainants' open requests. The workload created by the requests, together with mutual miscommunications and misunderstandings, caused strain that highlighted weaknesses in the County's processes. As a consequence, the record shows that the County's processes failed to meet the requirements of the MGDPA. The County neglected to provide ongoing, timely updates regarding the status of data requests and failed to incorporate a means of validating the propriety of responses to requests. These violations warrant an order for compliance and a civil penalty, as articulated above.

C. L. M.

[132] *See, e.g.* Ex. 7 at ESC-25.

Comment #84

Response to County Request to Select Among Three Noise Options

I. Purpose of This Comment

This comment is submitted in direct response to the Steele County's request that East Side Corridor (ESC) residents select one of three noise "options" presented in the Environmental Assessment Worksheet (EAW). As explained below, none of the three options constitutes lawful noise mitigation, and the County's framing of these options does not satisfy the requirements of MEPA or NEPA.

II. None of the Three Options Presented Constitutes Noise Mitigation

The three noise "options" presented by the County consist of landscaping, shallow grading, or fencing. None of these options meets recognized state or federal standards for noise mitigation:

- **Landscaping** is explicitly not noise mitigation under state and federal guidance.
- A **6-foot fence** does not block line of sight, does not reduce traffic noise, and does not comply with recognized noise-abatement standards.
    - Placing a fence on the property line and shifting responsibility to residents **imposes additional burdens on residents already disproportionately harmed by the project**, which is **not permitted under MEPA or NEPA**.
    - Additionally, locating a fence at the property line or relying on private property for noise mitigation would constitute a **taking** and would **trigger eminent domain and condemnation**. As HUD has advised in communications regarding this corridor, even minimal encroachment onto residential property would likely result in the **condemnation and displacement of homes along the route**, particularly given the proximity of the proposed roadway to existing residences.

Because none of the three options qualifies as mitigation, residents cannot lawfully "choose" among them.

III. Claimed Exemptions Do Not Relieve the County of Its Duty to Address Noise Impacts

While the County may claim exemption from certain numeric upper noise thresholds, it is **not exempt from identifying, evaluating, and mitigating noise impacts**. The EAW **does not include or analyze the project's noise study** and therefore fails to disclose, assess, or evaluate mitigation for the substantial noise impacts associated with the project. This omission renders

the EAW **incomplete and insufficient** under MEPA and NEPA.

IV. Substantial Noise Impacts Are Documented

The County's own noise studies, omitted from the EAW, show that the proposed project will result in:

- **371 homes experiencing noise impacts**;
- **82 homes experiencing substantial noise impacts**; and
- **57 homes within the North Country subdivision experiencing substantial noise impacts**.

These impacts are permanent and unavoidable under the proposed alignment.

V. The Noise Study Identifies Mitigation Equivalent to a 20-Foot Noise Wall

The EAW's noise analysis identifies mitigation of a **20-foot noise wall** as **reasonable, feasible, and recommended**. The need to contemplate mitigation of this scale underscores the severity of the project's impacts.

VI. The Project Remains a Federal Undertaking

Despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor constitutes a **federal undertaking**. Accordingly, the County remains subject to applicable federal requirements, including **23 C.F.R. Part 772**, as well as Minnesota noise regulations such as **Minn. R. 7030**. Additionally, this project was already funded in part or in whole with CRRSA money, which are federal funds.

VII. Avoidance Must Be Considered Before Residents Are Asked to Choose Mitigation

Under MEPA and NEPA, environmental impacts must be addressed in the following order:

1. **Avoid**
2. Minimize
3. Mitigate

Avoidance is **feasible and reasonable**, meets the project's stated criteria, and would prevent the documented noise impacts altogether, as reflected in communications from the County

Engineer to MnDOT and other internal communications. Avoidance was withheld because it interferes with development agreements and utility planning involving the City of Owatonna, Owatonna Township, and Owatonna Public Utilities—considerations that do **not** lawfully justify bypassing avoidance under MEPA or NEPA. A transportation project must be driven by a **demonstrated transportation need**, not development objectives. As documented in other comments, the asserted transportation needs collapse when accurate and up-to-date traffic data is applied.

Residents cannot be required to select among mitigation measures before avoidance has been fully evaluated.

VIII. Conditional Response to the County's Request

In response to the County's request to select among the three presented options, **Owatonna East Side Corridor Residents cannot select any of them**, as none constitutes lawful mitigation.

If the County refuses to pursue avoidance, residents are willing to accept is a **noise berm** that complies with **Minn. R. 7030** and **23 C.F.R. Part 772**, spans the **full length of the affected subdivision**, and meets the following minimum criteria:

- Blocks line of sight, equivalent in function to a **20-foot noise wall**;
- Meets applicable MnDOT engineering standards, including but not limited to **1:3 or 1:4 slope ratios**;
- Fully addresses stormwater impacts without increasing runoff onto adjacent properties;
- Is entirely contained on public property and complies with setbacks;
- Requires no private easements or encroachment; and
- Excludes any roadway connections to Timberwood Lane or Fox Hollow Lane.

Any use of residential property—**even temporary** for construction, grading, access, utilities, or drainage—would constitute a taking and trigger eminent domain and condemnation proceedings, as acknowledged on the County's own website.

If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative mitigation measure that achieves the same functional performance, such as mitigation equivalent to a **20-foot noise wall** identified in the noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that **avoidance is the legally required first option**.

IX. Deer Trail Berm Comparison Does Not Cure the Impacts

The EAW references berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred after the roadway existed. Here, the proposed project represents a highway encroaching on established homes and therefore requires heightened protections under MEPA and NEPA. Therefore the above berm is the "equivalent".

Residents have already compromised. We began at 34th Avenue. We publicly proposed a hybrid alternative. The County privately withheld from the public, Alternative 3B. **We are not willing to compromise on safety, health, and quality of life.**

Residents did not choose to impose a roadway through subdivisions that have existed for decades based on a long-abandoned plan. That decision was made by **Steele County, the City of Owatonna, Owatonna Township, and WSB**, through a process that excluded the most impacted residents—culminating in a request that those residents select among three options that **do not meet regulatory requirements or provide meaningful protection**.

Avoidance prevents the impacts.

X. Significant Impacts Preclude a FONSI

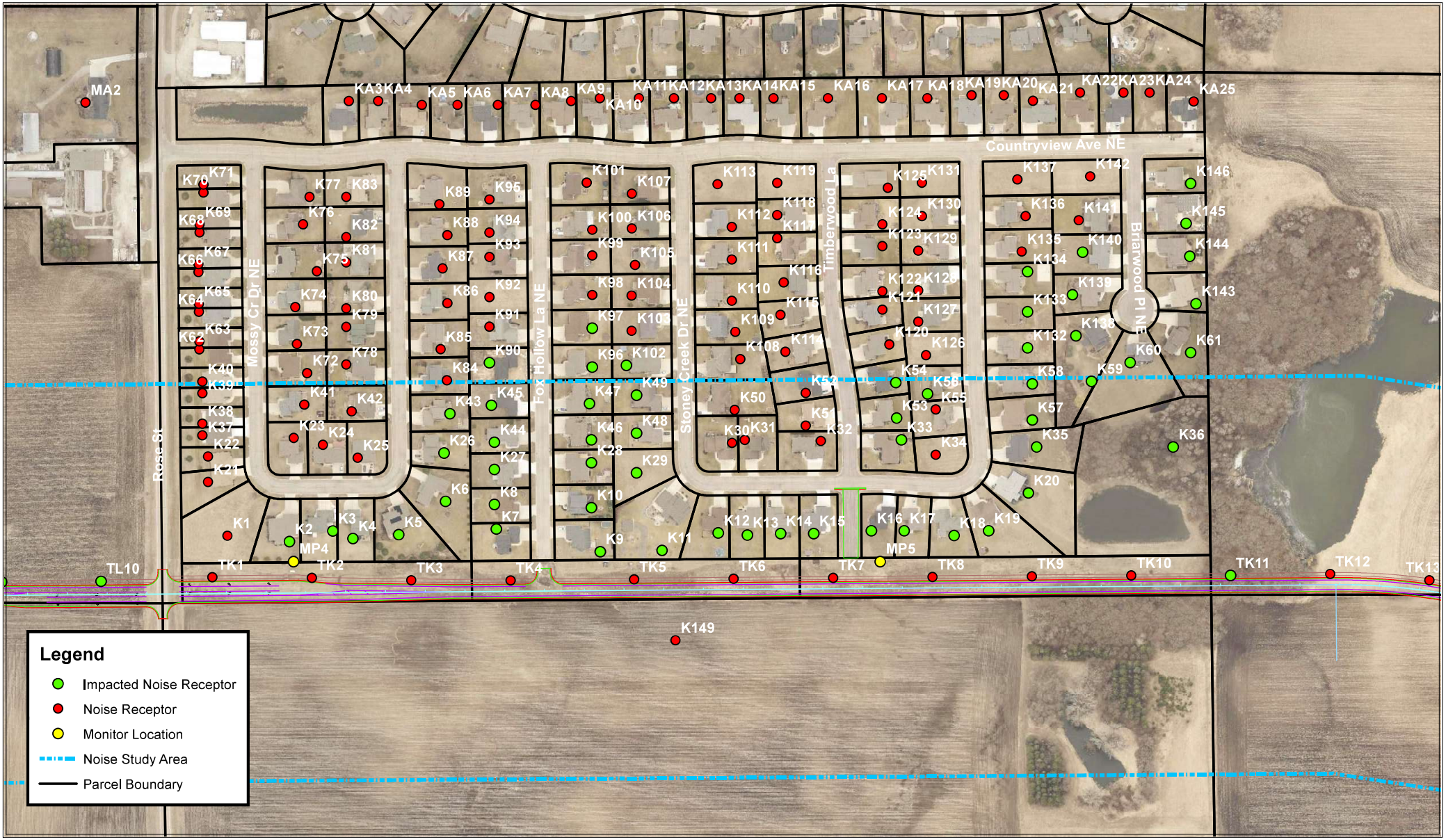
The need to contemplate mitigation equivalent to a 20-foot noise barrier constitutes an admission of **significant environmental impacts**. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an **Environmental Impact Statement (EIS)**.

XI. Conclusion

Because none of the three noise options presented constitutes lawful mitigation, because avoidance has not been lawfully evaluated, and because the project will cause significant environmental impacts, **Owatonna East Side Corridor Residents** request that the EAW be found inadequate and that an **Environmental Impact Statement (EIS)** be prepared.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Attached:
North Country impacted homes
Excerpts from Steele County Noise Study documenting a 20 foot noise wall is reasonable, feasible, and recommended.



Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-6: Noise Receptors

Date: 3/19/2024

Traffic Noise Analysis Report
Owatonna East Side Corridor
State Aid Project Number 074-070-009

DRAFT

Prepared for Steele County

12/14/2024

DRAFT

HZUNITED

designed to meet the MnDOT design goal of 7 dBA for 1 impacted receptor, and to provide 5 dBA sound level reduction for each impacted receptor. The walls were located between the roadway and the shared use trail. The wall extents were placed based on traffic sight lines[5] and stopping sight distance requirements[6] based on FHWA and MnDOT standards.

- **Wall KA:** A 340 ft long wall (Wall KA) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors K150-. Results are summarized below:
  - **20 ft Wall:** A 340 ft long, 20 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **15 ft Wall:** A 340 ft long, 15 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **10 ft Wall:** A 340 ft long, 10 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **8 ft Wall:** A 340 ft long, 8 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.
  - **6 ft Wall:** A 340 ft long, 6 ft high wall (Wall KA) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

- **Wall K1:** A 2430 ft long wall (Wall K1) was evaluated at varied wall heights for cost effectiveness to abate noise levels for receptors K1-K4. Results are summarized below:
  - **20 ft Wall:** A 2430 ft long, 20 ft high wall (Wall K1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 24 benefited receptors. The estimated wall cost is $72,900 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **10 ft Wall:** A 2430 ft long, 10 ft high wall (Wall K1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 14 benefited receptors. The estimated wall cost is $62,486 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **8 ft Wall:** A 2430 ft long, 8 ft high wall (Wall K1) was evaluated for cost effectiveness. There is at least one receptor with 7 dBA reduction thus the wall meets the noise reduction goal. There are 9 benefited receptors. The estimated wall cost is $77,760 per receptor. The wall meets the Cost Effectiveness standard and is recommended for further evaluation.
  - **6 ft Wall:** A 2430 ft long, 6 ft high wall (Wall K1) was evaluated for cost effectiveness. There is not at least one receptor with 7 dBA reduction, thus the wall does not meet the noise reduction goal and is not recommended for further evaluation.

NSA L: There are no impacted existing receptors in NSA L, so no barrier analysis was performed for this location.

[5] *MnDOT Field Design Guide Chapter 6, Exhibit 6E-16 and MnDOT Road Design Manual Chapter 5, Figure 5-2.02B*

[6] FHWA Railroad Crossing Handbook, Table C-1

ensure the desired compatibility between the proposed East Side Corridor and potential future development.

3.0 Construction Noise

The construction activities associated with implementation of the proposed project will result in increased noise levels relative to existing conditions. These impacts will primarily be associated with construction equipment.

The following table (Table 5) shows peak noise levels monitored at 50 feet from various types of construction equipment. This equipment is primarily associated with site grading/site preparation, which is generally the roadway construction phase associated with the greatest noise levels.

Table 5: Typical construction noise [Source: EPA and FHWA]

Equipment Type	Manufacturers Sampled	Total Number of Models in Sample	Peak Noise Level (dBA)	
			Range	Average
Backhoes	5	6	74-92	83
Front Loaders	5	30	75-96	85
Dozers	8	41	65-95	85
Graders	3	15	72-92	84
Scrapers	2	27	76-98	87
Pile Drivers	N/A	N/A	95-105	101

Elevated noise levels are, to a degree, unavoidable for this type of project. Scott County and its contractor(s) are exempt from local noise ordinances, it is the practice to require contractor(s) to comply with applicable local noise restrictions and ordinances to the extent that is reasonable. Advanced notice will be provided to affected communities of any planned abnormally loud construction activities. It is anticipated that night construction may sometimes be required to minimize traffic impacts and to improve safety. However, construction will be limited to daytime hours as much as possible. If necessary, a detailed nighttime construction mitigation plan will be developed during the project final design stage.

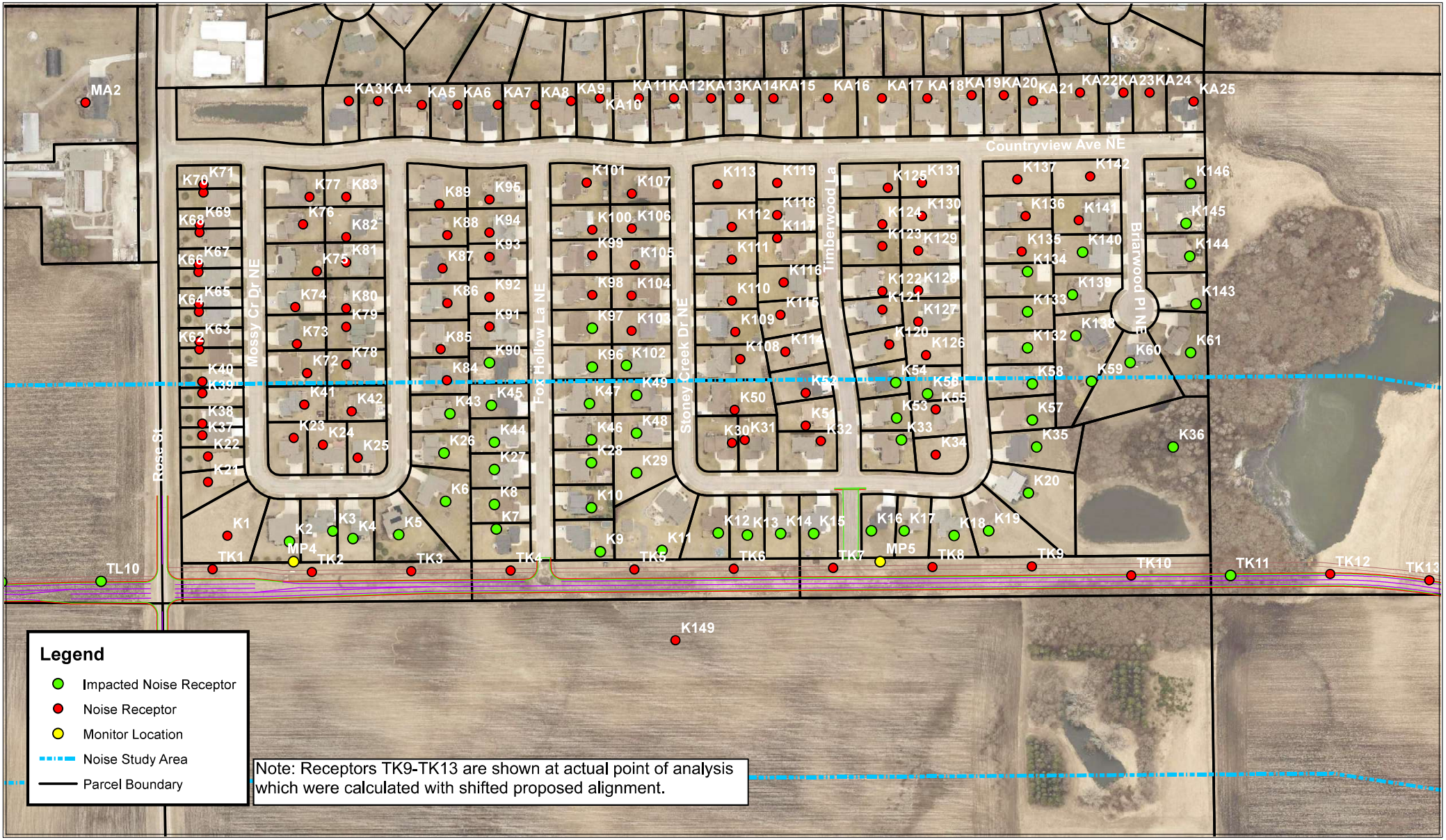
Any associated high-impact equipment noise, such as pile driving, pavement sawing, or jack hammering, will be unavoidable with construction of the proposed project. The use of this high-impact noise equipment will be prohibited during nighttime hours.

4.0 Conclusions

Based on the analysis completed using the guidelines and procedures laid out by the MnDOT Noise Requirements, there are multiple walls that were determined to be reasonable and feasible and are being advanced for public solicitation for implementation. Walls which are determined to be reasonable/feasible, but where Steele County has the deciding vote, as determined by MnDOT noise public solicitation standards, will not be advanced for public solicitation. Two walls will be advanced for public solicitation (Wall K1, Wall TI-2).

Statement of Likelihood

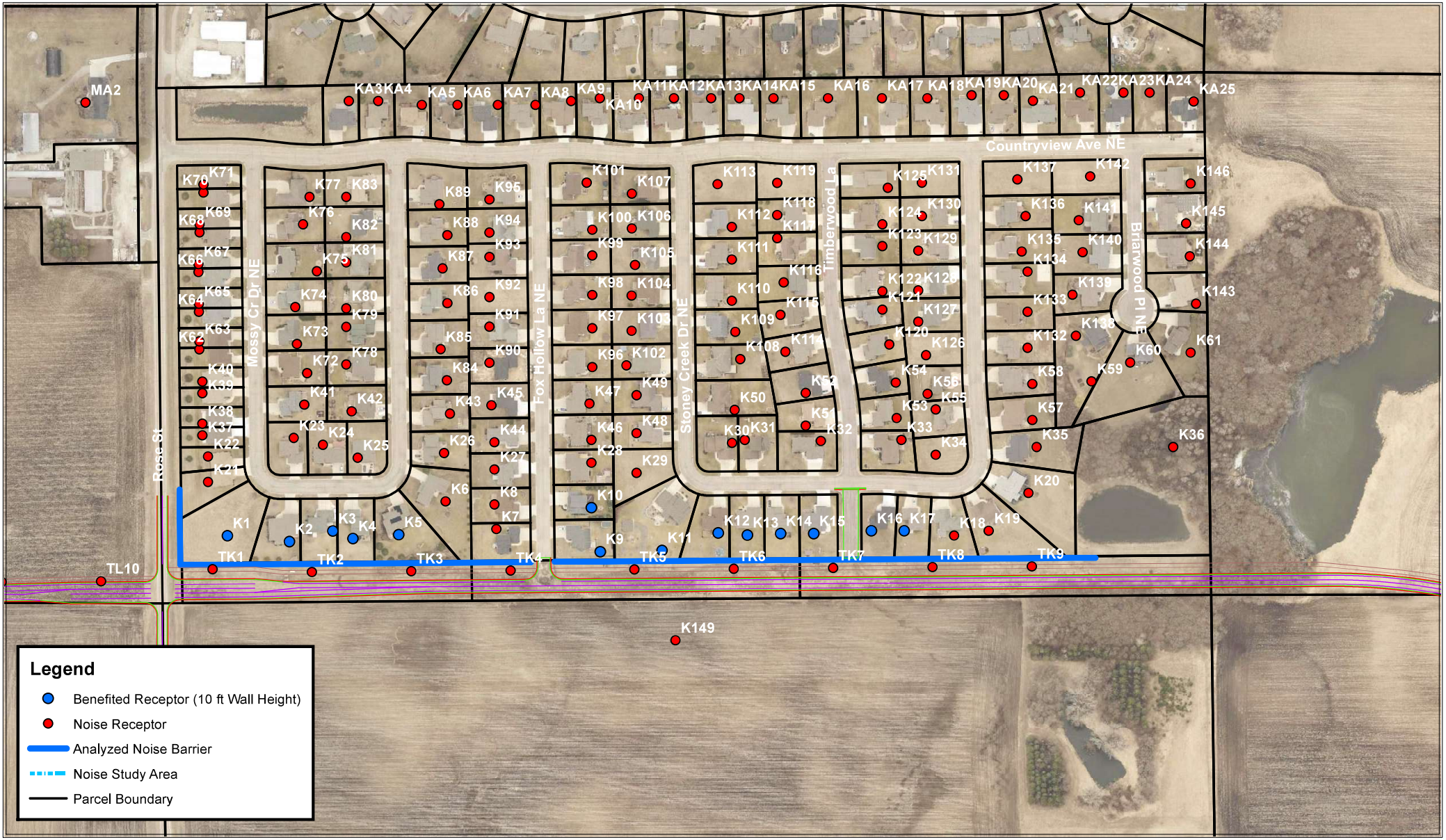
DRAFT



Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-6: Noise Receptors

Date: 12/8/2024



Steele Co. East Side Corridor - Noise Study Exhibit

Appendix A-X: Noise Receptors (Wall K1)

Date: 12/14/2024

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
I30	10	B	67	58.7	59.6	0.9	57.2	-2.4	-1.5	(1)
I31	1	B	67	58.5	59.4	0.9	57.2	-2.2	-1.3	
I32	1	G	-	56.9	57.8	0.9	58.4	-	-	
I33	1	G	-	56.6	57.4	0.8	57.8	-	-	
I34	1	G	-	56.4	57.2	0.8	57.3	-	-	
I35	1	B	67	55.4	56.2	0.8	56.3	0.1	0.9	
I36	1	B	67	49.3	50.2	0.9	50.7	0.5	1.4	
I37	1	B	67	45.1	45.9	0.8	46.1	0.2	1.0	
I38	1	B	67	43.8	44.6	0.8	44.4	-0.2	0.6	
I39	1	B	67	43.2	44.0	0.8	44.1	0.1	0.9	
I40	1	B	67	43.8	44.6	0.8	43.9	-0.7	0.1	
I41	3	B	67	41.0	41.8	0.8	41.1	-0.7	0.1	
I42	10	G	-	46.3	47.0	0.7	45.4	-	-	(1)
I43	3	B	67	41.9	42.7	0.8	42.1	-0.6	0.2	
I44	9	B	67	44.9	45.7	0.8	44.1	-1.6	-0.8	(1)
I45	1	B	67	42.3	43.1	0.8	42.6	-0.5	0.3	
I46	1	B	67	53.4	54.2	0.8	47.0	-7.2	-6.4	(1)
J1	1	B	67	53.6	54.3	0.7	57.1	2.8	3.5	
J2	1	G	-	36.9	37.7	0.8	53.0	-	-	
J3	1	G	-	35.1	35.9	0.8	58.5	-	-	
K1	1	B	67	56.5	57.5	1.0	60.0	2.5	3.5	
K2	1	B	67	45.2	46.3	1.1	57.9	11.6	12.7	
K3	1	B	67	40.7	42.1	1.4	52.3	10.2	11.6	
K4	1	B	67	43.0	44.1	1.1	54.6	10.5	11.6	
K5	1	B	67	40.0	41.3	1.3	54.8	13.5	14.8	
K6	1	B	67	37.0	39.5	2.5	50.4	10.9	13.4	
K7	1	B	67	40.4	43.7	3.3	52.1	8.4	11.7	
K8	1	B	67	39.1	42.2	3.1	49.6	7.4	10.5	
K9	1	B	67	38.0	41.1	3.1	60.6	19.5	22.6	
K10	1	B	67	37.2	41.5	4.3	52.3	10.8	15.1	
K11	1	B	67	36.2	38.8	2.6	60.4	21.6	24.2	
K12	1	B	67	33.3	34.8	1.5	58.6	23.8	25.3	
K13	1	B	67	32.9	34.3	1.4	58.8	24.5	25.9	
K14	1	B	67	32.4	33.7	1.3	58.7	25.0	26.3	
K15	1	B	67	31.8	33.1	1.3	58.8	25.7	27.0	
K16	1	B	67	36.3	40.3	4.0	58.5	18.2	22.2	
K17	1	B	67	34.9	38.4	3.5	57.8	19.4	22.9	
K18	1	B	67	31.1	32.3	1.2	54.9	22.6	23.8	
K19	1	B	67	34.3	37.6	3.3	55.0	17.4	20.7	
K20	1	B	67	28.3	29.5	1.2	52.2	22.7	23.9	
K21	1	B	67	59.9	60.9	1.0	62.0	1.1	2.1	
K22	1	B	67	59.1	60.1	1.0	61.1	1.0	2.0	
K23	1	B	67	42.8	45.8	3.0	44.4	-1.4	1.6	
K24	1	B	67	39.2	42.0	2.8	41.2	-0.8	2.0	
K25	1	B	67	42.2	46.2	4.0	44.9	-1.3	2.7	
K26	1	B	67	38.6	42.9	4.3	44.8	1.9	6.2	
K27	1	B	67	38.6	42.2	3.6	46.9	4.7	8.3	
K28	1	B	67	38.3	42.7	4.4	48.3	5.6	10.0	
K29	1	B	67	40.0	44.5	4.5	48.7	4.2	8.7	
K30	1	B	67	33.7	38.2	4.5	35.1	-3.1	1.4	
K31	1	B	67	37.7	42.3	4.6	39.9	-2.4	2.2	
K32	1	B	67	42.6	47.5	4.9	45.2	-2.3	2.6	
K33	1	B	67	39.7	44.9	5.2	45.3	0.4	5.6	
K34	1	B	67	43.0	48.1	5.1	47.5	-0.6	4.5	
K35	1	B	67	33.5	38.3	4.8	49.6	11.3	16.1	
K36	1	B	67	30.9	33.4	2.5	49.1	15.7	18.2	
K37	1	B	67	60.4	61.4	1.0	62.4	1.0	2.0	
K38	1	B	67	60.3	61.3	1.0	62.3	1.0	2.0	
K39	1	B	67	60.1	61.2	1.1	62.1	0.9	2.0	
K40	1	B	67	60.8	61.8	1.0	62.8	1.0	2.0	
K41	1	B	67	41.6	44.1	2.5	43.9	-0.2	2.3	
K42	1	B	67	41.2	44.2	3.0	43.4	-0.8	2.2	
K43	1	B	67	38.3	42.5	4.2	43.7	1.2	5.4	
K44	1	B	67	39.5	43.2	3.7	46.5	3.3	7.0	
K45	1	B	67	38.3	42.1	3.8	44.5	2.4	6.2	
K46	1	B	67	38.2	42.5	4.3	46.9	4.4	8.7	

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
K47	1	B	67	38.3	42.6	4.3	45.6	3.0	7.3	
K48	1	B	67	38.0	42.3	4.3	45.3	3.0	7.3	
K49	1	B	67	37.9	42.1	4.2	43.7	1.6	5.8	
K50	1	B	67	38.0	42.6	4.6	40.4	-2.2	2.4	
K51	1	B	67	39.0	43.9	4.9	41.6	-2.3	2.6	
K52	1	B	67	37.9	42.6	4.7	40.7	-1.9	2.8	
K53	1	B	67	37.1	42.5	5.4	44.4	1.9	7.3	
K54	1	B	67	34.8	40.3	5.5	41.2	0.9	6.4	
K55	1	B	67	35.8	40.8	5.0	39.9	-0.9	4.1	
K56	1	B	67	35.7	40.5	4.8	41.0	0.5	5.3	
K57	1	B	67	34.7	39.4	4.7	48.0	8.6	13.3	
K58	1	B	67	35.2	39.7	4.5	45.9	6.2	10.7	
K59	1	B	67	32.1	35.6	3.5	46.4	10.8	14.3	
K60	1	B	67	31.7	34.8	3.1	46.5	11.7	14.8	
K61	1	B	67	31.8	33.7	1.9	45.9	12.2	14.1	
K62	1	B	67	61.2	62.2	1.0	63.2	1.0	2.0	
K63	1	B	67	61.2	62.2	1.0	63.2	1.0	2.0	
K64	1	B	67	61.2	62.2	1.0	63.1	0.9	1.9	
K65	1	B	67	61.1	62.1	1.0	63.1	1.0	2.0	
K66	1	B	67	61.0	62.0	1.0	63.0	1.0	2.0	
K67	1	B	67	61.0	62.0	1.0	63.0	1.0	2.0	
K68	1	B	67	59.5	60.5	1.0	61.4	0.9	1.9	
K69	1	B	67	60.0	61.0	1.0	62.0	1.0	2.0	
K70	1	B	67	57.7	58.7	1.0	59.5	0.8	1.8	
K71	1	B	67	58.6	59.6	1.0	60.3	0.7	1.7	
K72	1	B	67	41.0	43.5	2.5	43.3	-0.2	2.3	
K73	1	B	67	40.9	43.6	2.7	43.0	-0.6	2.1	
K74	1	B	67	41.5	44.0	2.5	43.1	-0.9	1.6	
K75	1	B	67	42.9	44.8	1.9	44.1	-0.7	1.2	
K76	1	B	67	46.3	47.8	1.5	46.0	-1.8	-0.3	(2)
K77	1	B	67	50.2	51.4	1.2	49.1	-2.3	-1.1	(2)
K78	1	B	67	41.2	43.8	2.6	43.2	-0.6	2.0	
K79	1	B	67	42.0	44.4	2.4	43.9	-0.5	1.9	
K80	1	B	67	42.4	44.7	2.3	44.1	-0.6	1.7	
K81	1	B	67	44.0	45.9	1.9	45.0	-0.9	1.0	
K82	1	B	67	45.4	47.1	1.7	45.8	-1.3	0.4	
K83	1	B	67	50.4	51.6	1.2	49.4	-2.2	-1.0	(2)
K84	1	B	67	38.3	42.4	4.1	42.5	0.1	4.2	
K85	1	B	67	39.4	43.3	3.9	42.8	-0.5	3.4	
K86	1	B	67	40.0	43.4	3.4	42.8	-0.6	2.8	
K87	1	B	67	41.3	44.2	2.9	43.0	-1.2	1.7	
K88	1	B	67	43.8	45.8	2.0	44.1	-1.7	0.3	
K89	1	B	67	47.7	49.1	1.4	46.5	-2.6	-1.2	(2)
K90	1	B	67	38.4	42.0	3.6	43.7	1.7	5.3	
K91	1	B	67	40.2	43.6	3.4	44.7	1.1	4.5	
K92	1	B	67	41.9	45.5	3.6	46.7	1.2	4.8	
K93	1	B	67	42.3	44.7	2.4	45.0	0.3	2.7	
K94	1	B	67	44.3	46.1	1.8	45.4	-0.7	1.1	
K95	1	B	67	48.9	50.1	1.2	47.9	-2.2	-1.0	(2)
K96	1	B	67	38.2	42.3	4.1	44.9	2.6	6.7	
K97	1	B	67	38.7	42.5	3.8	44.4	1.9	5.7	
K98	1	B	67	39.4	42.8	3.4	44.1	1.3	4.7	
K99	1	B	67	41.0	43.7	2.7	44.3	0.6	3.3	
K100	1	B	67	43.5	45.3	1.8	45.5	0.2	2.0	
K101	1	B	67	50.4	51.3	0.9	50.7	-0.6	0.3	
K102	1	B	67	37.7	41.6	3.9	43.3	1.7	5.6	
K103	1	B	67	38.6	42.3	3.7	43.0	0.7	4.4	
K104	1	B	67	39.1	42.5	3.4	42.7	0.2	3.6	
K105	1	B	67	40.7	43.7	3.0	43.2	-0.5	2.5	
K106	1	B	67	43.6	45.4	1.8	44.8	-0.6	1.2	
K107	1	B	67	48.7	49.7	1.0	49.0	-0.7	0.3	
K108	1	B	67	37.0	41.1	4.1	40.0	-1.1	3.0	
K109	1	B	67	37.4	41.6	4.2	40.0	-1.6	2.6	
K110	1	B	67	37.9	41.9	4.0	39.7	-2.2	1.8	
K111	1	B	67	39.3	42.6	3.3	40.6	-2.0	1.3	
K112	1	B	67	42.3	44.5	2.2	42.9	-1.6	0.6	

Appedendix B: Table B1
Steele Co - Owatanna
Noise Analysis Summary Table
Existing and Future Scenarios

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria
XX	Substantial Noise Increase (Increase of 5dBA or more)

Receptor		FHWA Noise Abatement Criteria		2023 Existing Conditions	2044 No Build Conditions	Difference - Existing and No Build	2044 Build Conditions	Difference - Build and No-Build	Difference - Existing and Build	Notes
ID	Number of Units	Criteria	Leq	Leq	Leq	Leq	Leq	Leq	Leq	
K113	1	B	67	49.1	50.7	1.6	49.3	-1.4	0.2	
K114	1	B	67	36.9	41.4	4.5	39.8	-1.6	2.9	
K115	1	B	67	37.7	41.8	4.1	40.1	-1.7	2.4	
K116	1	B	67	38.8	42.5	3.7	40.6	-1.9	1.8	
K117	1	B	67	41.2	43.8	2.6	42.4	-1.4	1.2	
K118	1	B	67	44.4	46.2	1.8	44.8	-1.4	0.4	
K119	1	B	67	48.7	50.2	1.5	48.8	-1.4	0.1	
K120	1	B	67	37.5	42.3	4.8	41.1	-1.2	3.6	
K121	1	B	67	37.8	42.3	4.5	41.4	-0.9	3.6	
K122	1	B	67	38.2	42.5	4.3	41.5	-1.0	3.3	
K123	1	B	67	39.4	42.8	3.4	41.5	-1.3	2.1	
K124	1	B	67	41.2	43.7	2.5	42.5	-1.2	1.3	
K125	1	B	67	46.0	47.3	1.3	46.4	-0.9	0.4	
K126	1	B	67	38.9	43.9	5.0	41.6	-2.3	2.7	
K127	1	B	67	37.4	42.2	4.8	41.9	-0.3	4.5	
K128	1	B	67	37.3	41.6	4.3	40.4	-1.2	3.1	
K129	1	B	67	39.0	42.4	3.4	41.1	-1.3	2.1	
K130	1	B	67	42.4	44.6	2.2	43.3	-1.3	0.9	
K131	1	B	67	47.2	48.6	1.4	47.5	-1.1	0.3	
K132	1	B	67	35.6	40.1	4.5	44.3	4.2	8.7	
K133	1	B	67	35.5	40.0	4.5	43.1	3.1	7.6	
K134	1	B	67	34.8	39.2	4.4	41.4	2.2	6.6	
K135	1	B	67	37.1	41.0	3.9	41.8	0.8	4.7	
K136	1	B	67	38.9	41.7	2.8	41.9	0.2	3.0	
K137	1	B	67	44.2	46.6	2.4	45.2	-1.4	1.0	
K138	1	B	67	32.7	36.4	3.7	44.2	7.8	11.5	
K139	1	B	67	33.5	37.0	3.5	42.0	5.0	8.5	
K140	1	B	67	36.1	38.4	2.3	41.2	2.8	5.1	
K141	1	B	67	38.2	40.0	1.8	41.5	1.5	3.3	
K142	1	B	67	42.5	43.8	1.3	43.8	0.0	1.3	
K143	1	B	67	31.7	33.0	1.3	43.0	10.0	11.3	
K144	1	B	67	32.7	33.7	1.0	40.3	6.6	7.6	
K145	1	B	67	33.3	34.3	1.0	39.7	5.4	6.4	
K146	1	B	67	33.6	34.6	1.0	39.3	4.7	5.7	
K147	1	G	-	30.8	32.0	1.2	49.3	-	-	
K148	1	G	-	55.4	56.2	0.8	55.3	-	-	
K149	1	G	-	35.5	37.2	1.7	58.0	-	-	
K150	1	B	67	54.1	54.9	0.8	57.3	2.4	3.2	
L1	1	G	-	36.6	36.7	0.1	57.7	-	-	
L2	1	G	-	43.0	43.0	0.0	58.9	-	-	
L3	1	G	-	36.6	36.8	0.2	59.2	-	-	
L4	1	G	-	42.6	42.6	0.0	58.7	-	-	
M1	1	B	67	42.2	42.2	0.0	43.9	1.7	1.7	
M2	1	G	-	55.7	55.7	0.0	54.4	-	-	
M3	1	B	67	39.9	40.0	0.1	50.1	10.1	10.2	
M4	1	G	-	45.4	45.5	0.1	62.0	-	-	
M5	1	G	-	38.2	38.3	0.1	59.6	-	-	
N1	1	G	-	48.3	48.4	0.1	53.1	-	-	
N2	1	G	-	48.0	48.0	0.0	49.3	-	-	
N3	1	G	-	52.3	52.3	0.0	58.6	-	-	
N4	1	G	-	52.8	52.8	0.0	54.4	-	-	
O1	1	B	67	47.3	48.2	0.9	53.3	5.1	6.0	
O2	1	G	-	39.0	39.6	0.6	53.8	-	-	
O3	1	G	-	39.1	39.6	0.5	54.4	-	-	
P1	1	G	-	57.2	58.1	0.9	59.1	-	-	
P2	1	G	-	57.7	58.7	1.0	60.1	-	-	
Q1	1	G	-	64.1	65.1	1.0	64.8	-	-	
Q2	1	B	67	49.0	50.0	1.0	50.1	0.1	1.1	
Q3	1	G	-	61.2	62.2	1.0	63.2	-	-	
Q4	1	G	-	60.4	61.4	1.0	58.9	-	-	
Q5	1	B	67	59.9	60.8	0.9	58.3	-2.5	-1.6	(4)
R1	1	C	67	52.0	53.0	1.0	52.8	-0.2	0.8	
R2	1	B	67	53.5	54.5	1.0	54.5	0.0	1.0	
R3	1	B	67	49.3	50.3	1.0	50.2	-0.1	0.9	
R4	1	B	67	49.0	50.0	1.0	49.9	-0.1	0.9	
R5	1	B	67	50.2	51.2	1.0	51.2	0.0	1.0	

Noise Level Comparison	
XX	Approaches or Exceeds FHWA Noise Abatement Criteria

Table B-2: Wall K1 Summary

Noise Barrier	Receptor	Activity Category	Number of Units	Leq Noise Level (dBA)			Noise Reduction (dBA)	Benefited Receptors	Total Benefited Receptors	Acoustically Effective	Design Goal Reduction (>7 dBA)	Height of Barrier (ft)	Length of Barrier (ft)	Barrier Area (sq ft)	Total Cost of Barrier ($36/sq ft)	Cost Per Benefited Receptor	Noise Barrier Results
				FHWA Noise Criteria	Build Year 2040 No Noise Barrier	Build Year 2040 With Noise Barrier											
20ft height																	
Wall K1	K1	B	1	67	60.0	50.7	9.3	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K2	B	1	67	57.9	44.3	13.6	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K3	B	1	67	52.3	42.6	9.7	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K4	B	1	67	54.6	44.9	9.7	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K5	B	1	67	54.8	44.3	10.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K6	B	1	67	50.4	41.9	8.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K7	B	1	67	52.1	45.6	6.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K8	B	1	67	49.6	44.1	5.5	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K9	B	1	67	60.6	46.9	13.7	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K10	B	1	67	52.3	43.9	8.4	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K11	B	1	67	60.4	45.0	15.4	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K12	B	1	67	58.6	44.5	14.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K13	B	1	67	58.8	44.6	14.2	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K14	B	1	67	58.7	44.7	14	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K15	B	1	67	58.8	44.7	14.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K16	B	1	67	58.5	45.2	13.3	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K17	B	1	67	57.8	45.6	12.2	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K18	B	1	67	54.9	45.8	9.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K19	B	1	67	55.0	46.9	8.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K20	B	1	67	52.2	47.0	5.2	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K21	B	1	67	62.0	58.6	3.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K22	B	1	67	61.1	59.7	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K23	B	1	67	44.4	43.6	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K24	B	1	67	41.2	40.6	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K25	B	1	67	44.9	42.0	2.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K26	B	1	67	44.8	41.2	3.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K27	B	1	67	46.9	43.6	3.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K28	B	1	67	48.3	43.8	4.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K29	B	1	67	48.7	42.8	5.9	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K30	B	1	67	35.1	34.5	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K31	B	1	67	39.9	38.5	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K32	B	1	67	45.2	43.3	1.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K33	B	1	67	45.3	41.2	4.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K34	B	1	67	47.5	43.7	3.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K35	B	1	67	49.6	44.5	5.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K36	B	1	67	49.1	45.4	3.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K37	B	1	67	62.4	61.6	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K38	B	1	67	62.3	61.6	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K39	B	1	67	62.1	61.8	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K40	B	1	67	62.8	62.5	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K41	B	1	67	43.9	42.0	1.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K42	B	1	67	43.4	42.7	0.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K43	B	1	67	43.7	41.7	2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K44	B	1	67	46.5	44.0	2.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K45	B	1	67	44.5	42.9	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K46	B	1	67	46.9	43.4	3.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K47	B	1	67	45.6	43.4	2.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K48	B	1	67	45.3	41.5	3.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K49	B	1	67	43.7	41.0	2.7	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K50	B	1	67	40.4	39.2	1.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K51	B	1	67	41.6	40.1	1.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K52	B	1	67	40.7	39.1	1.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K53	B	1	67	44.4	40.4	4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K54	B	1	67	41.2	36.8	4.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K55	B	1	67	39.9	36.9	3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K56	B	1	67	41.0	38.0	3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K57	B	1	67	48.0	42.9	5.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K58	B	1	67	45.9	41.3	4.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K59	B	1	67	46.4	41.5	4.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K60	B	1	67	46.5	41.4	5.1	1	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K61	B	1	67	45.9	41.4	4.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K62	B	1	67	63.2	62.1	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K63	B	1	67	63.2	62.1	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K64	B	1	67	63.1	62.1	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K65	B	1	67	63.1	62.1	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K66	B	1	67	63.0	62.1	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K67	B	1	67	63.0	62.1	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K68	B	1	67	61.4	61.4	0	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K69	B	1	67	62.0	61.6	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K70	B	1	67	59.5	59.4	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K71	B	1	67	60.3	60.4	-0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K72	B	1	67	43.3	42.0	1.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K73	B	1	67	43.0	41.9	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K74	B	1	67	43.1	42.2	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K75	B	1	67	44.1	43.3	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K76	B	1	67	46.0	45.7	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K77	B	1	67	49.1	49.0	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K78	B	1	67	43.2	42.4	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K79	B	1	67	43.9	43.0	0.9	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K80	B	1	67	44.1	43.3	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K81	B	1	67	45.0	44.5	0.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K82	B	1	67	45.8	45.5	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K83	B	1	67	49.4	49.3	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K84	B	1	67	42.5	41.1	1.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K85	B	1	67	42.8	41.7	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K86	B	1	67	42.8	42.0	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K87	B	1	67	43.0	42.4	0.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K88	B	1	67	44.1	43.7	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K89	B	1	67	46.5	46.3	0.2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K90	B	1	67	43.7	42.7	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K91	B	1	67	44.7	44.2	0.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K92	B	1	67	46.7	46.4	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K93	B	1	67	45.0	44.6	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K94	B	1	67	45.4	45.1	0.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K95	B	1	67	47.9	47.8	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K96	B	1	67	44.9	42.8	2.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K97	B	1	67	44.4	42.9	1.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K98	B	1	67	44.1	43.1	1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K99	B	1	67	44.3	43.8	0.5	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K100	B	1	67	45.5	45.1	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K101	B	1	67	50.7	50.6	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K102	B	1	67	43.3	40.7	2.6	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K103	B	1	67	43.0	41.0	2	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K104	B	1	67	42.7	41.4	1.3	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K105	B	1	67	43.2	42.4	0.8	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K106	B	1	67	44.8	44.4	0.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K107	B	1	67	49.0	48.9	0.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K108	B	1	67	40.0	37.6	2.4	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct
Wall K1	K109	B	1	67	40.0	37.9	2.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct

													Noise Level Comparison				
													XX	Approaches or Exceeds FHWA Noise Abatement Criteria			
Wall K1	K110	B	1	67	39.7	38.6	1.1	0	24	Yes	Yes	20	2430	48600	$ 1,749,600	$ 72,900	Propose to Construct

Comment #86

Date: December 27, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Finding: The Claimed "Preserved Corridor" Is Contradicted by an Affirmative Governmental Determination That the Project Was Not Foreseeable

The Environmental Assessment Worksheet (EAW) repeatedly relies on the assertion that the East Side Corridor has been "preserved for decades" to justify alignment selection, proximity to existing homes, and dismissal of avoidance alternatives. That claim is directly contradicted by the City's own prior governmental action. As reflected in the public record on August 5, 2013, a formal motion was made and adopted to remove the relevant roadway segments from the Municipal State Aid (MSA) system because the City did not foresee the project ever being constructed. Resolution 73-13 was recorded. Removal from MSA is not clerical or incidental; it is an affirmative determination that a roadway is not planned, not foreseeable, and not part of the functional transportation system. A corridor cannot simultaneously be "preserved" and "not expected to ever happen." The EAW's reliance on the existence of a preserved corridor therefore rests on a false and unsupported environmental baseline that ignores prior abandonment of the project by the partner to the responsible governmental unit.

Watch resolution 72-13 approval here: https://youtu.be/Ic_GGLH7TUs

Implications for Environmental Review

This contradiction between the claimed "preserved corridor" and the City's prior determination that the project was not foreseeable has multiple material implications for the adequacy of the environmental review:

1. **Predetermination.** The City affirmatively abandoned the corridor, then later revived only a single alignment while asserting inevitability and stating that it could "legally build there," demonstrating that alignment selection preceded and constrained environmental review rather than resulting from it.
2. **Incomplete and Misleading EAW.** An Environmental Assessment Worksheet cannot lawfully rely on a corridor as "preserved" when the administrative record contains a formal governmental decision that the project was not expected to ever occur. This omission distorts the environmental baseline and materially misleads the public and decision-makers.
3. **Improper Dismissal of Alternatives.** Avoidance and alternative corridors were rejected based on the false premise that the selected alignment was preordained, foreclosing meaningful comparative analysis required under MEPA.
4. **Bad Faith Planning.** The sequence of governmental actions—abandoning the project for decades, allowing homes to be built in reliance on that abandonment, removing the

corridor from the Municipal State Aid system, and later resurrecting the same corridor as justification for imposing impacts on established neighborhoods—reflects inconsistent and unreliable planning practices incompatible with the integrity of environmental review.

This defect is structural, materially misleading, and cannot be cured through post-hoc explanation or website corrections, rendering the EAW inadequate to support a Finding of No Significant Impact.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #87

Failure to Incorporate Federal Undertaking Requirements
EAW Comment #22

Date: December 26, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Failure to Incorporate Federal Undertaking Requirements Renders the EAW Incomplete and Misleading

I had previously requested project updates and notifications but did not receive notice of the Environmental Assessment Worksheet (EAW) until approximately two weeks after the public comment period had already opened, nor did I receive the EAW itself. At the same time, I was being denied access to public data necessary to understand and comment on the project and was a named party in an ongoing public data practices case involving the County.

Approximately one week after the EAW comment period opened, an administrative ruling was issued finding that we had substantially prevailed in that case, that the County had unlawfully prevented access to public data, and that maximum statutory penalties were imposed. Despite this ruling, access to project-related data has continued to be denied during the EAW comment period. In addition, more than 1,800 records went missing while in the County's possession, and the County has refused to provide the software necessary to view data that we were previously able to inspect.

Cumulatively, these failures—including delayed notice, failure to provide the EAW, continued denial of access to public data, and loss or inaccessibility of records—prevented meaningful participation in the environmental review process and reflect the broader notice and access failures described in the group comment.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly impacted resident

Comment #88

Procedural Irregularities, Engineer Oversight Gaps, and Professional Responsibility Concerns

EAW Comment #9

Date: December 22, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Procedural Restart History Demonstrates Predetermination and Inadequate Environmental Review

This comment is submitted to document the repeated procedural restarts of the East Side Corridor project and to demonstrate that, despite multiple resets, the current Environmental Assessment Worksheet (EAW) remains incomplete, biased, and procedurally inadequate. The history of this project shows a pattern of predetermined decision-making followed by retroactive attempts to fit environmental documentation around a chosen outcome.

1. Initial EAW and Unacknowledged Substantial Changes

Early environmental review was conducted under a Hybrid EAW framework while the project alignment and scope materially changed. Residents raised concerns about substantial modifications that significantly increased residential impacts, including expansion of the affected area to the established North Country Subdivision, encompassing approximately 160 additional homes. Some of these homes are located within or immediately adjacent to the historically mapped right-of-way. Similar concerns apply to the Shady Hill Subdivision, which was platted across the mapped right-of-way without prior environmental analysis of roadway impacts.

The County later asserted that the EAW had to be restarted because the project no longer connected to Highway 14 and therefore constituted a substantial change. However, through public data requests, it became clear that the prior EAW had never actually been properly filed with the State. The restart was therefore not merely discretionary, but necessary due to a fundamental procedural failure.

2. Shift to a Programmatic Categorical Exclusion (PCE)

After residents raised concerns with state agencies that the project's scope had materially changed to include existing residential neighborhoods not previously analyzed — a substantial change under MEPA requiring renewed environmental review — the project transitioned from the EAW process to a Programmatic Categorical Exclusion (PCE). Project representatives indicated that this shift would involve additional federal oversight. However, during the PCE phase, alternatives were further narrowed and the level of publicly available information regarding impacts, mitigation measures, and comparative analysis was reduced.

3. "Preferred Alternative" Without Supporting Analysis and Narrative Reframing

In 2023, a "preferred alternative" was released without supporting technical documentation and in direct contradiction to multiple historical studies that had evaluated east-side beltline alignments. When residents cited those counties provided historical, the project narrative shifted again: the County and the City asserted that the historical documents were no longer relevant because they addressed a "beltline," while the current project was now characterized as a "new road with a new purpose."

This reframing did not resolve the underlying issue. A "new road with a new purpose" requires new studies including a ne purpose and need documentation and a full, good-faith evaluation of alternatives.

When residents raised this issue with state and federal agencies, it was acknowledged behind the scenes that the existing documentation was inadequate.

As a result, the project was required to restart again in fall 2023 under a Non-Programmatic Categorical Exclusion (NPCE), as directed by the Federal Highway Administration in coordination with MnDOT District 6. In March 2024, County staff informed residents that this federal involvement had been triggered by communications with FHWA. Public data later confirmed that these communications consisted of written requests for clarification and that the restart requirement originated from FHWA/MnDOT District 6, which met directly with County staff to convey that determination.

4. Repeated Restarts Without Corrective Substantive Analysis

Despite at least three procedural resets, the current EAW still fails to meaningfully analyze or disclose:

- noise, vibration, light, and air quality impacts to nearby residents;
- safety, environmental justice, social, and cultural impacts;
- agricultural impacts beyond acreage conversion, including drainage, tiling, productivity, and long-term tax implications;
- floodplain and stormwater risks;
- cumulative impacts resulting from scope expansion;
- cost escalation, public financial exposure, and tax liabilities; and
- a full, unbiased evaluation of reasonable alternatives.

Alternatives have continued to be prematurely eliminated despite repeated acknowledgments that prior analyses were insufficient or procedurally invalid.

Conclusion

The repeated restarting of environmental review — without correcting the same substantive deficiencies — demonstrates a pattern of outcome-driven decision-making rather than compliance with MEPA's requirement for informed, transparent, and participatory environmental review. An Environmental Impact Statement (EIS) now represents the fourth opportunity to reset this process. Given the history of incomplete analysis, withheld or insufficiently disclosed impacts, and prematurely narrowed alternatives, an independent EIS is warranted and necessary to fully evaluate the environmental, human, agricultural, and fiscal impacts associated with this project.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #89

Date: December 26, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Failure to Incorporate Federal Undertaking Requirements Renders the EAW Incomplete and Misleading

The Environmental Assessment Worksheet (EAW) for the East Side Corridor is fundamentally incomplete because it fails to incorporate the analyses, studies, and disclosures required once the project was formally determined to be a **federal undertaking**. Although the administrative record contains MnDOT Cultural Resources Unit (CRU) correspondence declaring the project a federal undertaking on behalf of the Federal Highway Administration (FHWA), the EAW does not reflect the substantive consequences of that determination.

A federal undertaking is not merely a label; it carries mandatory analytical obligations. None of those obligations are meaningfully addressed in the EAW.

Federal Undertaking Determination Triggered Federal Compliance Obligations

On **April 1, 2025**, MnDOT's Cultural Resources Unit, acting on behalf of FHWA, determined that the East Side Corridor constitutes a **federal undertaking**. That determination was reaffirmed on **July 3 and July 29, 2025**. These determinations are included in the EAW attachments.

However, the EAW treats the federal undertaking as a background administrative clearance rather than as a condition that governs the scope, content, and rigor of environmental review. The EAW does not explain how federal involvement alters applicable standards, required studies, or impact thresholds.

Required Federal Analyses Are Missing from the EAW

Once a project is a federal undertaking, federal environmental compliance requirements apply regardless of later funding decisions. The EAW fails to include or integrate the following required federal analyses:

1. FHWA Traffic Noise Analysis

- No FHWA-compliant traffic noise analysis is included.
- No identification of noise receptors under federal criteria.
- No determination of traffic noise impacts using federal thresholds.

- No evaluation of feasible and reasonable noise abatement under **23 CFR Part 772**.

Instead, the EAW minimizes noise impacts by relying on the absence of federal funding, even though federal undertaking status had already been established. Noise mitigation options presented are therefore **non-compliant with federal standards** and cannot lawfully substitute for an FHWA noise analysis.

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2. Section 106 Effects Analysis Integrated into the EAW

While correspondence from MnDOT's Cultural Resources Unit (CRU) regarding Section 106 review is included in the EAW attachments, the EAW itself does not meaningfully integrate federal historic review into its environmental analysis. Specifically, the EAW:

- References historic properties in a summary manner but does **not present a complete Area of Potential Effects (APE) analysis within the EAW narrative**, nor does it include APE mapping sufficient for public review;
- Does **not analyze indirect, cumulative, or visual effects** to historic properties associated with the federal undertaking;
- Does **not explain how alternatives, alignment selection, or design decisions affect historic resources**, despite those decisions being central to the project;
- Does **not incorporate Section 106 findings into the MEPA impact analysis**, treating them instead as a separate administrative process.

As a result, federal historic review is presented as an external clearance rather than as an environmental impact subject to disclosure, evaluation, and public comment under MEPA.

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3. Federal Farmland Protection Analysis

The EAW does not include analysis required under the **Farmland Protection Policy Act (FPPA)**, despite the project constituting a federal undertaking and converting agricultural land. Specifically, the EAW does not include:

- Identification or evaluation of **prime, unique, or statewide-important farmland under federal FPPA criteria**, beyond generalized acreage totals;
- Analysis of **direct, indirect, or cumulative farmland conversion impacts** associated with the project;
- Documentation of **coordination with USDA Natural Resources Conservation Service (NRCS)** or completion of **Form AD-1006**; or
- Disclosure of **federal farmland conversion impacts** required for a project subject to federal environmental compliance.

Instead, farmland impacts are presented solely as acreage figures, which do not satisfy FPPA requirements and materially understate the extent of federal farmland impacts. The absence of FPPA analysis further reflects improper minimization of federal obligations.

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4. U.S. Army Corps of Engineers Review and Water Impacts

The EAW does not include analysis required for federal review of impacts to waters and floodplains, despite the project constituting a federal undertaking. Specifically, the EAW does not:

- Identify or delineate **waters of the United States** subject to federal jurisdiction;
- Analyze **floodplain impacts under applicable federal standards**, including effects associated with roadway fill, bridges, and grade-separated structures;
- Disclose whether **Clean Water Act Section 404 permitting** is required for placement of fill in waters or wetlands; or
- Document **coordination with the U.S. Army Corps of Engineers** regarding federal water resource impacts.

Instead, floodplains and waterways are discussed only in generalized terms, without the federal permitting context or impact analysis required for a project subject to federal environmental compliance. As a result, the EAW understates the scope and significance of water and floodplain impacts and does not provide the public with sufficient information to evaluate federal regulatory consequences.

Failure to Analyze Railroad Crossing and Grade-Separated Structure

As part of the federal undertaking, the project includes a railroad crossing requiring a large grade-separated structure. Aside from references contained in MnDOT Cultural Resources Unit correspondence included in the attachments, the EAW does not disclose or analyze this structure as a project impact.

The EAW does not describe the railroad crossing or associated elevated structure in the project description, nor does it evaluate its visual, noise, vibration, land use, safety, or cumulative impacts. A grade-separated railroad crossing is a major infrastructure component with independent environmental consequences and federal coordination requirements. Its omission from the EAW's analytical sections further demonstrates that federally significant project elements were minimized or excluded from environmental review.

Improper Minimization of Impacts Through Funding Recharacterization

Rather than incorporating required federal analyses, the EAW minimizes impacts by implicitly treating the project as locally funded and therefore subject to reduced standards. This approach is legally flawed.

Federal undertaking status does not disappear because funding sources change. The EAW's failure to analyze impacts under federal standards results in:

- Understated noise impacts;
- Non-compliant mitigation options;
- Incomplete evaluation of farmland loss; and
- Insufficient analysis of floodplain and waterway effects.

As a result, the EAW presents an artificially constrained and misleading environmental baseline.

Incomplete Federal Environmental Record Following Non-Programmatic Categorical Exclusion

As of **March 26, 2025**, the project was being advanced under a **Non-Programmatic Categorical Exclusion (NPCE)** and represented as sufficiently complete that a vote on noise mitigation was contemplated, with an Environmental Assessment Worksheet (EAW) to follow. A Non-Programmatic CE is a federal NEPA determination and is supported by federal documentation addressing the scope of the federal action and applicable environmental compliance requirements.

On **April 1, 2025**, MnDOT's Cultural Resources Unit, acting on behalf of the Federal Highway Administration (FHWA), formally determined that the project constitutes a **federal undertaking**, a determination that was subsequently reaffirmed. Once federal undertaking status is established, federal environmental compliance obligations apply regardless of funding source.

However, the EAW does not include — nor does the administrative record disclose — the federal environmental documentation that would be expected for a project that has progressed under an NPCE and has been confirmed as a federal undertaking. Specifically, the record lacks federally required analyses addressing noise, farmland conversion, historic effects, water and floodplain impacts, railroad coordination, and other federal review elements necessary for meaningful public evaluation of federal impacts.

As a result, the public is presented with an EAW that minimizes or omits federal impacts by treating them as external or administrative matters, rather than as substantive environmental considerations. Without inclusion of the federal analyses underlying the NPCE and the federal

undertaking determination, the environmental review is incomplete and does not allow for informed public participation or lawful decision-making.

Why This Defect Is Fatal

MEPA requires that an EAW accurately describe the project and disclose the full scope of environmental impacts before decisions are made. Where a project is a federal undertaking, omission of federally required analyses renders the EAW incomplete and misleading as a matter of law.

Because the EAW omits required federal noise, farmland, historic, and water resource analyses, it cannot support a Finding of No Significant Impact. These omissions cannot be cured through attachments, post-hoc explanations, or future studies conducted after project commitment.

Requested Action

For these reasons, the Responsible Governmental Unit must either:

1. Prepare a legally adequate environmental review that fully incorporates federal undertaking requirements, or
2. Require preparation of an Environmental Impact Statement (EIS) that evaluates the project under the correct federal and state standards.

Absent such action, continued reliance on the current EAW would perpetuate a materially incomplete and misleading environmental review.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly impacted resident

Comment #92

Improper Land-Use Assumptions Based on Annexation Map
EAW Comment #12

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Improper Land-Use Assumptions Based on Annexation Map

This comment addresses a discrete technical deficiency in the traffic analysis supporting the East Side Corridor Environmental Assessment Worksheet.

The memorandum states that *"development traffic was estimated using the map included in the 2024 Owatonna Township Orderly Annexation agreement."* Orderly annexation agreements are jurisdictional planning documents; they do not approve development, establish land-use intensity, or define build-out timelines.

Using an annexation map to estimate development traffic improperly substitutes a political planning document for adopted land-use approvals. The EAW fails to disclose zoning, density assumptions, phasing, or approved development programs for the parcels referenced. Treating speculative annexation areas as settled development embeds unsupported assumptions into the traffic analysis and biases the environmental review.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #93

Internally Inconsistent and Unexplained Traffic Projections
EAW Comment #15

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Internally Inconsistent and Unexplained Traffic Projections

This comment addresses a discrete technical deficiency in the traffic analysis supporting the East Side Corridor Environmental Assessment Worksheet.

Table 1 in the traffic forecast memorandum presents similar AADT values across multiple corridor segments, with abrupt increases that are not explained by specific development inputs or traffic assignment methodology. The EAW does not disclose how development traffic was distributed across individual segments or how assumed growth translates into the reported volumes.

Because the stated assumptions cannot be used to reproduce the reported AADT values, the traffic projections appear smoothed or assumed rather than analytically derived. This internal inconsistency undermines the credibility of the traffic analysis and prevents meaningful public review.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #94

Factually Incorrect Claim Regarding CSAH 43
ESC EAW Comment #**19**

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Factually Incorrect Claim Regarding CSAH 43 Connection to US 14 Raises Serious Reliability Concerns

The project website states that CSAH 43 is "still planned to ultimately connect directly to US 14." This statement is factually incorrect. CSAH 43 already connects directly to US 14 and has done so for decades as existing infrastructure.

This is not a nuanced disagreement—it is a basic description of the current roadway network. Inclusion of such a plainly inaccurate statement raises serious concerns regarding whether website content was subject to any meaningful engineering review prior to publication and whether technical authority was exercised at all. When public-facing materials contain errors of this magnitude, it undermines public trust and calls into question the reliability of other project claims presented as fact.

The Responsible Governmental Unit is responsible for the accuracy of all project information. The publication of inaccurate and misleading project information—particularly during an active environmental review and a period of staffing transition—demonstrates a breakdown in procedural integrity that cannot be cured by post-hoc corrections alone. Accordingly, the RGU must disclose who authored the website content, what technical or engineering review occurred prior to publication, and acknowledge that these defects materially undermine the Environmental Assessment Worksheet and preclude reliance on it to support a Finding of No Significant Impact.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #95

OFFICIAL MAP – OVERSTATES LEGAL EFFECT AND MISLEADS THE PUBLIC
ESC EAW Comment #**20**

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: "Official Mapping" Claims on the Website Overstate Legal Effect and Mislead the Public About Property Notice and Corridor Preservation

The project website states that officially mapping the corridor in 2000:

- identifies land for future public use,
- gives the public agency a first right of refusal if land is up for development,
- shows the corridor on the title record of affected property, and
- creates a formal map at the County Recorder's Office.

These statements overstate the legal and practical effect of a recorded planning map and are not supported by the public record or subsequent governmental actions.

Identifies land for future public use: Identification alone does not preserve land for public use. Preservation requires affirmative actions such as right-of-way acquisition, plat reservations, zoning/development restrictions, or consistent enforcement through permitting. Instead, the City and County approved annexations, subdivisions, and permanent residential construction within the mapped alignment, demonstrating the corridor was not preserved.

First right of refusal: While the Joint Powers Agreement contemplated preservation mechanisms, the public record shows these mechanisms were not exercised when corridor land was developed. Land was annexed, subdivided, and built upon without refusal, purchase, or preservation action.

Shows on title record of affected property: This claim is not supported by parcel-level records. The 2000 map was recorded as a planning document and was not tied to individual parcel IDs, nor carried forward through subsequent subdivision plats or re-recorded against successor parcels. Recorded deeds—including deeds to City-owned parcels—do not reflect a transportation reservation or right-of-way designation. The assertion that the corridor appears on "title record" is therefore inaccurate and misleading.

Recorded map at the Recorder's Office: Recording a planning map does not, by itself, preserve land, encumber title, or restrict development absent further affirmative action. The existence of a recorded map does not negate decades of contrary land-use decisions authorizing permanent construction within the remaining mapped corridor.

These misstatements materially affect public understanding of property rights, preservation history, and the environmental baseline used to justify the East Side Corridor. Residents repeatedly warned the County and City—through public meetings, written comments, and

direct communications—that the mapped corridor had been functionally and legally abandoned through decades of affirmative governmental action, including subdivision approvals, residential construction, and failure to preserve right-of-way. Despite this notice, the Responsible Governmental Unit continued to rely on the same abandoned corridor as a foundational premise of the Environmental Assessment Worksheet. Reliance on a corridor that was repeatedly abandoned constitutes **a false and unsupported baseline** that permeates the Environmental Assessment Worksheet. This defect is structural and cannot be cured through website corrections, post-hoc explanation, or disclosure of purported legal theories. Continued reliance on an abandoned corridor undermines the validity of the environmental review, precludes issuance of a Finding of No Significant Impact, and requires preparation of a full Environmental Impact Statement.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #96

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Incomplete Existing Conditions – Missing Baseline AADT

This comment addresses a discrete technical deficiency in the traffic analysis supporting the East Side Corridor Environmental Assessment Worksheet.

The traffic forecast memorandum states that existing AADT volumes were compiled “where available,” acknowledging that complete baseline traffic data does not exist for multiple roadway segments affected by the project. Several segments of the East Side Corridor do not currently exist, and other local roads lack recent traffic counts.

Traffic forecasts cannot be meaningfully evaluated without clearly documented baseline conditions. Adding projected trips to unknown or incomplete existing traffic volumes renders the 2026 and 2046 AADT estimates unverifiable. This lack of baseline data prevents the public from evaluating cumulative impacts, safety implications, and consistency with roadway design assumptions, making the EAW incomplete.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #97

Missing Referenced Cultural Resource and Project Documents – Incomplete EAW Record
EAW Comment #16

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Missing Referenced Cultural Resource and Project Documents – Incomplete EAW Record

This comment is submitted to address the absence of multiple documents that are explicitly referenced and relied upon in the Environmental Assessment Worksheet (EAW) for the East Side Corridor project but are not included in the publicly available record.

The EAW incorporates and relies upon correspondence from the Minnesota Department of Transportation Cultural Resources Unit (MnDOT CRU), including the letter titled *Re: S.P. 074-070-009, East Side Corridor Project, Sec. 1, 12, 13, 14, 23, 24 – T107N – R20W & Sec. 36 – T108N – R20W, Steele County*. Beginning on page 199 of the EAW, the federal review section references multiple supporting documents that are not provided in the EAW or its appendices and are not otherwise available for public review.

Missing referenced documents include, but are not limited to:

- **Area of Potential Effects (APE) Maps**
  - SP074_070_009APE_FullMap.pdf
  - SP074_070_009APE_NorthMap.pdf
  - SP074_070_009APE_SouthMap.pdf
- **Project Layout and Profile Documents**
  - *East Side Corridor + Profile* (dated March 18, 2025)
  - *S.P. 074-070-009 Project Layout 3B* (June 4, 2024)
- **Cultural Resource Investigations and Assessments**
  - *Phase I Archaeological Investigation, MnDOT CSAH 8 Realignment Project (SP 074-070-009), Steele County, Minnesota* (Westwood Professional Services, January 2025)
  - *Phase I and II Architecture/History Investigations for the Proposed MnDOT CSAH 8 Realignment Project (SP 074-070-009), Steele County, Minnesota* (Westwood Professional Services, January 2025)
  - *Architecture/History Assessment of Effects for CSAH 8 (SP 074-070-009), Steele County, Minnesota* (Westwood Professional Services, January 2025)

These documents are repeatedly referenced by MnDOT CRU and are clearly relied upon to support findings related to cultural resources, avoidance, impacts, and federal compliance. However, because these materials are not included in the EAW or made available to the public, residents are unable to review the underlying analyses, maps, or conclusions on which the EAW depends.

An environmental review may not rely on undisclosed supporting documents. The absence of these referenced materials prevents meaningful public participation, impairs the ability to

evaluate impacts and avoidance measures, and renders the EAW incomplete and misleading. Without access to the documents cited in the federal review section, the public cannot independently assess cultural resource impacts or the validity of the conclusions presented.

Because the EAW relies on missing supporting documentation, it does not provide an adequate factual basis for environmental review and cannot support a finding of no significant impact.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #98

Public Comment – Noise Mitigation, Federal Obligations, and Safety (East Side Corridor EAW)
EAW Comment #24

Date: December 28, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Public Comment – Noise Mitigation, Federal Obligations, and Safety (East Side Corridor EAW)

The County asked residents from North Country Subdivision to respond to the three noise "options" presented. None of those options constitute lawful noise mitigation. Landscaping and a 6-foot fence do not meet any recognized noise standards and do not satisfy the County's obligations under MEPA or NEPA.

While the County may claim exemption from certain numeric noise thresholds, it is **not exempt from identifying, addressing, and mitigating noise impacts**. The EAW fails to do so. Further, despite statements that federal funding has been dropped, the EAW documents that the East Side Corridor is a **federal undertaking** and therefore remains subject to applicable federal regulations, including federal noise requirements.

Under MEPA and NEPA, impacts must be addressed in the following order: **Avoid, Minimize, Mitigate**. **Avoidance remains the preferred and required option** because it prevents the substantial, documented noise impacts altogether.

If the County refuses to pursue avoidance, we are willing to accept a **noise berm that complies with Minnesota and Federal noise regulations, including Minn. R. 7030 and 23 C.F.R. Part 772**, spanning the full length of the subdivision—not landscaping or decorative grading. Any berm relied upon as mitigation must, at a minimum and without limitation:

- **Block line of sight**, equivalent in function to a **20-foot noise wall**;
- **Meet applicable MnDOT engineering standards**, including but not limited to **1:3 or 1:4 slope ratios**;
- **Fully address stormwater impacts**, including but not limited to preventing any increase in runoff or drainage onto adjacent properties;
- Be **entirely contained on public property**;
- **Require no private easements or encroachment** onto residential land; and
- **Exclude any roadway connections to Timberwood Lane or Fox Hollow Lane**, which would increase traffic, noise, and safety impacts and reduce mitigation effectiveness.

Any use of residential property—**even temporary**—for construction, grading, access, utilities, drainage, or other purposes would constitute a taking and **trigger eminent domain and condemnation proceedings**, as acknowledged on the County's own website.

As noted in the EAW, the County has referenced berms "similar to Deer Trail Lane NE." Those berms were constructed where residential development occurred *after* the roadway existed.

Here, the proposed project represents a **highway encroaching on established homes**, which requires a different mitigation analysis and heightened protections under MEPA and NEPA.

If the County asserts that a berm meeting these criteria cannot be provided, the County must identify an alternative noise mitigation measure that achieves the **same functional performance**, such as a **20-foot noise wall** identified in the project's noise study as reasonable, feasible, and recommended. The need for mitigation of this magnitude confirms the severity of impacts and reinforces that **avoidance is the legally required first option**.

The County's consideration of mitigation at this scale demonstrates that the project will cause **significant environmental impacts**. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an **Environmental Impact Statement (EIS)**. These issues and appropriate mitigations were excluded from the EAW, rendering it inadequate. An EIS is needed.

I incorporate by reference the detailed **Owatonna East Side Corridor group noise comment** submitted into the EAW record.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly impacted resident

Comment #99

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Predetermination Through Improper Reliance on the "Imagine Owatonna 2050" Comprehensive Plan

Project materials and the official project video explicitly assert that the *Imagine Owatonna 2050* Comprehensive Plan identified **29th Avenue as the preferred location** for the East Side Corridor. At timestamp **3:28–3:35**, the narrator states:

> *"A key element of the plan was identifying 29th Avenue as the preferred location for the new north-south road on the east side of the City."*
> *Source: https://youtu.be/zDO3GhWSP58?si=roAHAzIA3SXHWANp&t=208*

This assertion is procedurally improper and reflects a fundamental misapplication of a visioning document. Comprehensive plans and vision plans articulate **policy goals and long-term aspirations**; they do not select, authorize, or justify **specific roadway alignments**. Corridor identification and alignment selection must result from transportation planning, engineering analysis, alternatives evaluation, and environmental review—not from a non-binding planning document.

By presenting *Imagine Owatonna 2050* as having identified a preferred corridor location, the project narrative reverses the lawful planning sequence. The transcript portrays the vision plan as the basis for selecting 29th Avenue, with subsequent studies framed as implementation rather than evaluation. This sequence constitutes predetermination, as it implies that alignment selection occurred prior to—and independent of—environmental review and alternatives analysis.

This mischaracterization is reinforced by the project timeline presented in the video. The narration states that the East Side Corridor Study began in 2021 (3:09–3:18), while *Imagine Owatonna 2050* was released in 2023 (3:23–3:28). Despite this, the video retroactively assigns alignment selection authority to the comprehensive plan, creating the false impression that the plan legitimized a corridor choice that should have remained open for study and public input.

Contemporaneous Planning During Environmental Review

Importantly, Imagine Owatonna 2050 was developed **while** East Side Corridor environmental studies were already underway—not before them. Per the county's vides, the East Side Corridor Study began in 2021, although not made public until July 2022, and environmental review activities continued through the period in which Imagine Owatonna 2050 was being drafted, discussed, and finalized, culminating in its release in 2023.

When a comprehensive vision plan is created contemporaneously with an active project-specific environmental review, it cannot lawfully be treated as an upstream policy basis for alignment selection. Under MEPA, planning documents developed in parallel with environmental review must remain neutral and may not be used to memorialize, legitimize, or reinforce assumptions that are still subject to alternatives analysis. Treating a contemporaneous vision plan as having "identified" a preferred corridor location improperly collapses planning and review into a single outcome-driven process.

This sequencing further undermines the project narrative presented in the official video. Rather than Imagine Owatonna guiding subsequent corridor evaluation, the record shows overlapping processes in which corridor assumptions were advanced while environmental review was still ongoing. That overlap is incompatible with MEPA and NEPA's requirement that alternatives remain genuinely open until environmental impacts are evaluated and subjected to public participation.

Legal Status and Limits of the Imagine Owatonna 2050 Comprehensive Plan

As a matter of law, Imagine Owatonna 2050 is not a formal or "official" map. It is a comprehensive vision and policy document that provides high-level guidance on land use and transportation goals, but it does not establish transportation corridors, reserve right-of-way, impose land-use controls, or authorize specific roadway alignments. The plan is not recorded with the County Recorder, is not parcel-specific, and does not carry regulatory or siting authority. While such plans may inform future studies, they cannot lawfully select or legitimize a specific roadway alignment. Treating Imagine Owatonna 2050 as having identified a preferred corridor location therefore overstates its legal effect and improperly substitutes a non-binding vision plan for the transportation planning and environmental analysis required under MEPA.

Further, the transcript repeatedly frames official mapping, joint powers agreements, and planning documents as collectively establishing the East Side Corridor alignment (2:18–2:56), without acknowledging that these actions did not preserve right-of-way, did not preclude alternative alignments, and did not satisfy MEPA's requirement for comparative environmental analysis. The reliance on policy documents to substantiate alignment choice improperly substitutes narrative continuity for environmental justification.

MEPA requires that alternatives remain genuinely open until impacts are evaluated and subjected to public participation. Using a comprehensive plan to identify a "preferred location" prior to completion of environmental review undermines the integrity of the alternatives analysis and materially contributes to predetermination.

Accordingly, because the EAW relies on a planning premise that improperly treats Imagine Owatonna 2050 as having identified a preferred roadway alignment, the alternatives analysis is fundamentally constrained and predetermination is embedded in the environmental review. An environmental document based on a predetermined alignment cannot support a Finding of No

Significant Impact (FONSI), as it fails to provide the objective, comparative evaluation of reasonable alternatives required under MEPA. This flaw is substantive and cannot be remedied through clarification or minor revision. Preparation of a full Environmental Impact Statement (EIS) is therefore required to correct the defective baseline, reopen the alternatives analysis, and ensure informed decision-making.

The statement cited above appears in the official project video published on the East Side Corridor website and hosted on YouTube. To preserve the public record, a copy of the video as it appeared on 12/23/2025 has been archived and is available at https://youtu.be/zDO3GhWSP58. The original source was linked from the ESC project website to https://www.youtube.com/watch?v=IOPTzrVn35s.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #100

Date: December 20, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Predetermination and Improper Sequencing Affecting Environmental Review

The Environmental Assessment Worksheet is procedurally inadequate because key decisions regarding alignment and alternatives were made prior to completion of environmental review and prior to meaningful public participation.

As documented in project correspondence, certain alternatives were removed from further consideration before the alternatives evaluation was released for public review and comment. Environmental studies addressing wetlands, noise, traffic, and other impacts proceeded despite the absence of public review of the alternatives evaluation and without incorporation of public input on alignment selection.

Project representatives also acknowledged that avoidance measures — including shifting the roadway hundreds of feet east to reduce residential noise impacts — were technically feasible but were not evaluated due to non-environmental considerations such as development agreements and cost. Avoidance analysis was deferred until after a "preferred alternative" was selected.

Additionally, statements by project officials indicate that further public meetings regarding alternative selection were viewed as unnecessary or confusing, despite unresolved concerns. This approach conflicts with MEPA's requirement for early and continuous public participation and undermines the reliability of the environmental review.

Through a public data request, I obtained internal project correspondence between Steele County and MnDOT staff regarding the East Side Corridor project. This correspondence reflects that key decisions regarding alignment and alternatives were being treated as resolved prior to completion of environmental review and prior to public review and comment. It further reflects that avoidance measures were acknowledged as technically feasible but were deferred or dismissed due to non-environmental considerations. This correspondence is included as Exhibit A for the record.

Because environmental review and public participation occurred after key decisions were functionally made, the EAW cannot serve as a basis for a Finding of No Significant Impact. Preparation of an Environmental Impact Statement is required.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

From: Cabral Neto, Fausto (DOT) [redacted]
Sent: Monday, September 30, 2024 8:11 AM
To: Fenske, James W (DOT)
Subject: FW: Request for Clarification on East Side Corridor Project Updates and Concerns

fyi

From: Cabral Neto, Fausto (DOT)
Sent: Monday, September 30, 2024 7:29 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Bottos, Elisa (DOT) [redacted] Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: RE: Request for Clarification on East Side Corridor Project Updates and Concerns

Hello Paul,

I suggest to you, or your team, verify if are there new commentary among the new email that have not been responded to in 2023.
Provide response to those comments in combination to the commentary that will be received at future public meetings informing when it was initially addressed.
An environmental document captures all public input and provided responses.
In some instances, the already given answers can be repeated, if issues that it relates to haven't changed from the time when it was initially addressed.

Thanks

Fausto Cabral PE MS-ISE
507 251 1930
District State Aid Engineer
MN DOT District 6

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Monday, September 30, 2024 6:32 AM
To: Cabral Neto, Fausto (DOT) [redacted]; Bottos, Elisa (DOT) [redacted] Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: Re: Request for Clarification on East Side Corridor Project Updates and Concerns

Looking for any thoughts on how to respond to this email full of inaccuracies and misinformation. Melissa has twisted things to meet her own agenda here. Shall we set up a teams meeting to discuss a response?I suggest a meeting with MnDOT, city and county engineers and administrators.

The study did look at all alternatives. She unfortunately doesn't like the fact that her preferred alternative didn't get past the purpose and need for the project and that we didn't study it in more detail. There are many reports in the memo outlining how we studied traffic and other information to come to that conclusion.

She's under the impression we were going to have a public meeting to discuss the chosen alternative but we already did, back in May 2023. There will be another public meeting for the final environmental document with a 30 day public comment period. And we've told her that. A meeting now will only confuse the majority of the public. I've gotten many comments of confusion why we even started over (NPCE vs PCE), so don't want to confuse the public even more.

The entire memo is public on our website and available for her to read. We put it out there as quick as possible just for her. And we've told her that. Including the previous 2 memos (purpose and need and evaluation criteria). We'll make other reports(wetlands, archaeological, traffic, noise, etc.) available on the website as we complete them. And I've told her that. I mentioned we have a few other updates to the website, but only just to summarize that 3rd memo. It takes time for our consultant to draft changes and then for the county and city to review before going live. And we are working on a newsletter to update the public. That will come soon. And we've told her that. Melissa needs to be patient.

We are doing a noise wall study. And a noise wall is only one alternative we are looking at. She was at the board meeting when we showed the board several options we are considering. That will come with all the other mitigation things that we must do. We've told Melissa many times that we can't look at mitigation, avoidance until we have the preferred alternative. Now we are starting those processes now that we have the memos completed.

I'm not sure how she has misunderstood that I said a noise wall will not be considered. Certainly I've said it's not in the county's interest due to the cost and if there is a way to avoid a wall we will. But we still need to follow the federal process and it will be considered. And I've told her that.

We aren't ready to discuss publicly, but other options to avoid the wall and address federal noise standards include moving the road 600-800 feet east, assuming it reduces noise impacts. It is feasible from the federal standpoint. How ever it has serious ramifications to the city and township and their development agreements, serious impacts to farmland since we already own 6 acres of land along the subdivision, and it would affect several farmer and their land, serious implications to area farmers and the many other people, who unlike Melissa, have always understood the road was going there and have told us they'd be very unhappy if we move it, serious impacts in how the city would redevelop that land with utilities, etc. All that discussion will like be looked at and included in the final reports.

The mitigation studies she is asking for is going to happen as we study impacts now and come up with avoidance and mitigations as we complete the environmental documentation. She needs patience. Ultimately she will unlikely be unhappy with the final results but we need to think of the county and city as a whole and not just her back yard.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 | M: (507) 475-2253 | paul.sponholz@steelecountymn.gov

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From: Lyssa Lynn [redacted]
Sent: Sunday, September 29, 2024 9:39 PM
To: Cabral Neto, Fausto (DOT) [redacted]
Cc: Gade, Dale (DOT) [redacted] Matthew Sennott [redacted]; Bottos, Elisa (DOT) [redacted]; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: Re: Request for Clarification on East Side Corridor Project Updates and Concerns

Hi Fausto,

We've reached out to the county and continue to receive conflicting information. Initially, we were told the current report needed to study all alternatives, but it didn't. We were also informed that there would be an open house and public comment period, with comments permanently tied to the project and used to determine the chosen alternative, but that isn't happening either. Additionally, we were assured that all information would be made public, yet as of Friday, Paul mentioned only some of it is now available. It feels as though the county and city are determined to push this project through, and as residents significantly impacted by this unprecedented initiative, we're simply trying to understand our rights, the process, and how to hold the RGU accountable.

If the county provided accurate information, transparency, and prioritized residents' safety, we wouldn't have needed to reach out. If you're not the right person to help us navigate this process and clarify what should be happening, could you please direct us to someone who can?

Unfortunately, the county has consistently proven to be an unreliable source of accurate information, starting from day one when Paul himself stated there were no plans for mitigation because other roads, built before homes, didn't require it—an entirely different situation. In last week's presentation, mitigations were mentioned, but only one complied with MNDoT regulations for noise mitigation. Over the last 2.5 years, Paul has repeatedly said a noise wall option wouldn't be considered, and while it was finally presented as an option, we have little confidence that anything is being handled correctly at this level. No options were provided to reroute in order to avoid noise impacts, which should be the case whenever possible. We're not downtown Minneapolis—it's possible here.

I appreciate your assistance in directing us to the right contact.

Thanks,
Melissa

On Fri, Sep 27, 2024, 1:11 PM Cabral Neto, Fausto (DOT) [redacted] wrote:

> Ms. Melissa Zimmerman,
>
> Please direct your inquiries to Steele County.
>
> Paul Sponholz is the new Steele County Engineer and I have his email on the cc list above.
>
> So far county has been following proper FHWA procedures for this project.
>
> Best Regards,
>
> Fausto Cabral PE MS-ISE
>
> 507 251 1930

Comment #101

Date: December 21, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Procedural Irregularities, Engineer Oversight Gaps, and Professional Responsibility Concerns

I am submitting this comment to document serious procedural irregularities and oversight gaps affecting the preparation, review, and submission of the Environmental Assessment Worksheet (EAW) for the East Side Corridor project.

1. Absence of a County Engineer During Critical Project Advancement

From June 6 through October 28, Steele County did not have a County Engineer. During this period, the project continued to advance. County Administrator Renae Fry testified under oath on October 17, 2025, that the County lacked a County Engineer during this timeframe.

The absence of a qualified engineer raises fundamental questions about who exercised technical oversight, verified environmental information, and made project-related decisions during this period.

2. Interim Engineer Review Timeline and EAW Execution

The EAW cover page is dated November 2025 and was signed by the Interim County Engineer on November 5, 2025. Given the appointment timeline of October 28, 2025, this allowed approximately five days for review of a 352-page EAW, or the 3.5yr ESC project, prior to execution.

The Interim Engineer's subsequent lack of familiarity with core project elements—demonstrated during the December 11, 2025 open house—calls into question whether a meaningful review occurred at all.

3. Lack of Project Familiarity by the Interim Engineer

At the December 11 open house, the Interim Engineer:

- was unaware of Alternative 3B;
- was unaware that portions of the proposed right-of-way are within approximately 17 feet of existing homes, or that homes sat on the 150' mapped corridor;
- provided inaccurate statements regarding noise studies and mitigation;
- did not disclose that the project is a federal undertaking; and
- misstated the RGU's role in reviewing and responding to public comments.

These deficiencies indicate that the Interim Engineer had not sufficiently reviewed or understood the EAW prior to signing it.

4. Professional Responsibility Concerns

Minnesota Board of AELSLAGID standards prohibit engineers from signing and certifying work that they did not prepare or adequately review. The circumstances surrounding the timing, execution, and demonstrated lack of familiarity with the EAW raise serious concerns regarding compliance with professional licensure obligations.

5. Governance and Accountability

The project advanced materially during a period when no County Engineer was in place, followed by rapid execution of a voluminous EAW by an Interim Engineer with limited project knowledge. This sequence raises unresolved questions regarding:

- who was responsible for technical decision-making;
- who verified environmental data submitted to agencies; and
- whether appropriate professional oversight existed at critical stages.

Conclusion

These procedural irregularities undermine confidence in the integrity of the environmental review process. An EAW prepared, advanced, and executed under these circumstances cannot be presumed accurate or reliable and further supports the need for preparation of a full Environmental Impact Statement (EIS).

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #102

Website Unavailability, Project Inactivity Signals, and Timing of Public Comment Period
EAW Comment #17

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Website Unavailability, Project Inactivity Signals, and Timing of Public Comment Period

This comment is submitted to document impaired public awareness and transparency resulting from the unavailability of the official East Side Corridor project website during a critical period of project transition and immediately preceding the opening of the EAW public comment period.

From approximately **June 6 through October 28, 2025**, Steele County did not have a county engineer. During this same general timeframe, the primary project website, www.eastsidecorridor.com, became inaccessible beginning on **June 16, 2025**, was allowed to **expire on June 27, 2025**, and remained unavailable for several months.

The website was restored on **November 16, 2025**. The public comment period for the Environmental Assessment Worksheet opened shortly thereafter, on **November 18, 2025**.

Because the project website served as the primary public-facing source of information, its extended unavailability—combined with the absence of an identified county engineer and the lack of public updates or status information—created the reasonable public perception that the project was inactive and that no substantive decisions were occurring during that period. Residents reasonably believed the project had stalled or paused.

The restoration of the official project website immediately prior to the opening of the public comment period limited the public's opportunity to reorient, review materials, and understand the status of a project that had appeared dormant for months. Meaningful public participation depends on timely, accessible, and continuous access to information. The circumstances described above impaired public understanding of project status and further contribute to the procedural deficiencies in the environmental review process.

This period of impaired access occurred while an active **Minnesota Government Data Practices Act** proceeding involving the East Side Corridor project was active, during which residents substantially prevailed and maximum statutory consequences were imposed. The absence of accessible, county-hosted project materials during this period further impaired meaningful public awareness and participation, while residents were already being denied meaningful access to project data, as later confirmed by an Administrative Law Judge.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #103

Purpose & Need Collapse
EAW Comment #23

Date: December 27, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Purpose and Need Collapse: Lack of a Demonstrated Transportation Problem

The East Side Corridor (ESC) Environmental Assessment Worksheet fails to demonstrate a legitimate transportation purpose and need as required under MEPA and NEPA. When current, accurate traffic data are applied, the foundational claims of congestion, capacity deficiency, poor connectivity, and travel-time inefficiency do not hold. What remains is a project that primarily enables future development, which is not a lawful basis for advancing a transportation project under environmental review statutes.

Current Traffic Data Undermines the Claimed Transportation Need

The EAW relies on traffic volumes and growth assumptions derived from the 2040 Transportation Plan and earlier datasets. However, the most recent traffic counts show that traffic volumes on nearly all roadways cited as justification for the project have declined substantially—by approximately 8–20 percent—relative to earlier counts.

Roadway	From	To	2019 AADT	2040 AADT	2024 AADT	2046 AADT	Capacity	Current V/C	Capacity Change
Bridge St	Park Dr NW	Selby Ave	15400	20,500	11,123	14,807	22,000	0.51	-19.4%
18 St SW	CR 45	Hartle Ave	6200	9,500	6,550	10,036	10,000	0.66	3.5%
North St	CR 45	Cedar Ave	8900	11,300	6,959	8,836	10,000	0.70	-19.4%
Cedar Ave	North St	16 St NE	7200	9,200	5,521	7,055	10,000	0.55	-16.8%
Mineral Springs Rd	Freemont St	Cherry St	7900	9,300	7,025	8,270	10,000	0.70	-8.8%
Mineral Springs Rd	Cherry St	St. Paul Rd	9300	10,100	7,825	8,498	10,000	0.78	-14.8%

**There was no 2019 data, next most recent 2011 data used

Figure 1: Todays traffic counts vs the counts use in the 2040 Transportation plan.

Future Traffic = Current Traffic * (1 + Growth Rate)^Number of Years.

Using updated AADT values from MnDOT TrafficViewer and applying the same growth rates used in the 2040 Transportation Plan, projected future volumes remain well below roadway capacity on all corridors cited in the Purpose and Need. Where capacity concerns were previously asserted, those concerns no longer exist when accurate baseline data are used.

Traffic data accuracy is not a secondary consideration under MEPA or NEPA. It is the foundation of transportation need. Where current data contradicts claimed congestion or capacity deficiency, the purpose and need analysis collapses.

EAW – Purpose and Need

1. Alleged Poor Connectivity Is Not Supported

The EAW characterizes Owatonna as suffering from "poor north–south connectivity" that necessitates construction of the East Side Corridor. However, Owatonna's roadway network developed as a spoke-and-wheel system centered on downtown, a design that inherently funnels traffic toward the city center rather than around it. This configuration reflects intentional planning choices that prioritize access to civic, commercial, and residential destinations rather than bypass travel.

Because of this network structure, through-traffic is naturally limited, and travel between destinations continues to route through downtown regardless of the addition of a parallel corridor. Construction of a new north–south roadway does not alter this fundamental travel behavior and therefore does not resolve the asserted connectivity concern. The EAW provides no analysis demonstrating that the ESC would meaningfully change travel patterns or eliminate downtown routing.

The County further asserts that north–south arterial spacing of one to three miles is required. However, the County's own spacing maps show that all studied alternatives—including those prematurely eliminated—meet this criterion. As shown in Figure 2, the 34th Avenue alternative lies approximately three miles from Cedar Avenue and one mile from CSAH 43, fully satisfying the stated spacing standard.

Spacing, therefore, is not a legitimate eliminating factor. The continued exclusion of alternatives that meet the County's own connectivity criteria indicates premature elimination rather than a demonstrated transportation need.

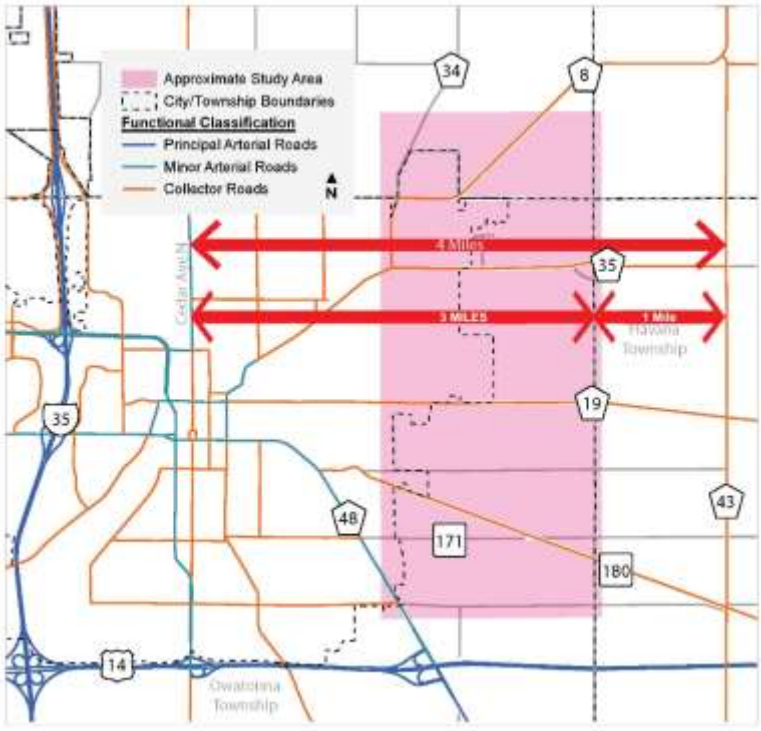


Figure 2: County Spacing Map Showing All Alternatives Meet Arterial Spacing Criteria

2. Downtown Congestion Is Unsupported and Methodologically Inflated

Claimed Congestion Relief Is Based on Inflated and Outdated Traffic Analysis

The Preferred Alternative Federal Memorandum asserts that the East Side Corridor (ESC) could reduce downtown traffic volumes by approximately 800 vehicles and produce nominal travel-time savings of approximately one second. However, the methodology used to derive these figures materially inflates the purported benefit.

At the intersection of Mineral Springs Road and Bigelow Avenue—a T-intersection—WSB counted all traffic on Bigelow Avenue and all traffic on Mineral Springs Road east of the intersection as eligible for diversion by the ESC. This approach double-counts individual vehicles. A vehicle approaching from Bigelow or traveling west on Mineral Springs Road will either exit the count area or enter the adjacent segment; it cannot be removed twice from the network. Treating these movements as separate diverted vehicles improperly inflates the estimated benefit.

In addition, no analysis was performed to determine whether traffic on Bigelow Avenue is destination-based, including trips associated with nearby schools. Destination-based traffic would not be diverted by a peripheral corridor and would continue to use existing routes. The assumption that such traffic would shift to the ESC further overstates congestion relief.

Even with these inflated assumptions, the analysis shows that the ESC would provide measurable benefit to only a single roadway segment—Mineral Springs Road between Cherry Street and St. Paul Road. This outcome contradicts the project's stated purpose of providing broad relief to downtown collector and arterial roadways. If the only segment identified as approaching capacity is not, in fact, operating at or near capacity, then the remaining downtown congestion claims necessarily fail as well.

Table 12 of the Federal Memorandum, which was submitted to federal agencies in support of a preferred alternative, relies on several unsupported assumptions. First, it assumes that construction of the ESC would result in no additional traffic on the affected downtown roadways. Second, the "No Build" traffic volume of 10,100 AADT is derived from the 2040 Transportation Plan using a 0.41 percent average annual growth rate applied to older baseline counts. Third, these calculations were not updated to reflect post-COVID traffic conditions, despite documented traffic declines of 30–60 percent statewide and substantially lower observed volumes in Owatonna. Fourth, the memorandum notes that Alternatives 2–4 would produce similar traffic outcomes, yet Alternative 4 was eliminated without further study.

When current traffic counts are used and the same growth rate is applied consistently, the results differ materially from those presented in the Federal Memorandum. Applying the formula

Future Traffic = Current Traffic × (1 + Growth Rate)^Years

to the 2024 AADT for Mineral Springs Road (7,825 vehicles) yields a projected future volume of approximately 8,492 vehicles.

As shown in Figure 3, this results in a volume-to-capacity ratio of approximately 0.85 under the no-build condition and approximately 0.78 under Alternatives 2–4—well below capacity thresholds. This

represents lower traffic volumes than those observed in 2019 and directly contradicts the claim that downtown congestion necessitates construction of the ESC.

Table 12. Downtown congestion impact of Alternatives 2-4.

Roadway	From	To	No Build AADT	No Build V/C	Alt 2-4 AADT	Change	Alt 2-4 V/C
Mineral Spgs Rd	Fremont St	Cherry St	9,300	0.93	8,500	-800	0.85
Mineral Spgs Rd	Cherry St	St Paul Rd	10,100	1.01	9,300	-800	0.93
Cedar Ave	North St	16th St NE	9,200	0.92	9,200	0	0.92

Roadway	From	To	No Build AADT	No Build V/C	Alt 2-4 AADT	Change	Alt 2-4 V/C
Mineral Spgs Rd	Cherry St	St. Paul Rd	8,492	0.85	7,825	- 667	0.78

Figure 3. Future traffic projections using current AADT - Mineral Springs Road operates below capacity.

Despite the Federal Memorandum's conclusion that Alternatives 2–4 would yield the same traffic benefits, Alternative 4 was removed from consideration without further study, undermining the objectivity of the alternatives analysis.

Assumed Downtown Through-Traffic Is Unsupported by Data or Observed Travel Behavior

The EAW asserts that traffic traveling between the northeast part of Owatonna and U.S. Highway 14, or other southern destinations, requires indirect travel through downtown Owatonna and contributes to downtown congestion and residential cut-through traffic. However, no empirical data are provided to support this claim. No origin–destination study, route choice analysis, or local street traffic counts were conducted to substantiate assumed travel patterns.

Instead, routing assumptions appear to have been made without verification and do not align with observed resident travel behavior. Residents of the North Country neighborhood report routinely avoiding downtown routes when traveling to destinations, even when doing so requires less direct travel. With limited exceptions for specific destinations, such as trips to the Hy-Vee area via Main Street and Oak Avenue, downtown is generally avoided rather than used as a through-route.

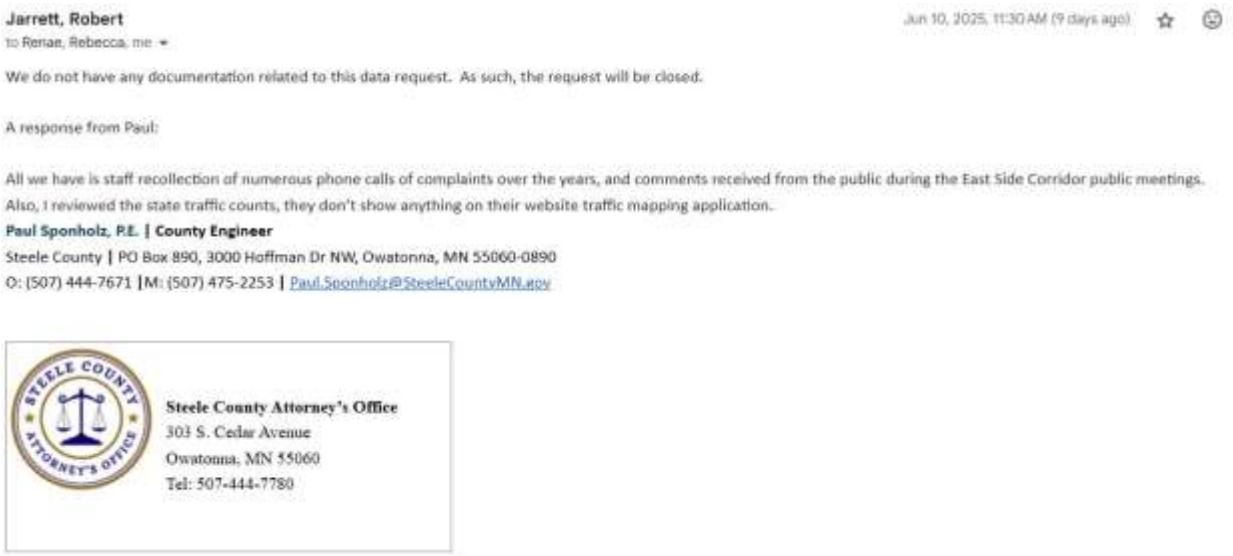
This disconnect between assumed and actual travel behavior further undermines the claim that the East Side Corridor would meaningfully reduce downtown congestion. Without data demonstrating that significant through-traffic currently uses downtown routes—and would divert to the proposed corridor—the asserted congestion relief remains **speculative and unsupported**.

3. Residential Street Traffic Claims Are Unsupported by Data

The EAW asserts that "considerable through traffic" uses local residential streets, including Crestview Lane, Shady Avenue, and Countryview Avenue. If accurate, this would represent a serious transportation and safety concern. However, the EAW provides no empirical data to support this claim.

MEPA and NEPA require analytical evidence to substantiate assertions of transportation impacts. Despite repeated requests over multiple years, no traffic studies, traffic counts, or origin–destination analyses were conducted on these residential streets. In June 2025, Steele County confirmed that no

such studies exist and that the claim is based solely on recollections and informal communications rather than measured data.



Jarrett, Robert
to Renae, Rebecca, me

Jun 10, 2025, 11:30 AM (9 days ago)

We do not have any documentation related to this data request. As such, the request will be closed.

A response from Paul:

All we have is staff recollection of numerous phone calls of complaints over the years, and comments received from the public during the East Side Corridor public meetings. Also, I reviewed the state traffic counts, they don't show anything on their website traffic mapping application.

Paul Sponholz, P.E. | County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

STEELE COUNTY ATTORNEY'S OFFICE

Steele County Attorney's Office
303 S. Cedar Avenue
Owatonna, MN 55060
Tel: 507-444-7780

Figure 4 - Data request response shows no traffic studies exist for Crestview Lane or Shady Avenue.

As shown in Figure 4, data request responses confirm the absence of traffic studies for Crestview Lane and Shady Avenue. MnDOT TrafficViewer further corroborates that no traffic count data exists. Where no data exist, conclusions regarding "considerable through traffic" cannot be supported and cannot lawfully form the basis for a transportation purpose and need.

In the absence of any empirical analysis, residents documented observed traffic conditions to illustrate the disconnect between claimed and actual conditions. While these observations are not offered as a substitute for formal traffic studies, they underscore the absence of congestion or capacity issues on the cited residential streets. Recorded observations during multiple trips, including peak periods, show minimal traffic volumes inconsistent with claims of significant through traffic. (https://youtube.com/shorts/2tye-azfqMI)

Countryview Avenue, in particular, functions as a dead-end roadway serving destination-based residential traffic only. Crestview Lane experiences periodic increases associated with specific events, such as school-related activities at BrookTree Golf Course, but these are episodic, destination-driven movements that would not be diverted by construction of the East Side Corridor. Such traffic does not represent a systemic transportation deficiency.

The EAW itself acknowledges that these routes are "local streets intended to provide access to residential areas and not to provide mobility for through traffic." No evidence is presented to show that these streets are currently functioning outside that role or that construction of a new arterial corridor would materially alter travel behavior. Absent data demonstrating existing or projected through traffic volumes, the residential street traffic justification remains speculative and unsupported.

4. Claimed Travel Time Benefits Are Based on Unsupported Assumptions

The EAW asserts that the East Side Corridor (ESC) would reduce travel times to selected destinations. However, the travel time analysis does not rely on standard transportation methodology. Instead of applying basic, transparent calculations, travel times were derived from assumptions about routing behavior and distances that are not supported by the record. In several instances, distances appear to have been overstated or understated in ways that favor the preferred alternative.

When accurate distances are used and travel times are calculated using standard formulas **(Time = Distance ÷ Speed)**, the asserted benefits materially change. As shown in Figure 5, Alternative 3 produces travel times that are approximately equivalent to existing conditions, offering little to no improvement. Alternative 4, by contrast, results in consistently shorter travel times across the evaluated routes.

This outcome is explained by design assumptions acknowledged in project materials. WSB presentations indicate that the northern segment of the preferred alternative would operate at approximately 40–45 miles per hour. Lower operating speeds necessarily increase travel time and diminish any claimed efficiency advantage. When these speed assumptions are applied consistently, the preferred alternative does not outperform other options.

Importantly, Alternative 4 not only yields superior travel time performance but also avoids direct impacts to existing residential neighborhoods, thereby avoiding noise impacts and the need for mitigation measures such as noise walls. Despite providing equal or superior transportation performance with fewer environmental and community impacts, Alternative 4 was eliminated from further consideration without adequate justification. This undermines the credibility of the travel time analysis as a basis for purpose and need.

Residental Analysis of Alternatives Using Matememathical Formulas + Stops

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi
3	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
	26th St NE & Kenyon Rd	10 min/4.8	13min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7min/2.8 mi	10 min/4.3 mi	9 min/5.7 mi
4	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
	26th St NE & Kenyon Rd	8 min/5.1 mi	11 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	6 min/3.3 mi	9 min/4.8 mi	10 min/6.0 mi
5	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
	26th St NE & Kenyon Rd	9 min/6.1 mi	12 min/7.8 mi	
	Country View Ave & Fox Hollow Ln	7 min/4.3 mi	10 min/5.8 mi	11 min/7.0 mi

faster than existing
similar/shorter distance
slower than existing

**Alternative 3 in it's proximity to homes will cause a slower roadway - assumed a 40mph travel speed.
**Factored in 30 seconds for each of 4 stops on each route. Most stops do not take 30 seconds.

Figure 5. Travel time comparison using accurate distances and standard calculation methods.

5. Development Considerations Cannot Supply a Transportation Purpose and Need

While the Environmental Assessment Worksheet does not formally identify development as part of the project's purpose and need, development objectives are documented elsewhere in the project record. The project website states that *"the lack of a complete transportation network limits the potential for new development to occur in this area"* and cites inconsistency with the City of Owatonna's Development Plan, which identifies the area as a primary growth zone as part of the project's purpose and need. This framing introduces development enablement as a justification for the project outside the EAW's stated purpose and need.

The EAW further includes a land use map identifying a "Future Destination" on page 337. The parcel depicted is owned by the Owatonna School District and has long been designated for a future elementary school. The property has been held by the School District since the prior iterations of the East Side Corridor study in the 1990s and early 2000s, either through purchase or donation, and has remained in public ownership for more than two decades. It currently generates educational and agricultural value through use by the FFA program.

Recent elementary school redistricting was undertaken due to capacity constraints, temporarily alleviating overcrowding but not eliminating the long-term need for an additional elementary school as the community grows. The identified parcel represents a viable and cost-effective site for that purpose. Conversion of this publicly owned school property for private development would impose substantial replacement costs on taxpayers and diminish future public infrastructure options.

Locating or routing a high-capacity roadway adjacent to property intended for an elementary school raises additional concerns, as it would expose children and other vulnerable populations to elevated noise and traffic impacts. These impacts are not addressed in the context of land use compatibility within the Purpose and Need analysis.

Taken together, these materials demonstrate that development objectives are influencing the project's justification, even though they are not disclosed as part of the formal purpose and need. MEPA and NEPA do not permit transportation projects to be justified by speculative development or growth-inducing objectives. Purpose and need must be grounded in an actual, demonstrated transportation deficiency. Reliance on development plans, future land use assumptions, or growth accommodation improperly substitutes land-use goals for a lawful transportation purpose and undermines the validity of the environmental review.

Other Material Inaccuracies Undermining Purpose and Need

Several additional inaccuracies in the EAW further undermine the validity of the project's stated purpose and need.

Inaccurate Capacity Claims in EAW Tables

Table 4 of the EAW indicates that North Street East and Mineral Springs Road are operating near capacity. However, the table contains both geographic and numerical errors. North Street East does not run between CSAH 45 and Cedar Avenue North as described, indicating either a mislabeling of roadway segments or incorrect traffic attribution.

In addition, the traffic volumes used in Table 4 do not reflect current AADT. When corrected traffic counts are applied, both roadways operate well below capacity, as shown in Figure 6. Under corrected data, North Street East operates at a volume-to-capacity ratio of approximately 0.69, and Mineral Springs Road operates at approximately 0.78—well within acceptable operating conditions.

Table 4 - Asserts that North Street East and Mineral Springs Road are operating near capacity.

Roadway Name	Road Owner	From	To	Vehicles Per Day	Roadway Capacity (Vehicles Per Day)	V/C Ratio
North St E	City of Owatonna	CR 45	Cedar Ave N	8,900	10,000	.89
Mineral Springs Rd	City of Owatonna	Cherry St	St. Paul Rd	9,300	10,000	.93

Roadway Name	Road Owner	From	To	Current AADT	Roadway Capacity (Vehicles Per Day)	V/C Ratio
North St E	City of Owatonna	CR 45	Cedar Ave N	6,959	10,000	.69
Mineral Springs Rd	City of Owatonna	Cherry St	St. Paul Rd	7,825	10,000	.78

Figure 6 – Corrected traffic volumes show roads operating below capacity.

Similarly, Table 3 of the EAW lists CSAH 8 (Kenyon Road) as carrying 1,760 vehicles per day. The correct traffic volume is approximately 849 vehicles per day; the higher value appears to have been improperly taken from a different roadway segment (26th Street). These inaccuracies materially affect conclusions regarding congestion and roadway performance.

Table 3 – Inaccurate traffic volumes reported for CSAH 8.

Roadway Name	Functional Class	Owner Daily	Traffic Volumes*
CSAH 8 (Kenyon Rd)	Major Collector	Steele County	1,760 (2024)

Updated Traffic Projections Contradict EAW Conclusions

When current 2024 traffic counts are used and the same growth rates from the 2040 Transportation Plan are applied consistently, projected 2046 volumes show that nearly all evaluated roadways and intersections continue to operate below capacity. As shown in Figure 8, only 18th Street Southwest is projected to approach capacity by 2046.

Importantly, Figure 1 shows that 18th Street is also the only corridor where traffic has increased in recent years. The Federal Memorandum further indicates that construction of the East Side Corridor is expected to increase traffic volumes on 18th Street, exacerbating—not alleviating—the only identified

capacity concern.

Table 5 – Roadways Approaching and Exceeding Capacity (2046)

Roadway	Road Owner	From	To	Vehicles Per Day	Roadway Capacity (Vehicles Per Day)	V/C Ratio
Bridge St W	City of Owatonna	Park Dr NW	Selby Ave SW	20,500	22,000	0.93
18th St SW	City of Owatonna	CR 45	Hartle Ave SE	9,500	10,000	0.95
North St W	City of Owatonna	CR 45	Cedar Ave N	11,300	10,000	1.13
Cedar Ave N	City of Owatonna	North St W	16th St NE	9,200	10,000	0.92
Mineral Springs Rd	City of Owatonna	Fremont St E	Cherry St NE	9,300	10,000	0.93
Mineral Springs Rd	City of Owatonna	Cherry St NE	St. Paul Rd NE	10,100	10,000	1.01

Source: Steele County 2040 Transportation Plan

Figure 8 – 2046 V/C based on today's traffic and growth percentages from the 2040 Transportation Plan

Roadway	From	To	2024 AADT	2046 AADT	Capacity	2046 V/C
Bridge St	Park Dr NW	Selby Ave	11,123	14,807	22,000	0.67
18 St SW	CR 45	Hartle Ave	6,550	10,036	10,000	1.00
North St	CR 45	Cedar Ave	6,959	8,836	10,000	0.88
Cedar Ave	North St	16 St NE	5,521	7,055	10,000	0.71
Mineral Springs Rd	Freemont St	Cherry St	7,025	8,270	10,000	0.83
Mineral Springs Rd	Cherry St	St. Paul Rd	7,825	8,498	10,000	0.85

The EAW also asserts a projected 35 percent increase in school-related traffic as an additional justification for the project. However, the relevant school opened in 2023, and traffic counts were updated in 2024. Actual data from Bixby Road show a decrease in traffic from approximately 4,200 vehicles per day to 4,144 vehicles per day. The asserted increase is speculative and contradicted by observed conditions.

Traffic counts are generally updated on a five-year cycle. The 2024 data represent a substantial departure from earlier assumptions and directly undermine nearly all stated transportation justifications for the project, with the exception of newly introduced development considerations.

Alternatives Analysis and Premature Elimination

The Federal Memorandum acknowledges that Alternatives 2, 3, and 4 would produce equivalent transportation benefits. Despite this, Alternative 4 was eliminated without additional analysis, even though it avoids direct impacts to existing residential neighborhoods and reduces the need for mitigation measures. Elimination of an alternative that provides equivalent performance without documented justification reflects premature elimination rather than a transportation-based distinction.

Conclusions

- All evaluated alternatives meet the stated roadway spacing criteria.
- Downtown congestion claims are unsupported and rely on outdated or inflated data; when current data are applied, the asserted need does not exist.
- No empirical data support claims of substantial through traffic on Shady Avenue, Crestview Lane, or Countryview Avenue, nor is there evidence that such traffic would be diverted by the East Side Corridor.
- When travel times are calculated using accurate distances and standard formulas, 29th Ave/Alternative 3 does not outperform existing conditions or eliminated alternatives.
- Development objectives appear to be driving the project in the absence of a demonstrated transportation deficiency.

MEPA and NEPA require analytical data that are accurate, current, and objectively applied. When corrected traffic data are used, the record presents a materially different picture than that relied upon in the EAW. The 2040 Transportation Plan itself anticipates relatively stable population through 2030 followed by slight decline through 2060 and identifies only two roadways approaching capacity, both within the City of Owatonna. The East Side Corridor does not address those locations and, by the project's own analysis, would worsen conditions on one of them.

The East Side Corridor would substantially benefit future growth areas while imposing significant impacts on existing residents, particularly within the North Country neighborhood. Residents have consistently requested avoidance of this neighborhood for more than three years based on safety, health, and quality-of-life concerns. These objections are not rooted in opposition to growth, but in the absence of a demonstrated transportation need and the availability of less harmful alternatives.

Where a project's stated purpose and need fail to demonstrate an actual transportation problem, a Finding of No Significant Impact cannot be supported. Proceeding under these circumstances requires either preparation of an Environmental Impact Statement to evaluate reasonable alternatives—including no-build—or termination of the project due to the absence of a lawful public transportation purpose.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident
Mathematics and Computer Science, B.S.

**The County was made aware of these inaccuracies, yet no supplemental public notice or comment period was provided to allow the public to attach their comments to the project.*

Comment #104

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Speculative School Siting Used as Traffic Input

This comment addresses a discrete technical deficiency in the traffic analysis supporting the East Side Corridor Environmental Assessment Worksheet.

The memorandum states that the Owatonna School District is "planning for a future elementary school near the intersection of the East Side Corridor and Rose Street." The referenced parcel is labeled "Future Destination" and has not been approved, sited, funded, or environmentally reviewed by the school district.

Treating a speculative school location as a traffic generator improperly inflates traffic projections and embeds undisclosed assumptions into the analysis. The EAW also fails to evaluate the safety, noise, air quality, and pedestrian impacts associated with placing a high-capacity roadway adjacent to a potential elementary school. This omission is particularly concerning given the presence of children and school transportation needs.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #105

Inadequate Traffic Methodology – No Travel Demand Model
EAW Comment #10

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Inadequate Traffic Methodology – No Travel Demand Model

The April 3, 2024 WSB traffic forecast memorandum states that *"a travel demand model was not developed for this project."* The East Side Corridor is a new roadway intended to serve future growth and redistribute traffic across the local and regional network. Without a travel demand model, the EAW lacks any validated analysis of route choice, traffic redistribution, induced demand, or cumulative network impacts.

Trip assignment based solely on assumed origins and destinations cannot substitute for a network-level model when evaluating a new corridor. This omission prevents meaningful assessment of whether the project will actually reduce congestion, shift traffic patterns, or create new impacts on surrounding neighborhoods. As a result, the transportation analysis is methodologically inadequate and cannot support a finding of no significant impact.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #106

Unverifiable Traffic Estimates Using ITE Trip Generation
EAW Comment #13

Date: December 23, 2025
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Unverifiable Traffic Estimates Using ITE Trip Generation

This comment addresses a discrete technical deficiency in the traffic analysis supporting the East Side Corridor Environmental Assessment Worksheet.

The EAW relies on trip generation rates from the Institute of Transportation Engineers Trip Generation Manual (11th Edition) but does not disclose the land-use codes, independent variables, assumed development sizes, selected trip rates, or directional distributions used in the calculations.

ITE trip generation estimates trips generated by a defined land use; it does not replace traffic counts or traffic impact analysis. Without disclosure of the required inputs and assumptions, the traffic projections cannot be reproduced or verified by the public. This lack of transparency violates the requirement for meaningful environmental review and undermines the validity of the projected AADT values.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #126

ESC EAW Comments #52

EAW Comment – Community Petition Supporting the 34th Avenue Alternative

Request for Consideration in Environmental Review

The undersigned petitioners respectfully request that decision-makers fully consider the environmental, safety, land-use, and agricultural impacts identified above and evaluate alignment alternatives that place a meaningful distance between high-speed traffic and existing neighborhoods. This includes consideration of impacts to **prime farmland**, **farmland bisection**, **floodplains**, and **increased flood risk**, as well as the cumulative effects of introducing a high-speed corridor in areas not designed for such use.

Locating the corridor at a safer distance—such as along **34th Avenue**, an existing **minimum-maintenance roadway corridor**—would reduce foreseeable safety risks, noise impacts, residential disruption, agricultural fragmentation, and floodplain-related impacts while utilizing an established north–south alignment. Evaluating this alternative would also reduce the need for new right-of-way acquisition through developed neighborhoods and productive agricultural land.

This petition is submitted for inclusion in the Environmental Assessment Worksheet (EAW) record as evidence of **substantial public concern**, the existence of a **reasonable and less impactful alternative**, and the need for careful consideration of safer planning options as part of the environmental review process.

Petition Summary

As of submission, this petition includes:

- **704 total signatures**
  - **580 online signatures**
  - **124 paper signatures**

Signatories include residents of Owatonna and surrounding communities who are directly and indirectly affected by the proposed East Side Corridor project.

Submission Statement

This petition and accompanying materials are submitted for inclusion in the official EAW administrative record for the East Side Corridor project and should be considered as part of the alternatives analysis and environmental impact evaluation.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

MOVE THE EAST SIDE CORRIDOR PROJECT OUT
Protect Owatonna Residents' Safety
December 31, 2025

Petition Summary:

704 Signatures Total
580 Signatures Online
124 Signatures on Paper

Residents of Owatonna and Steele County are urgently voicing their concern over the proposed East Side Corridor project, which threatens the safety of families by placing a 40-55mph highway just feet from their homes. This petition is a call to action to reconsider the plans and build the highway at 34th Ave, a safer location for residents.

Why It's Important:

The proposed highway will bring high-speed traffic dangerously close to homes, endangering families, children, and local residents. A highway with speeds of 40-55 mph is simply too close for safety. Additionally, it cuts through substantial floodplains and prime farmland bisecting farms and creating flood risks. The 704 signers of this petition demand that the city and county explore safer alternatives to protect the community.

"I can't imagine the highway being so close to my children's play area. It feels like a threat to their safety every day."
– Local Resident

Request for Consideration in Environmental Review

The 704 undersigned petitioners respectfully request that decision-makers fully consider the environmental, safety, land-use, and agricultural impacts identified above and evaluate alignment alternatives that place a meaningful distance between high-speed traffic and existing neighborhoods. This includes consideration of impacts to **prime farmland**, **farmland bisection**, **floodplains**, and **increased flood risk**, as well as the cumulative effects of introducing a high-speed corridor in areas not designed for such use.

Locating the corridor at a safer distance along **34th Avenue**, an existing **minimum-maintenance roadway with owned right-of-way**—would reduce foreseeable safety risks, noise impacts, residential disruption, agricultural fragmentation, and floodplain-related impacts while utilizing an established north–south alignment. This petition is submitted for inclusion in the EAW record as evidence of public concern and the need for careful evaluation of safer and less impactful planning alternatives.

Petition Strength

10 Great

Add a Decision Maker

An important piece of information for you and your supporters.

Review Decision Maker

Owatonna & Steele County to repurpose Residential Street for Highway

Share this petition

This petition had 580 supporters

Recent signers:

Klein S. • 3 hours ago Spencer M. • 11 hours ago Roseann H. • 11 hours ago jane S. • 14 hours ago Annie F. •

Decision Makers: Don McCann +12

5 Supporter Voices

8 Updates

The Issue

The Problem

Steele County and the City of Owatonna are proposing a very dangerous and short-sighted plan to **repurpose a planned neighborhood city street and replace it with a highway known as the "East Side Corridor" with speeds up to 55mph.** This route is located directly adjacent to established neighborhoods and is not even wide enough to accommodate this type of road. **Owatonna needs a north-south route east of town, but this location is not the answer! Historically, all other major routes built in the county, Old Hwy 14, Hwy 218, 26th St., etc., were in place before residential areas encroached on *them*.**

Most concerning, imposing a highway on this route would be detrimental to the safety of dozens of small children at play, many with disabilities. There are also residential care homes with many at-risk adults in these neighborhoods. Put simply, it's not safe! This proposed route also hinders future growth of Owatonna. We need amenities on the east side of town such as a grocery store, gas station, and other small businesses. Putting a highway right alongside zoned residential neighborhoods does not allow for this, and is poor planning.

A highway next to neighborhoods also introduces heavy truck traffic within feet of existing homes. The presence of semi-trucks means **extremely loud engine braking ("jake braking") which will not only impact the immediate neighborhoods but also create noise disruptions for residences 2+ miles away!** This will compromise the quiet, small-town feel of Owatonna for nearly half of its residents.

Share this petition

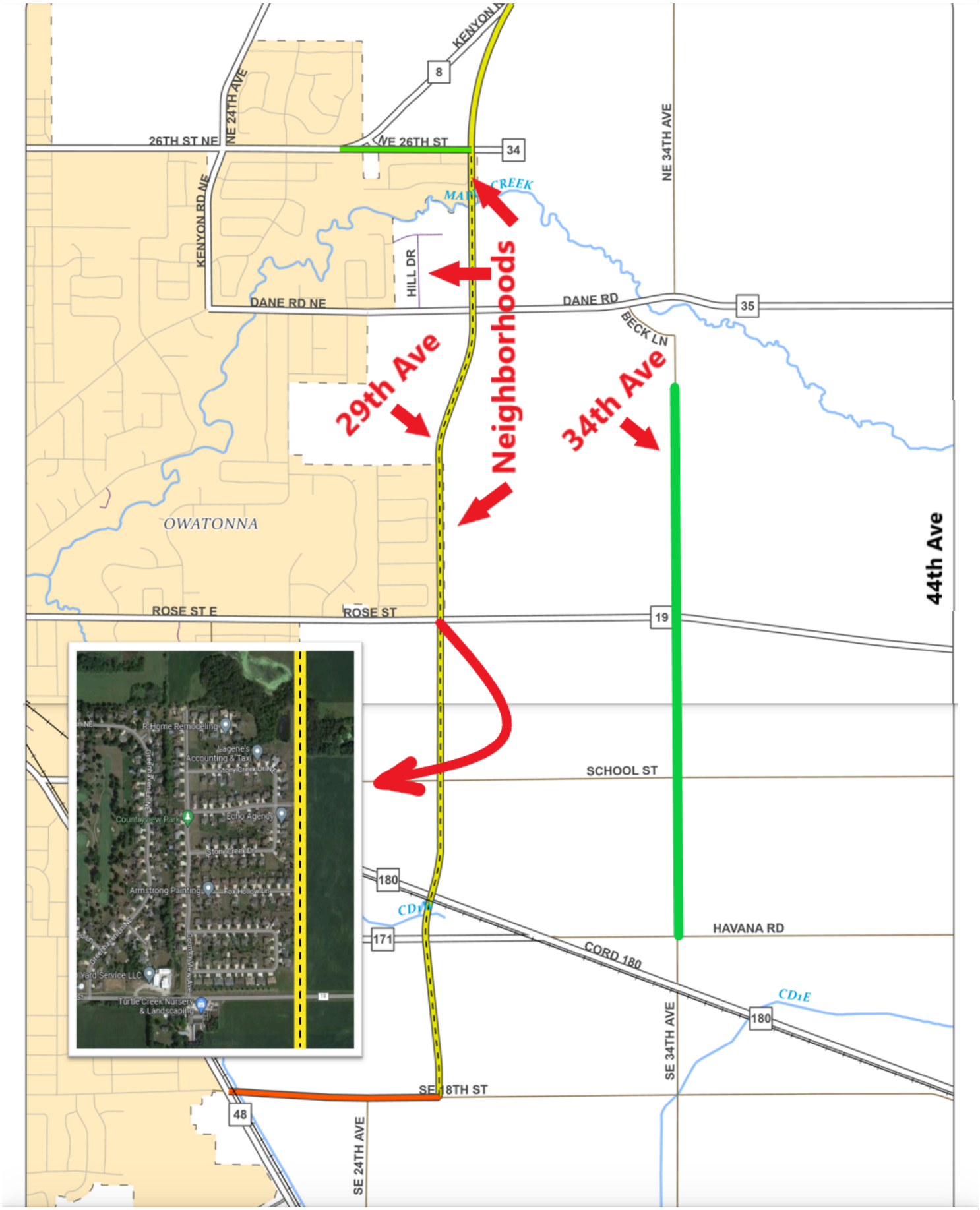
The Solution

A half-mile further east, there is an already-established north-south roadway called 34th Avenue. A north-south highway here would put a safe distance between existing neighborhoods and high-speed traffic, **ensure safety, reduce noise levels for residents and promote future growth. Previous environmental and impact studies, including MN DOT (** see page 30 of 2004 Beltline Study**), have also recommended 34th Avenue.** Over the past three decades, residents of Owatonna have also been recommending the use of 34th Avenue (Pages 59-77 of the 1995 Environmental Report**).** All but 1.5 miles of 34th Avenue is an existing roadway. **Building the East Side Corridor at 34th Avenue is the safest, most fiscally responsible location, and it allows for the right kind of development and growth for Owatonna.**

It's time for the city and county officials to listen to the citizens they serve! We insist on safety, sound planning and long-term sustainability and growth for our town. 34th Avenue offers all of this and is the right choice for Owatonna!

Please Act Now!

We need your help, your voice, your signature on this petition to show support for this safer, more sustainable long-term solution for Owatonna. Please join us in raising awareness of this petition by sharing it within your networks. Like, share, and follow our Facebook page for more information or stay up to date with via our website: www.owatonnaeastsidecorridor.com


KENYON LN
8
NE 24TH AVE
26TH ST NE
NE 26TH ST
34
NE 34TH AVE
KENYON RD NE
MAIN CREEK
HILL DR
DANE RD NE
DANE RD
35
BECK LN
29th Ave
Neighborhoods
34th Ave
44th Ave
OWATONNA
ROSE ST E
ROSE ST
19
SCHOOL ST
180
CD1F
171
HAVANA RD
CORD 180
CD1E
180
SE 34TH AVE
SE 18TH ST
48
SE 24TH AVE
R Home Remodeling
Jagene's Accounting & Tax
Story Creek Drive
Countryview Park
Echo Agency
Story Creek Dr
Armstrong Painting
Fox Hollow Ln
Yard Service LLC
Turtle Creek Nursery & Landscaping

Legal Disclaimer:
I swear (or affirm) that I know the contents and purpose of this petition and that I signed this petition only once and of my own free will. All information must be filled in by person(s) signing the petition unless disability prevents the person(s) from doing so.

Report a policy violation

Owatonna East Side Corridor
Petition Starter

Media inquiries

The Decision Makers

Don McCann
Owatonna City Council Member

Awaiting response

Name	City	State	Postal Code	Country	Signed On
Cassie Backlund	Owatonna	MN	55060	United States	8/15/2023
Ashlynn Geary	Owatonna	MN	55060	United States	8/15/2023
Lorenzo Pacheco	Owatonna	MN	55060	United States	8/15/2023
Rakel Kircher	Owatonna	MN	55060	United States	8/15/2023
Stephen Sennot	Owatonna	MN	55060	United States	8/15/2023
Tonia Sennott	Owatonna	MN	55060	United States	8/15/2023
Matthew Sennott	Owatonna	MN	55060	United States	8/15/2023
Ross Zimmerman	Owatonna	MN	55060	United States	8/15/2023
Brian Deml	Owatonna	MN	55060	United States	8/15/2023
Nicole Schulz	Owatonna	MN	55060	United States	8/15/2023
Kathie Hansen-Stratton	Owatonna	MN	55060	United States	8/15/2023
Chris Backlund	Minneapolis	MN	55060	United States	8/15/2023
Mike Broll	Owatonna	MN	55060	United States	8/15/2023
Jennifer Wale	Northfield	MN	55057	United States	8/15/2023
Nicole Schamp	Claremont	MN	55924	United States	8/15/2023
Melissa Worke	Owatonna	MN	55060	United States	8/15/2023
Owatonna East Side Corridor	Owatonna	MN	55060	United States	8/15/2023
Jessica Matz	Mankato	MN	56001	United States	8/16/2023
Brenda Christianson	Owatonna	MN	55060	United States	8/16/2023
Katie Randall	Owatonna	MN	55060	United States	8/16/2023
Austin Ward	Corvallis	OR	97330	United States	8/16/2023
Nanette Bateman	Owatonna	MN	55060	United States	8/16/2023
Mike Bateman	Owatonna	MN	55060	United States	8/16/2023
Colin Whalen	Owatonna	MN	55060	United States	8/16/2023
PAULA DEML	Owatonna	MN	55060	United States	8/16/2023
Katie Todd	Owatonna	MN	55060	United States	8/16/2023
Chelsie Hansen-Stratton	Owatonna	MN	55060	United States	8/16/2023
Art Ortega	Owatonna	MN	55060	United States	8/16/2023
Toni Wehner	Owatonna	MN	55060	United States	8/16/2023
Emma Hansen	Claremont	MN	55942	United States	8/16/2023
Sue Geary	Owatonna	MN	55060	United States	8/16/2023
Beth Owens	Owatonna	MN	55060	United States	8/16/2023
Cameron Ihrke	Faribault	MN	55021	United States	8/17/2023
Emily Butler	Owatonna	MN	55060	United States	8/17/2023
Jen Narum	Owatonna	MN	55060	United States	8/18/2023
Kelsey Buchardt	Owatonna	MN	55060	United States	8/18/2023
Ashlyn Hansen	Owatonna	MN	55060	United States	8/18/2023
Von Petersen	Owatonna	MN	55060	United States	8/19/2023
Janell McLeish	Owatonna	MN	55060	United States	8/20/2023
Amber Madrid	Faribault	MN	55021	United States	8/21/2023
Scorpion Warrior	Los Angeles	CA	90027	United States	8/26/2023
Samson Tekle	Burnsville	MN	55337	United States	8/26/2023
Skeleton Key	Los Angeles	CA	90027	United States	8/26/2023
Robert Ackerman	Owatonna	MN	55060	United States	8/26/2023
Petros Woldehawariat	Robertsdale	AL	36567	United States	8/26/2023
Gordon Poston	Kingstree	SC	29556	United States	8/26/2023
G. Diane Matthews-Marcelin	Owatonna	MN	55060	United States	8/26/2023

michelle ceballos	Phoenix	AZ	85014	United States	8/26/2023
Adam Worke	Faribault	MN	55021	United States	8/27/2023
Charles Goodson	Denver	CO	80222	United States	8/28/2023
Regina Brooks	Pittsburgh	PA	15209	United States	8/28/2023
Anita Mizrachi	Haddonfield	NJ	8033	United States	8/28/2023
Faith Hansen	Rowland Heights	CA	90631	United States	8/28/2023
Emmanuel Rivera	Las Cruces	NM	88001	United States	8/28/2023
Clarissa Elidrissi	Jacksonville	NC	28540	United States	8/28/2023
Thersa Rogers	Breckenridge	MI	48615	United States	8/28/2023
Sonic Son	Oroville	CA	95966	United States	8/28/2023
Andrew Floyd	Owatonna	MN	55060	United States	8/28/2023
haley auger	Carlisle	PA	17013	United States	8/28/2023
Diane Hampton	Belleville	MI	48111	United States	8/29/2023
Sherri Lopez	Los Lunas	NM	87031	United States	8/29/2023
Tom Aanenson	Owatonna	MN	55060	United States	8/31/2023
Asher Westgard	Duluth	MN	55806	United States	9/6/2023
Curt Orchard	Owatonna	MN	55060	United States	9/6/2023
Casandra Long	Kokomo	IN	46902	United States	9/6/2023
Ashley Covault	Rochester	MN	55901	United States	9/6/2023
Ava Osborne	Shepherdsville	KY	40165	United States	9/6/2023
James Thomas	Atlanta	GA	30349	United States	9/6/2023
Melissa Zimmerman	Owatonna	MN	55060	United States	9/6/2023
Lynsey Hullopeter	Owatonna	MN	55060	United States	9/6/2023
Heaven Zerai	Irving	TX	75062	United States	9/6/2023
Jason Hunt	Saint Paul	MN	55103	United States	9/6/2023
Jessica Ellis	Whitehall	PA	18052	United States	9/6/2023
Pamela Holbert	Tucson	AZ	85711	United States	9/6/2023
jenny lawson	Cincinnati	OH	45236	United States	9/6/2023
Jillian Proft	Owatonna	MN	55060	United States	9/8/2023
Seth Muir	Owatonna	MN	55060	United States	9/16/2023
Kari Wiste	Owatonna	MN	55060	United States	9/17/2023
Greg Wiste	Owatonna	MN	55060	United States	9/17/2023
Ethan Wade	Owatonna	MN	55060	United States	9/18/2023
Devin Charles	New York	NY	10075	United States	9/18/2023
Sandra Muir	Owatonna	MN	55060	United States	9/18/2023
Jon Inwood	Brooklyn	NY	11201	United States	9/18/2023
Jimmy John	Nashville	TN	37209	United States	9/18/2023
Cardi Mosley	Westchester	IL	60154-4434	United States	9/18/2023
Autumn Carey	Atlanta	GA	30318	United States	9/18/2023
Jennifer Webster	Owatonna	MN	55060	United States	9/18/2023
Jerry Babcock	owatonna	MN	55060	United States	9/18/2023
Elizabeth Mckinley	Rochester	NY	14618	United States	9/18/2023
Gigi Cruz	Sugar Hill	GA	30518	United States	9/18/2023
B M	Owatonna	MN	55060	United States	9/18/2023
Ilana Appleby-Leo	Rochester	MN	55901	United States	9/18/2023
Jeff Salvatore	Stamford	CT	6902	United States	9/18/2023
Brayan Gavilan	Hialeah	FL	33012	United States	9/18/2023
Zach Snider	Radford	VA	24141	United States	9/18/2023
amira brown	Owatonna	MN	55060	United States	9/18/2023

Charla Mane	Petoskey	MI	49770	United States	9/18/2023
Milka Ndubuisi	Seneca	SC	29678	United States	9/18/2023
Darin Morrison	Mesquite	TX	75150	United States	9/18/2023
Joseph Ward	Baltimore	MD	21213	United States	9/19/2023
Nicole Joachim	Owatonna	MN	55060	United States	9/19/2023
Cheryl Hancock	Minneapolis	MN	55404	United States	9/19/2023
Kristina Rachau	Centre Hall	PA	16828	United States	9/20/2023
Amanda Briegel	Virginia Beach	VA	23451	United States	9/20/2023
Jessica Onstad	Owatonna	MN	55060	United States	9/20/2023
Kaylie Murillo	Los Angeles	CA	90012	United States	9/20/2023
James Roche	Glenview	IL	60025	United States	9/20/2023
sarahi martinez	Charlotte	NC	28205	United States	9/20/2023
Kisha Coleman	Philadelphia	PA	19119	United States	9/20/2023
McKayla Hardisty	Oakdale	MN	55128	United States	9/20/2023
lillian frey	Livonia	NY	14487	United States	9/20/2023
Joshua Curphey	Peterborough		PE7	United States	9/20/2023
Chelsea Wendel	Owatonna	MN	55060	United States	9/22/2023
Camilla Liu	Whitestone	NY	11354	United States	9/23/2023
Jodi McMains	Owatonna	MN	55060	United States	9/23/2023
Wes McMains	Owatonna	MN	55060	United States	9/23/2023
Izayah Finley	San Francisco	CA	94134	United States	9/23/2023
Amelia Hale	Williamsburg	VA	23185	United States	9/23/2023
Kristina Rohman	Owatonna	MN	55060	United States	9/24/2023
ANTONIETA Sanchez Mendez	Owatonna	MN	55060	United States	9/24/2023
Tricia Buhrow	Owatonna	MN	55060	United States	9/28/2023
Brady Beenken-Adams	Owatonna	MN	55060	United States	9/30/2023
Tyrel Alastair Hunter	Owatonna	MN	55060	United States	10/1/2023
Becky Hunter	Owatonna	MN	55060	United States	10/1/2023
Ruth Pacheco	Owatonna	MN	55060	United States	10/3/2023
Rita Lique	Owatonna	MN	55060	United States	10/3/2023
Tyler Buchardt	Owatonna	MN	55060	United States	10/8/2023
Forrest Baublitz	Westminster	MD	21157	United States	10/8/2023
Nathan Janes	Louisville	KY	40296	United States	10/8/2023
Becky Dawley	Owatonna	MN	55060	United States	10/8/2023
William Tjon	Owatonna	MN	55060	United States	10/9/2023
Mike McLeish	Owatonna	MN	55060	United States	10/10/2023
Donald Mullenbach	Owatonna	MN	55060	United States	10/20/2023
Kristine Vogelgesang	Owatonna	MN	55060	United States	10/21/2023
Andreina Torres	Dayton	MN	55327	United States	10/30/2023
Andrew Adams	Owatonna	MN	55060	United States	10/30/2023
Chad Emberton	Owatonna	MN	55060	United States	10/30/2023
Danielle Capistrant	Owatonna	MN	55060	United States	11/1/2023
Heidi Worke	Owatonna	MN	55021	United States	11/1/2023
Rachelle judson	Owatonna	MN	55060	United States	11/1/2023
Dennis VanDenBerg	Owatonna	MN	55060	United States	11/4/2023
Max Carlson	Owatonna	MN	55060	United States	11/8/2023
Spencer McDermott	Owatonna	MN	55060	United States	11/8/2023
Abra Allen	Faribault	MN	55021	United States	11/8/2023
Christina Cordova	Minneapolis	MN	55401	United States	11/8/2023

Kate Lewis	Geneva	MN	56035	United States	11/8/2023
Mitch Toast	Faribault	MN	55021	United States	11/8/2023
E Whitehead	Owatonna	MN	55060	United States	11/8/2023
Roberta Eiseman	Houston	TX	77020	United States	11/8/2023
Bailey Gardner	Virginia Beach	VA	23462	United States	11/8/2023
Linda HerringJaworski	Owatonna	MN	55060	United States	11/8/2023
Lauren Everhard	Owatonna	MN	55060	United States	11/8/2023
Marcia Kleeberger	Owatonna	MN	55060	United States	11/8/2023
Heidi Severson	Faribault	MN	55021	United States	11/9/2023
Daniel Gorman	Owatonna	MN	55060	United States	11/9/2023
Jeff Otto	owatonna	MN	55060	United States	11/10/2023
BENJAMAN LAGESON	Owatonna	MN	55060	United States	11/10/2023
Hope Lageson	Owatonna	MN	55060	United States	11/10/2023
Elissa Cook	Owatonna	MN	55060	United States	11/10/2023
Adam Kaluba	Burleson	TX	76028	United States	11/11/2023
Becca McDaniels	Nashville	TN	37211	United States	11/11/2023
Griffin Coleman	El Paso	TX	79941	United States	11/12/2023
Vanessa Cardenas	Minneapolis	MN	55478	United States	11/14/2023
Mark Maslinski	Owatonna	MN	55060	United States	11/14/2023
Shane Shornock	Owatonna	MN	55060	United States	11/15/2023
Jeanne Hankerson	Owatonna	MN	55060	United States	11/15/2023
Zackery Knapton	Owatonna	MN	55060	United States	11/15/2023
Brian Bentley	Owatonna	MN	55060	United States	11/15/2023
Amy Shornock	Owatonna	MN	55060	United States	11/16/2023
Warren Coan	Lynn	MA	02176	United States	11/16/2023
Jeanne Pichner	Owatonna	MN	55060	United States	11/16/2023
Noah Worke	Owatonna	MN	55060	United States	11/16/2023
Pamela Mikeworth	Owatonna	MN	55060	United States	11/16/2023
Ben Hamele	Owatonna	MN	55060	United States	11/16/2023
Cindy Wilson Muldoon	Blooming Prairie	MN	55917	United States	11/16/2023
John Martin	Tucson	AZ	85712	United States	11/17/2023
Judy Gilman	Owatonna	MN	55060	United States	11/17/2023
Zamira Gilman	Owatonna	MN	55060	United States	11/17/2023
Piper Epperly	Pulaski	VA	24301	United States	11/17/2023
Samantha Kubat	Owatonna	MN	55060	United States	11/17/2023
Jesus isLORD	hamburg	NJ	7419	United States	11/18/2023
Renee Clemens	Minneapolis	MN	55428	United States	11/18/2023
Dorian Smith	Owatonna	MN	55060	United States	11/18/2023
Janice Deets	Owatonna	MN	55060	United States	11/18/2023
Rachelle Johnson	Owatonna	MN	55060	United States	11/18/2023
Jennifer Candullo	Owatonna	MN	55060	United States	11/18/2023
Shyanne Nordquist	Minneapolis	MN	55410	United States	11/18/2023
Abby Prouty	Bainbridge Island	WA	98110	United States	11/19/2023
Darrel Michels	Faribault	MN	55021	United States	11/19/2023
Calhoun Yvette	Waseca	MN	56093	United States	11/19/2023
Christopher Norbury	Owatonna	MN	55060	United States	11/19/2023
Erika Rikhiram	Clermont	FL	34711	United States	11/19/2023
Stephanie Ulrich	Minneapolis	MN	55478	United States	11/20/2023
Lucas Litke	Owatonna	MN	55060	United States	11/20/2023

Tiffany Conner	Minneapolis	MN	55404	United States	11/20/2023
Nolan Schuette	Owatonna	MN	55060	United States	11/20/2023
Dave Couture	Owatonna	MN	55060	United States	11/20/2023
Brian Wendel	Owatonna	MN	55060	United States	11/20/2023
Kim Klepetka	Owatonna	MN	55060	United States	11/20/2023
Edith Ikaku	Dallas	TX	75270	United States	11/20/2023
Josh Standiford	Lake Zurich	IL	60047	United States	11/21/2023
Del Bauer	Owatonna	MN	55060	United States	11/22/2023
Karla Bauer	Owatonna	MN	55060	United States	11/22/2023
Tyler Firme	Owatonna	MN	55060	United States	11/22/2023
Sue Bauer	Owatonna	MN	55060	United States	11/22/2023
Douglas Pichner	Owatonna	MN	55060	United States	11/23/2023
Matt Pichner	owatonna	MN	55060	United States	11/23/2023
Alicia Martin	Owatonna	MN	55060	United States	11/23/2023
Sara Pichner	Owatonna	MN	55060	United States	11/23/2023
Amy Gillis	Minneapolis	MN	55401	United States	11/23/2023
Kay Klemmer	Owatonna	MN	55060	United States	11/23/2023
Gene handel	Bensalem	PA	19020	United States	11/24/2023
Yoslen Robaina	Miami	FL	33155	United States	11/25/2023
Jojo Clark	Southaven	MS	38671	United States	11/25/2023
patrick weeeks	Fort Worth	TX	76116	United States	11/25/2023
Livia Laue	Owatonna	MN	55060	United States	11/26/2023
Joy Holmgren	Owatonna	MN	55049	United States	11/26/2023
penny Jensen	Owatonna	MN	55060	United States	11/29/2023
Monte Mowry	Owatonna	MN	55060	United States	12/8/2023
Ellen Kimmerle	Franklin Lakes	NJ	7417	United States	12/9/2023
Mark Schultz	Owatonna	MN	55060	United States	12/13/2023
Barb Walsh	Owatonna	MN	55060	United States	12/13/2023
Sandi Kurth	Owatonna	MN	55060	United States	12/14/2023
Linda Luoma	Minneapolis	MN	55478	United States	12/15/2023
susan Hayes	Rochester	NY	14623	United States	12/15/2023
Elijah Hopp	Elkader	IA	52043	United States	12/15/2023
Jane Burrows	Cincinnati	OH	45215	United States	12/16/2023
jill angelichio	charlotte	NC	28204	United States	12/16/2023
Susan Blacker	Owatonna	MN	55060	United States	12/16/2023
Layla Omalley	Phoenix	AZ	85029	United States	12/17/2023
Bob Shrimp	Spartanburg	SC	29302	United States	12/17/2023
Ashli Tingle	Castro Valley	CA	94546	United States	12/17/2023
Wendy Crawford	Lewistown	MT	59457	United States	12/17/2023
Reagan Shultz	Knox	PA	16232	United States	12/18/2023
Arianna Segrest	Detroit	MI	48235	United States	12/18/2023
darlene white	EASLEY	SC	29640	United States	12/18/2023
Latoya Richardson	Anniston	AL	36201	United States	12/18/2023
Ollie Autman	Joliet	IL	60433	United States	12/18/2023
Alice Markey	Hattiesburg	MS	39402	United States	12/18/2023
Tj Hill	Hull	GA	30646	United States	12/19/2023
Matt Nutzmann	Owatonna	MN	55060	United States	1/1/2024
Layne Hable	Omaha	NE	68116	United States	1/8/2024
Cassandra Kohn	Owatonna	MN	55060	United States	1/12/2024

Lance Woltman	Owatonna	MN	55060	United States	1/13/2024
Lori Krouze	Minneapolis	MN	55417	United States	1/19/2024
Joshua Swedberg	Owatonna	MN	55060	United States	1/20/2024
Dana Zakis	Apple Valley	MN	55124	United States	1/20/2024
Jen O'Connor	Faribault	MN	55021	United States	1/20/2024
Jes Hedberg	Owatonna	MN	55060	United States	1/20/2024
Ashley Betlach	Owatonna	MN	55060	United States	1/20/2024
Tina Gerlach	Owatonna	MN	55060	United States	1/20/2024
Jessa Herron	Minneapolis	MN	55060	United States	1/20/2024
Brandice Schoenbauer	Owatonna	MN	55060	United States	1/20/2024
Bob Bulver	Owatonna	MN	55060	United States	1/20/2024
Breanna Heise	Owatonna	MN	55060	United States	1/20/2024
Stacy Kubat	Owatonna	MN	55060	United States	1/20/2024
MJ Grubish	Owatonna	MN	55060	United States	1/20/2024
Lorraine Njos	Owatonna	MN	55060	United States	1/20/2024
Sheena Savoie	Owatonna	MN	55060	United States	1/20/2024
Amanda Remund	Morristown	MN	55052	United States	1/20/2024
Kristi Knapton	Owatonna	MN	55060	United States	1/20/2024
Kelsey Quast	Owatonna	MN	55060	United States	1/20/2024
Jenna Hansen	Blooming Prairie	MN	55917	United States	1/20/2024
Jason Macrunnels	Owatonna	MN	55060	United States	1/20/2024
Erin Doepke	Owatonna	MN	55060	United States	1/20/2024
Kim Chappuis	Owatonna	MN	55060	United States	1/20/2024
Melissa Rosecke	Owatonna	MN	55060	United States	1/20/2024
Kammi Szymanski	Owatonna	MN	55060	United States	1/20/2024
Jillian Proft	Owatonna	MN	55060	United States	1/20/2024
Marci Pikula	Minneapolis	MN	55421	United States	1/20/2024
Samantha Peterson	Blooming Prairie	MN	55917	United States	1/20/2024
Charity Slavk	Owatonna	MN	55060	United States	1/21/2024
Mindy Jimenez	Minneapolis	MN	55405	United States	1/21/2024
Lisa Ackerman	Owatonna	MN	55060	United States	1/21/2024
Grace Reuvers	Faribault	MN	55021	United States	1/21/2024
Charles Jarvi	Minneapolis	MN	55427	United States	1/21/2024
Melissa Mogen	Owatonna	MN	55060	United States	1/21/2024
Elissa Gautier	Owatonna	MN	55060	United States	1/21/2024
Tim Fitzgerald	Owatonna	MN	55060	United States	1/21/2024
Troy Malecha	Owatonna	MN	55060	United States	1/21/2024
Brittany Rogers	Minneapolis	MN	55431	United States	1/21/2024
Lindsey Flynn	Owatonna	MN	55060	United States	1/21/2024
Elyse Buck	Minneapolis	MN	55405	United States	1/21/2024
Hailey Swedberg	Minneapolis	MN	55454	United States	1/21/2024
katie Bruessel	Owatonna	MN	55060	United States	1/21/2024
Karla Zufall	Owatonna	MN	55060	United States	1/21/2024
Braydan Mahlman	owatonna	MN	55060	United States	1/21/2024
Jordan S	Owatonna	MN	55060	United States	1/21/2024
Amanda Stockwell	Owatonna	MN	55060	United States	1/21/2024
Cyndee Zylstra	Owatonna	MN	55060	United States	1/21/2024
Vickie Vavra	Owatonna	MN	55060	United States	1/22/2024
Tammy Ebeling	Owatonna	MN	55060	United States	1/22/2024

David Joachim	Claremont	MN	55924	United States	1/22/2024
Connor Whalen	Owatonna	MN	55060	United States	1/31/2024
Evan David	Owatonna	MN	55060	United States	2/3/2024
Katie Horn	Owatonna	MN	55060	United States	2/4/2024
Kathryn McDermott	Owatonna	MN	55060	United States	2/4/2024
Kathleen Sands	Owatonna	MN	55060	United States	2/5/2024
Theresa Harsma	Owatonna	MN	55060	United States	2/7/2024
Julien Giancola	Mentor	OH	44060	United States	2/8/2024
Ardis Woods	Owatonna	MN	55060	United States	2/10/2024
miles Engen	Owatonna	MN	55060	United States	2/14/2024
Peter Seykora	Owatonna	MN	55060	United States	2/14/2024
Valerie Skiba	Owatonna	MN	55060	United States	2/14/2024
William Ahlers	Owatonna	MN	55060	United States	2/14/2024
Rob Brainard	Owatonna	MN	55060	United States	2/14/2024
Brenda Rions	Owatonna	MN	55060	United States	2/14/2024
Timothy VanRavenhorst	Owatonna	MN	55060	United States	2/14/2024
Desiree LaFontaine	Owatonna	MN	55060	United States	2/14/2024
John Bulver	Owatonna	MN	55060	United States	2/14/2024
Emilee Orf	Owatonna	MN	55060	United States	2/14/2024
James Taylor	Owatonna	MN	55060	United States	2/14/2024
Tanya Artmann	Owatonna	MN	55060	United States	2/14/2024
David Fenlason	Owatonna	MN	55060	United States	2/14/2024
Victoria Schultz	Owatonna	MN	55060	United States	2/14/2024
Ashley Mcnichols	Kenyon	MN	55946	United States	2/14/2024
Marcia Kleeberger	Owatonna	MN	55060	United States	2/14/2024
Alana Preziosi	Swedesboro	NJ	8085	United States	2/15/2024
Christine Dauck	Minneapolis	MN	55404	United States	2/15/2024
Glenice Swenson	Lakeville	MN	55044	United States	2/15/2024
Margi Barsamian	Edmonds	WA	98026	United States	2/15/2024
Shannon Blatti	Ellendale	MN	56026	United States	2/15/2024
Melissa Toov	Owatonna	MN	55060	United States	2/15/2024
Marc Boyett	Owatonna	MN	55060	United States	2/15/2024
Gary Hrdlichka	Denver	CO	80202	United States	2/15/2024
Celelia Alexander	Owatonna	MN	55060	United States	2/15/2024
Maureen Ross	Medford	MN	55049	United States	2/15/2024
Jan stavenau	Owatonna	MN	55901	United States	2/15/2024
Bonnie Kidd	Owatonna	MN	55060	United States	2/16/2024
Jacob Dub	Owatonna	MN	55060	United States	2/16/2024
Jordan Whalen	Owatonna	MN	55060	United States	2/16/2024
Daniel Thompson	Charleston	WV	25312	United States	2/16/2024
Katelyn Bivens	Tellico Plains	TN	37385	United States	2/16/2024
Timothy Durner	Owatonna	MN	55060	United States	2/16/2024
Joy English	Owatonna	MN	55060	United States	2/17/2024
Cynthia Rau	Owatonna	MN	55060	United States	2/19/2024
Lori Orchard	Owatonna	MN	55060	United States	2/20/2024
Russell Bowar	Owatonna	MN	55060	United States	2/20/2024
Tali FARRELL	Columbus	OH	43204	United States	2/21/2024
Kellee Husband	Glennville	GA	30427	United States	2/21/2024
Mia'Jadee Wooten	Satellite Beach	FL	32936	United States	2/21/2024

Steven MUllis	Harrisburg	NC	27205	United States	2/21/2024
raul Lopez lll	Willard	MO	65781	United States	2/21/2024
Antonio Taylor	Minneapolis	MN	55429	United States	2/24/2024
Marcus Twaddle	Owatonna	MN	55060	United States	2/25/2024
Nolan Schuette	Owatonna	MN	55060	United States	2/26/2024
Crystal Paul	Grand Meadow	MN	55936	United States	2/26/2024
Jill pelovsky	Owatonna	MN	55060	United States	2/27/2024
Nancy Vroman	Owatonna	MN	55060	United States	2/28/2024
Keith richards	Owatonna	MN	55060	United States	3/5/2024
Jan Moravec	Owatonna	MN	55060	United States	3/5/2024
Roger Wiese	Owatonna	MN	55060	United States	3/5/2024
Aaron Litke	Owatonna	MN	55060	United States	3/6/2024
Brittney Bartsch	Owatonna	MN	55060	United States	3/6/2024
Julie Kubat Louks	Claremont	MN	55924	United States	3/7/2024
Lauri Loveridge	Owatonna	MN	55060	United States	3/8/2024
Patricia Braasch-Turi	Owatonna	MN	55060	United States	3/8/2024
Mary Schuette	Owatonna	MN	55060	United States	3/20/2024
Bruce Schuette	Owatonna	MN	55060	United States	3/20/2024
Kelly Kimball	Owatonna	MN	55060	United States	3/23/2024
Bridget Reyes-O'Connor	Owatonna	MN	55060	United States	3/23/2024
Shannon Horch	Waseca	MN	56093	United States	3/24/2024
Eric Wandersee	Faribault	MN	55021	United States	3/26/2024
Lisa Queen	Owatonna	MN	55060	United States	3/30/2024
Drew Kidd	Owatonna	MN	55060	United States	4/12/2024
Dale Benjamin	Owatonna	MN	55060	United States	4/18/2024
Chris Schulz	Owatonna	MN	55060	United States	4/18/2024
KRISTEN PETERSEN	Owatonna	MN	55060	United States	4/20/2024
Katherine Sailors	Owatonna	MN	55060	United States	5/6/2024
Keith Rumler	Owatonna	MN	55060	United States	5/18/2024
Aaron Ayen	Owatonna	MN	55060	United States	5/28/2024
Marie Olinger	Minneapolis	MN	55404	United States	5/31/2024
Holli Turek	Owatonna	MN	55060	United States	5/31/2024
Timothy Bronkema	New York	NY	10036	United States	6/3/2024
Jennie Morrone	Bath	PA	18014	United States	6/3/2024
Alonzo Gray	Rialto	CA	92377	United States	6/3/2024
M. Browning	Chandler	AZ	85224	United States	6/4/2024
Chrissa Campbell	Marietta	OH	45750	United States	6/4/2024
Sara Zapata	Owatonna	MN	55060	United States	6/4/2024
Julianne DeSilva	Syosset	NY	11791	United States	6/4/2024
Nancy Glater	Norwalk	CT	6854	United States	6/4/2024
Aria gyan-walitt	Oakland	CA	94601	United States	6/4/2024
Ana Montes	Millville	NJ	8332	United States	6/5/2024
henrique silva	New York	NY	10118	United States	6/5/2024
Marina Gai	Auburn Hills	MI	48326	United States	6/5/2024
Kathryn Salciccioli	Farmington	MI	48336	United States	6/5/2024
Diane Bloomquist	Lancaster	NY	14086	United States	6/5/2024
Jess Jones	Beloit	WI	53511	United States	6/5/2024
Kimberly Mireles	Harlingen	TX	78550	United States	6/6/2024
Nathan Lee	Daly City	CA	94015	United States	6/6/2024

coreese robinson	Tuscaloosa	AL	35401	United States	6/6/2024
Tony Racek	Owatonna	MN	55060	United States	6/7/2024
Yvonne Robbins	Owatonna	MN	55060	United States	6/7/2024
MacKenzie Noble	Medford	MN	55049	United States	6/8/2024
Melody Schwartz	Owatonna	MN	55060	United States	6/8/2024
Lana Johnston	Owatonna	MN	55060	United States	6/8/2024
June Stephens	Owatonna	MN	55060	United States	6/8/2024
Deb Kvam	Owatonna	MN	55060	United States	6/8/2024
Patti Abraham-Brekke	Owatonna	MN	55060	United States	6/8/2024
Jennifer Gathje	Owatonna	MN	55060	United States	6/8/2024
Jessica Taylor	Minneapolis	MN	55411	United States	6/8/2024
Bradley Olson	Owatonna	MN	55060	United States	6/9/2024
Katie Borgstahl	Faribault	MN	55021	United States	6/9/2024
Debra Stewart	New Ulm	MN	56073	United States	6/9/2024
Denaira Rumler	Owatonna	MN	55060	United States	6/9/2024
Jacob W	Shippensburg	PA	17257	United States	6/10/2024
Matthew Jessop	Owatonna	MN	55060	United States	6/10/2024
Daynoli Twenelez	Phoenix	AZ	87035	United States	6/10/2024
Edna Nagy	Santa Clara	CA	95051	United States	6/10/2024
Annie Holland	Owatonna	MN	55060	United States	6/12/2024
Nicole Tursi	Goodyear	AZ	85338	United States	6/23/2024
Ralphie Beam	Cumberland	MD	21502	United States	6/24/2024
Kristin Vass	New York	NY	10080	United States	6/24/2024
Katie Mefford	Indianapolis	IN	46260	United States	6/25/2024
Debbie E	Felton	DE	19943	United States	6/25/2024
N Saskl	Owatonna	MN	55060	United States	6/26/2024
Lisa Cardon	Minneapolis	MN	55941	United States	6/26/2024
Gina Russo	Chicago	IL	60639	United States	6/30/2024
Josh McIntosh	Pensacola	FL	32513	United States	6/30/2024
Dan Feeley	Las Vegas	NV	89107	United States	7/1/2024
Paul Markillie	Grand Blanc Township	MI	48439	United States	7/2/2024
Juan J maorinex Torres	Ciales	PR	638	United States	7/3/2024
Dan De Yo	Yorba Linda	CA	92886	United States	7/4/2024
Orva M Gullett	Marion	OH	43302-8435	United States	7/5/2024
Hassan Paria	Owatonna	MN	55060	United States	7/6/2024
Jason Barthel	Chicago	IL	60647	United States	7/6/2024
Gregg Levine	Astoria	NY	11102	United States	7/7/2024
Carl Harris	West Bend	WI	53095	United States	7/8/2024
Kt Hertfelder	Ballwin	MO	63011	United States	7/10/2024
LeeAnn Trevino	Pendleton	OR	97801	United States	7/10/2024
Sabryna-Joi King-Bell	Chicago	IL	60680	United States	7/10/2024
Heather Isaac	Vista	CA	92084	United States	7/11/2024
GERALDINE C. MITCHELL	Hyattsville	MD	20783	United States	7/11/2024
Texanna Fernandez	Parkersburg	WV	26101	United States	7/11/2024
Judith Escamilla	Flowery Branch	GA	30542	United States	7/14/2024
Divya Nagendran	Aurora	IL	60505	United States	7/15/2024
John Hutton	Winston-salem	NC	27104	United States	7/16/2024
A Kallas	Chicago	IL	60659	United States	7/17/2024
Sam Clemetsen	Greenville	SC	29601	United States	7/19/2024

Cecilia Magos	Los Angeles	CA	90011	United States	7/24/2024
Duane Campbell	Phoenix	AZ	85041	United States	7/26/2024
Catherine Travis	Phoenix	AZ	85009	United States	7/26/2024
chelsea hardy	Castro Valley	WA	98607	United States	7/29/2024
Beth Heeren	Comstock Park	MI	49321	United States	7/30/2024
Doris Kitchen	Hendersonville	NC	28739	United States	8/2/2024
James Smith	Schenectady	NY	12306	United States	8/2/2024
Jennifer Hahn	Los Angeles	CA	91335	United States	8/6/2024
Tony Lentini	Snellville	GA	30039	United States	8/9/2024
Matt James	Dallas	TX	75214	United States	8/14/2024
Melodi Gulsen	Los Angeles	CA	90066	United States	8/15/2024
Kendrick Collins	Harrisburg	PA	17112	United States	8/16/2024
gary etherton	Rochester	MN	55901	United States	8/29/2024
Gerald Pettipiece	Owatonna	MN	55060	United States	10/1/2024
Etzar Cisneros	Birmingham	AL	35206	United States	10/1/2024
Vic Vinson	Albuquerque	NM	87002	United States	10/2/2024
Elizabeth Fuljerson	Jacksonville	FL	32255	United States	10/3/2024
Scott Sorenson	Owatonna	MN	55060	United States	10/21/2024
Josephine Sanford	Faribault	MN	55021	United States	11/2/2024
Tammie Lopez-Henricksen	Owatonna	MN	55060	United States	11/7/2024
Arnold Ades	Boise	ID	83714	United States	11/20/2024
Robert Grant	Nisswa	MN	56468	United States	12/20/2024
Deb Grant	Nisswa	MN	56468	United States	12/21/2024
Shawn Smith	Owatonna	MN	55060	United States	1/8/2025
Jaime Hayden	New Richland	MN	56072	United States	1/22/2025
Mary McLaughlin	Nevada	IA	50201	United States	1/28/2025
Eileen Piccolo	Falls Church	VA	22043	United States	3/4/2025
Garrett Melich	Falls Church	VA	22043	United States	3/4/2025
Kammi Szymanski	Owatonna	MN	55060	United States	3/30/2025
Mackenzie Appwl	Janesville	MN	56048	United States	5/15/2025
Michael Spellmeyer	Owatonna	MN	55060	United States	5/25/2025
Nathaniel Pettey	Rochester	MN	55904	United States	5/26/2025
Tracy Steed	Atlanta	GA	30308	United States	5/26/2025
April Abbott	Lakeville	MN	55044	United States	5/27/2025
Nina Rentz	Princeton	MN	55371	United States	5/27/2025
Amy Morrison	Burlington	IA	52601	United States	5/27/2025
Genavive Kostuck	Lake Elmo	MN	55042	United States	5/28/2025
Sandra Kanani	Hopkins	MN	55343	United States	5/28/2025
Mari Muller	Minneapolis	MN	55408	United States	5/28/2025
Jeffrey Broussard	Owatonna	MN	55060	United States	7/5/2025
Bill Kroells	Hayward	WI	54843	United States	7/6/2025
Bonnie Johnson	Owatonna	MN	55060	United States	8/21/2025
Katelynn Miller	Owatonna	MN	55060	United States	8/21/2025
Sandee Hardy-Hagen	Owatonna	MN	55060	United States	8/21/2025
Douglas Mollison	Inver Grove Heights	MN	55077	United States	8/21/2025
Jill Hammitt	Owatonna	MN	55060	United States	8/21/2025
Diane Storm	Owatonna	MN	55060	United States	8/21/2025
Braydin Johnson	St.Paul	MN	55123	United States	8/22/2025
Mira Jovonovich	Minneapolis	MN	55044	United States	8/22/2025

Gooper Pool	Woodbury	MN	55129	United States	8/22/2025
Melissa Webb	Stillwater	MN	55082	United States	8/22/2025
Sarah Krook	Hastings	MN	55033	United States	8/22/2025
olivia stromberg	Hastings	MN	55033	United States	8/22/2025
Nancy Spears	Minneapolis	MN	55478	United States	8/22/2025
Linda Frolund	Chanhassen	MN	55317	United States	8/23/2025
Joni Eichhorst	Owatonna	MN	55060	United States	11/26/2025
Zander Augesen	Hastings	MN	55033	United States	11/26/2025
Theresa Dekker	Owatonna	MN	55060	United States	11/28/2025
Gallus Mary	Saint Paul	MN	55104	United States	11/28/2025
Tori Keck	Owatonna	MN	48234	United States	11/28/2025
Jacqueline McGregor	Owatonna	MN	55060	United States	12/10/2025
Kathie Hansen-Stratton	Owatonna	MN	55060	United States	12/19/2025
Stephanie Sorensen	Owatonna	MN	55060	United States	12/19/2025
BELLRICHARD Douglas	Owatonna	MN	55060	United States	12/20/2025
Brad Audette	Forest Lake	MN	55025	United States	12/20/2025
Mary L Schenk	Owatonna	MN	55060	United States	12/20/2025
A B	Saint Paul	CA	55104	United States	12/20/2025
Aweke Genbere	Saint Paul	MN	55102	United States	12/21/2025
Zana Hultman	Saint Paul	MN	55104	United States	12/21/2025
El Cares	Owatonna	MN	55060	United States	12/21/2025
Avrie Gonzalez	Forest City	IA	50436	United States	12/21/2025
Oliver Foster	Minneapolis	MN	55423	United States	12/21/2025
monty miller	Mankato	MN	56001	United States	12/21/2025
Nigusie Kassa	Burnsville	MN	55337	United States	12/21/2025
Mavrik Gustavson	Hopkins	MN	55305	United States	12/22/2025
Kevin Hermanson	KASOTA	MN	55060	United States	12/22/2025
MARYLYN IRRGANG	Mankato	MN	56001	United States	12/22/2025
Abe Algadi	Stewartville	MN	55976	United States	12/22/2025
Derek Graybill	Minneapolis	MN	55404	United States	12/23/2025
Jeremy Binner	Wabasha	MN	55981	United States	12/23/2025
Rahel Balcha	Saint Paul	MN	55104	United States	12/23/2025
Shannon Gruhlke	Lake City	MN	55041	United States	12/23/2025
John Hoverson	Owatonna	MN	55060	United States	12/23/2025
David Ellis	Owatonna	MN	55060	United States	12/25/2025
Paul Joswick	Watertown	MN	55388	United States	12/25/2025
Dan Aune	Saint Paul	MN	55104	United States	12/25/2025
Sue Charbonneau	Rochester	MN	55902	United States	12/25/2025
Giselle Vivero	Minneapolis	MN	55404	United States	12/26/2025
Cheryl Minx	Saint Paul	MN	55130	United States	12/26/2025
Stewart Schill	Clearwater	MN	55320	United States	12/26/2025
Sowed Darwesh	Littleton	CO	80120	United States	12/26/2025
Tina Weinkauf	North Branch	MN	55056	United States	12/26/2025
Daniel Stahn	Isanti	MN	55040	United States	12/26/2025
Richard Weaver	Stewartville	MN	55976	United States	12/26/2025
Nazik Badawi	Minneapolis	MN	55478	United States	12/26/2025
Mike McGrane	Alexandria	MN	56308	United States	12/26/2025
Ted Mitchell	Saint Paul	MN	55122	United States	12/26/2025
Anna Hansen	Burnsville	MN	55337	United States	12/26/2025

Gina Dussing	Chicago	IL	60618	United States	12/26/2025
Mary Ryan	Edina	MN	55436	United States	12/26/2025
John Brown	Rosemount	MN	55068	United States	12/26/2025
Scott Schmidt	Faribault	MN	55021	United States	12/26/2025
Justin Vigesaa	Detroit Lakes	MN	56501	United States	12/26/2025
Traci Perez	Badger	MN	56714	United States	12/27/2025
Stu Sonnee	Saint Paul	MN	55104	United States	12/27/2025
Liz Liebo	Eden Prairie	MN	55346	United States	12/27/2025
Flor Cruz	Suwanee	GA	30024	United States	12/27/2025
Mudassar Manzoor	Woodbury	MN	55129	United States	12/27/2025
Alix Gacek	Minneapolis	MN	55410	United States	12/27/2025
Chris MBZ	Minneapolis	MN	55406	United States	12/27/2025
Richard Heilman	Minneapolis	MN	55426	United States	12/27/2025
Pedro Burgos	New York	NY	10118	United States	12/27/2025
Solomon Tiruneh	Moorhead	MN	56560	United States	12/27/2025
Mike Kopp	Hoyt Lakes	MN	55750	United States	12/28/2025
Kathleen Starr	Owatonna	MN	55060	United States	12/28/2025
Eudore Jerryson Andre	Minneapolis	MN	55430	United States	12/28/2025
Kathryn Frette	Owatonna	MN	55060	United States	12/28/2025
Chelsie Hansen-Stratton	Owatonna	MN	55060	United States	12/28/2025
Colleen Ontko	Howell	MI	48843	United States	12/30/2025
Jacob Thomas	Bartlesville	OK	74006	United States	12/30/2025
LaTasha morris	Chicago	IL	60653	United States	12/30/2025
Leah Hipps	Stanley	NC	28164	United States	12/30/2025
Julia Safiejko	Roselle	IL	60172	United States	12/30/2025
Madison Busch	Washington	MO	63090	United States	12/30/2025
Teresa Strand	Owatonna	MN	55060	United States	12/30/2025
Matt Kottke	Owatonna	MN	55060	United States	12/30/2025
Jon Chevere	Albuquerque	NM	87110	United States	12/30/2025
Lillian Baier	Owatonna	MN	55060	United States	12/30/2025
Jason Bastyr	Owatonna	MN	55060	United States	12/31/2025
Kelly Neither	Wyoming	MN	55092	United States	12/31/2025
Daniel m pridie	Owatonna	MN	55060	United States	12/31/2025
Kent Orman	Saint Paul	MN	55107	United States	12/31/2025
Caitlin Terpstra	Owatonna	MN	55060	United States	12/31/2025
Garrett Fischer	Owatonna	MN	55060	United States	12/31/2025
Annie Fischer	Owatonna	MN	55060	United States	12/31/2025
Jennifer Sheehan	Owatonna	MN	55060	United States	12/31/2025
Jane Strauss	Minneapolis	MN	55406	United States	12/31/2025
Roseann Heil	Claremont	MN	55924	United States	12/31/2025
Spencer McDermott	Owatonna	MN	55060	United States	12/31/2025
Michael DeMars	Owatonna	MN	55060	United States	12/31/2025

OWATONNA & STEELE COUNTY TO REPURPOSE RESIDENTIAL STREET FOR HIGHWAY

Please help us keep our kids & neighbors safe by moving the road ½ mile east of neighborhoods

NO	NAME	ADDRESS	CITY	PHONE (OPTIONAL)	E-MAIL (OPTIONAL)
1	Douglas Dietz	536 Havana	Owatonna MN 55060	210-875-9832	
2	Janice Dietz	536 Havana	Owatonna MN 55060	210 818 479	
3	Ben Radtke	612 14th St	Owatonna MN 55060	507-475-0796	
4	Zachary Lussenden	416 Chestnut Ave	Owatonna MN 55060	507-475-0795	
5	Mary Fitko	325 Florence Ave	Owatonna MN 55060	507-456-3985	
6	Crystal Fitke	325 Florence Ave.	Owatonna MN 55060	507 456-6827	
7	Kelly Kohn	1980 WILDFLOWER DRIVE	OWATONNA MN 55060	507-456-4377	
8	Joni Kaiser	13502 SW 72nd Ave	New Richland MN 55060	5074975191	
9	Dan Dahl	1124 Linn Ave	Owatonna MN 55060	507-390-4665	
10	Rick Radtke	612 14 St NE	Owatonna MN 55060	507-456-8710	
11		230 Oakdale st.	Owatonna MN 55060	507-456-4615	
12		5224 ~~[illegible]~~ LEHAN RD.	OWATONNA MN 55060	507-456-45-89	
13		6445 Rose St	Owatonna MN 55060	507-456-6291	
14		6076 SW 18th St	Owatonna MN 55060	507-456-0417	
15	Paula Schmoll	6076 SW 18th St	Owatonna MN 55060	507-363-0073	
16	Jack Hobart	886 Willowbrook	Owatonna MN 55060	507-456-4312	
17		5023 14 W 107 Ave	Waseca MN 55060	507 456 0123	

NO	NAME	ADDRESS	CITY	PHONE (OPTIONAL)	E-MAIL (OPTIONAL)
18	DAVE ISAACSON	235 20th St N.W	Owatonna MN 55060	507-456-7556	
19	Marlene Isaacson	235 20TH ST NW	Owatonna MN 55060		
20	Julie Harriman	1924 Greenwood	Owatonna MN 55060		
21	Christin Harriman	744 Prospect St	Owatonna MN 55060		
22	Casey Erdman	1217 woodridge PL	Owatonna MN 55060		
23	Adam McDermott	800 Cardinal Dr	Owatonna MN 55060		
24	[illegible]	2030 Fieldstone Ave	Owatonna MN 55060		
25	Lucas Lithe	120 Lewis Drive	Owatonna MN 55060		
26	Tiffany Kasper	120 Lewis Drive	Owatonna MN 55060		
27	Sara Deming	217 13th St NE	Owatonna MN 55060		
28	Kevin Dillenschneider	2435 3rd Ave NE	Owatonna MN 55060		
29	Dusty Boerner	4475 SE 88th St	Owatonna MN 55060		
30	Jessica Boerner	4475 SE 88th St	Owatonna MN 55060		
31	Lucas Chiaverini	1701 10th Ave S.W.	Owatonna MN 55060		
32	[illegible]	820 Dawn Pl	Owatonna MN 55060		
33	Rose Harriman	1924 Greenwood Dr	Owatonna MN 55060		
34	Deanna Hadley	744 Prospect St.	Owatonna MN 55060		
35	Sara Deming	217 13th St NE	Owatonna MN 55060		
36	[illegible]	505 14th St SE	Owatonna MN 55060		
37	Matt Seykora	3550 St Paul Rd	Owatonna MN 55060		
38	Geneva Seykora	3550 St Paul Rd	Owatonna MN 55060		

9/16/2023

PLEASE HELP US KEEP OUR KIDS & NEIGHBORS SAFE

NO	NAME	ADDRESS	CITY	PHONE (OPTIONAL)	E-MAIL (OPTIONAL)
1	Molly Schuster	17764 7th Ave NE	Owatonna MN	55060	
2	[signature]	995 Ridge Rd.	Owatonna MN	55060	
3					
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10/7/2023

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A half-mile further east, there is an already-established north-south roadway called 34th Avenue. A north-south highway here would put a safe distance between existing neighborhoods and high-speed traffic, **ensure safety, reduce noise levels for residents and promote future growth. Previous environmental and impact studies, including MN DOT (see page 30 of 2004 Beltline Study), have also recommended 34th Avenue.** Over the past three decades, residents of Owatonna have also been recommending the use of 34th Avenue (**Pages 59-77 of the 1995 Environmental Report**). All but 1.5 miles of 34th Avenue is an existing roadway. **Building the East Side Corridor at 34th Avenue is the safest, most fiscally responsible location, and it allows for the right kind of development and growth for Owatonna.**

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Name	Address	Signature
Barb Walsh	2551 Stony Creek Dr Owatonna, MN 55060	
Mark Schultz	2551 Stony Creek Dr Owatonna, MN 55060	
Tiffany Klecker	2539 Stony Creek Dr Owatonna MN 55060	
Scott Klecker	2539 Stony Creek Dr Owatonna, MN 55060	
Tyler Firme	2575 Fox Hollow Ln Owatonna MN 55060	
Don Winter	2555 Mossy Creek Dr Owatonna, MN 55060	
Dan Connelly	2536 Mossy Creek Dr Owatonna, MN 55060	

2/3/2024

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Name	Address	Signature
Scott ~~Couch~~ Cloutier	2470 Briarwood Pl NE Owatonna, MN 55060	
Sarah Cloutier	2470 Briarwood Pl NE Owatonna MN 55060	
Mary Schwanke	2460 Briarwood Pl NE Owatonna MN 55060	
Todd Schwanke	2460 Briarwood Pl NE Owatonna MN 55060	
Kesley Buchardt	2450 Briarwood Pl NE Owatonna MN 55060	
Tyler Buchardt	2450 Briarwood Pl NE Owatonna MN 55060	
CHRIS HARKEMA	2455 BRIARWOOD PL NE Owatonna MN 55060	
Sara Harkema	2455 Briarwood Pl NE Owatonna MN 55060	
Robert SCHMIDT	2465 BRIARWOOD PL NE Owatonna, MN 55060	
JASON HOUSE	2430 BRIARWOOD PL NE	

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Name	Address	Signature
Bob Olson	2445 Timberwood Ln NE Owatonna, MN 55060	Robert Olson
Brad Olson	2417 Timberwood Lane NE Owatonna, MN 55060	Brad Olson

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Name	Address	Signature
Bob McBride	2504 Stony Creek DR Owatonna, MN 55060	Bob McBride
DAVE HISSAM	641 E. VINE Owatonna, MN 55060	Dave Hissam
Bradley Walsh	1052 Grandview Ave Owatonna, MN 55060	
Jerry Babcock	2541 Mossy Creek Owatonna MN 55060	
Renee Babcock	2541 Mossy Creek Dr Owatonna MN 55060	Renee Babcock
Ivette Torres	2547 Stony Creek Dr Owatonna, MN 55060	
Mary Butler	2559 Stony Cr. Dr. Owatonna MN 55060	

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Name	Address	Signature
La Vern Akers	2567 Stony Creek Dr. Owatonna MN 55060	
Ron Akers	2567 Stony Creek Dr Owatonna MN 55060	
Katie Todd	2570 Stony Creek Dr Owatonna MN 55060	
DAN TODD	2570 STONY CREEK DR Owatonna MN 55060	
Layne Hable	2571 Stony Creek DR Owatonna MN 55060	
Nikki Hable	2571 Stony Creek Dr Owatonna MN 55060	
Kyle Moorhead	2575 Stony Creek Dr Owatonna MN 55060	
Jordan Moorhead	2575 Stony Creek Dr. Owatonna, MN 55060	
Laurie Fisher	2583 Stony Creek Dr. Owatonna MN 55060	
Mark Fisher	2583 Stony Creek DR	

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Name	Address	Signature
Joe Sunnarborg	2591 Stony Creek Dr. Owatonna, MN 55060	
Melanie Sunnarborg	2591 Stony Creek Dr. Owatonna, MN 55060	Melanie Sunnarborg

Feb 4, 2024

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Name	Address	Signature & PHONE
Bob + Jami Krogman	2474 Timberwood Owatonna MN 55060 Ln	Jami Krogman
Marlys Knopik	2534 Stony Creek Dr Owatonna MN 55060	Marlys Knopik
Dan Bauer	2410 Fox Hollow Ln Owatonna MN 55060	612-237-9715
Melissa Walter	2433 Timberwood Ln NE Owatonna MN 55060	Melissa Walter 651-353-246
Molly Henriksen	2434 Timberwood Ln NE Owatonna MN 55060	Molly Henriksen 507 213 0896
Sara R Frieden	2442 Timberwood Ln NE Owatonna MN 55060	Sara R Frieden 319-310-1704

2/5/2024

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Gerald F Pettys	2415 Mossy Cr Dr. Owatonna MN 55060	Gerald F Pettys
Roger Rockwell	2435 Mossy Cr. Dr. Owatonna MN 55060	Roger Rockwell
Phil Nelson	2455 Mossy Cr Drive Owatonna MN 55060	Phillip Nelson
Mary Lund	2485 Mossy Creek Owatonna MN 55060	Mary Lund
Mike McDonagh	2495 Mossy Creek Dr Owatonna MN 55060	McDonagh
Teresa Klecker	2501 Mossy Creek Dr Owatonna MN 55060	Teresa Klecker
RaNaye Kruse	2511 Mossy Ck. Dr. Owatonna MN 55060	RaNaye Kruse
Avri Lawson	7515 Mossy Creek Dr. Owatonna MN 55060	Avri Lawson

2/4/2024

Owatonna & Steele County to repurpose Residential Street for Highway

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Name	Address	Signature
Anastasia Garza	2435 Stony Creek Dr. Owatonna MN 55060	
Anthony Garza	2435 Stony Creek Dr. Owatonna MN 55060	
Brian Wagamon	2430 Stony Creek Dr Owatonna MN 55060	
Megan Wagamon	2430 Stony Creek Dr Owatonna MN 55060	
Rita Anderson	2455 Stony Creek Dr Owatonna MN 55060	
Bob Anderson	2455 Stony Creek Dr Owatonna, MN 55060	

2/8/2024

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Name	Address	Signature
Jayne Jacobson	2581 Mossy Creek Owatonna MN 55060	Jayne Jacobson
Gary Boyd	2575 mossy creek Owatonna, MN 55060	Gary Boyd

2/4/2024

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Name	Address	Signature
James + Connie Kalis	780 County View Ave Owatonna MN 55060	
Connie Kalis	78 County View Owatonna, MN 55060	
[illegible]	640 County View Ave NE Owatonna MN 55060	
Cassie Tevpe	640 County View Ave NE Owatonna MN 55060	
Jason Tavano	590 County View Ave NE Owatonna, MN 55060	
Brandice Schoenbauer	2460 Fox Holw Ln Owatonna MN 55060	

2/3/2024

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Name	Address	Signature
Stephanie House	2430 BRIARWOOD PL NE Owatonna MN 55060	

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Name	Address	Signature
Tim McCauley	2410 Mossy Creek Dr Owatonna MN 55060	
Corey Hart	2460 Mossy Creek Dr. Owatonna MN 55060	
Kris Hart	2460 Mossy Creek Dr Owatonna MN 55060	
AL FREED	2521 Mossy Creek Dr Owatonna, MN 55060	
D. S. Varra	2505 Mossy Creek Dr Owatonna MN 55060	
Jeanette Sanford	2449 Timberwood Lane NW Owatonna, MN 55060	

3/12/24

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Gale Jorgenson	249 E. Main St. Owatonna, MN 55060	

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Name	Address	Signature
Jenelle Gustafson	2264 Hill DR	
Dale Bergam	2111 Hill Dr	
Kriana Finholdt	2301 Hill Dr.	
Elaine Merdsty	2621 Walker Ave.	
Robert Brandt	2600 Walk Dr.	
Nate Finholdt	2301 Hill DR	
Annette Balzer	2524 Walker Drive	
Mark Rahrick	2634 Walker Drive	
Renée Eberhart (trustee)	2189 Hill Drive	

Comment #146

Purpose & Need Collapse
EAW Comment #25

Date: December 27, 2025

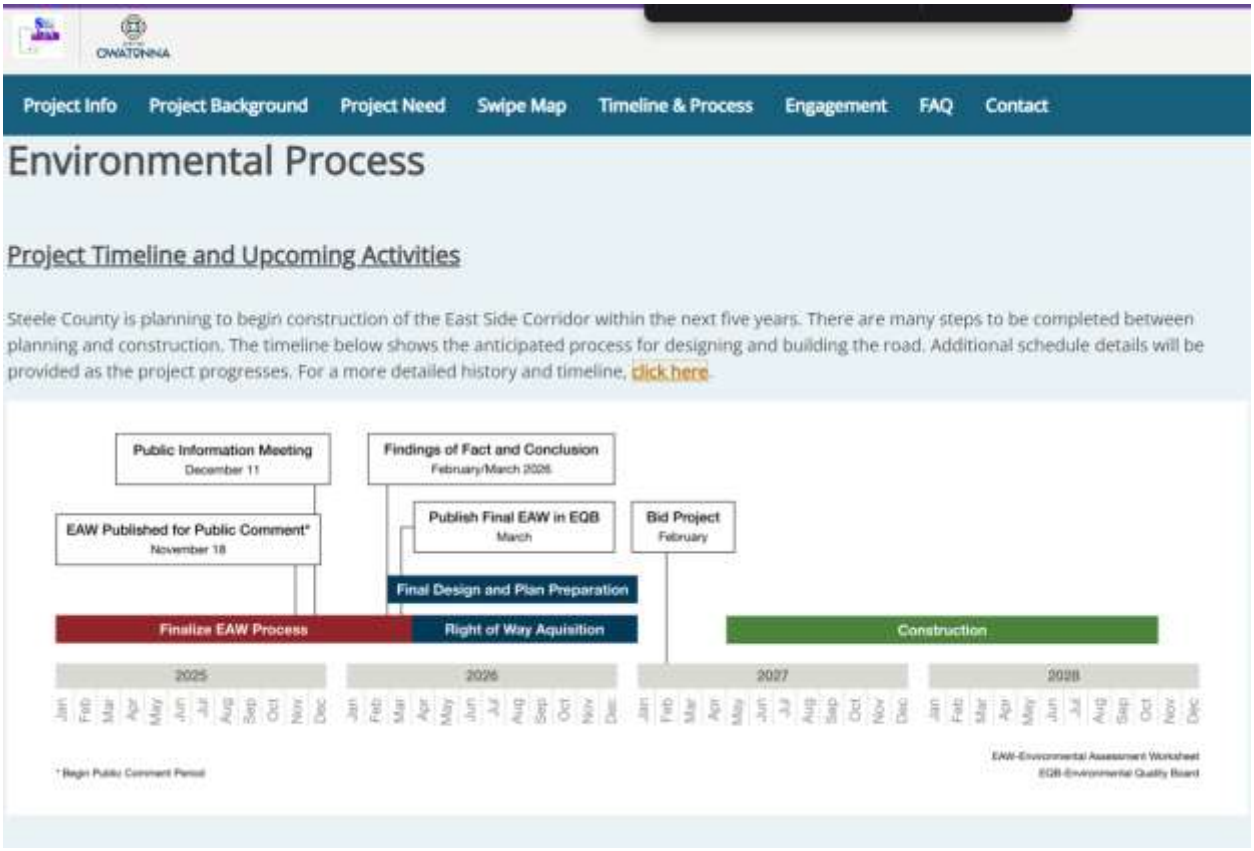
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Purpose and Need Collapse: Lack of a Demonstrated Transportation Problem

I am submitting this comment to document **inconsistencies in the project schedule presented to the public** for the East Side Corridor (ESC) and to request clarification regarding **the source and authority of these timelines**.

During my review of public-facing materials, I identified **three different presentations of the same project schedule information**, each appearing in a different context and format. These materials present **materially different implications** about when final design, right-of-way acquisition, and construction are expected to occur, and whether those steps are contingent on the outcome of environmental review.

Screenshot 1 – Project Website



This screenshot is taken from the WSB-hosted East Side Corridor timeline page. Immediately above the project timeline, the following statement appears:

*"Steele County is planning to begin construction of the East Side Corridor **within the next five years**. There are many steps to be completed between planning and construction. The timeline below shows the anticipated process for designing and building the road."*

Directly below this statement, the timeline presents:

- Completion of the EAW and EIS need determination by early 2026,
- **Final design and right-of-way acquisition beginning January 2026**, and
- **Construction scheduled from May 2027 through November 2028**.

When read together, this narrative language and timeline communicate that construction is not merely a possibility, but an **anticipated and planned outcome**, with a defined sequence leading directly from environmental review into design, right-of-way acquisition, and construction.

Screenshot 2 – Alternate Public-Facing Schedule Presentation

Proposed Schedule

2025/early 2026

- **Finalize the State of Minnesota Environmental Assessment Worksheet (EAW) Process:**
  - **November 18, 2025:** Public comment period opens and EAW published in the Environmental Quality Board (EQB) Monitor
  - **November 25, 2025:** EAW republished in the EQB Monitor to reflect extended public comment period
  - **December 11, 2025:** Public Open House
  - **December 31, 2025:** Public comment period closes
  - **January 2 – February 1, 2026:** Findings of Fact and Conclusion (FOFC)/Environmental Impact Statement (EIS) Need Determination Process
    - **January 27, 2026:** County Board Resolution
    - **February 17, 2026:** FOFC published in the EQB Monitor

January, 2026 - February, 2027

- Final design and plan preparation
- Right of Way (ROW) Acquisition

Construction

- May, 2027 – November, 2028

This screenshot presents the same project phases but in a different format, creating ambiguity as to whether design and ROW acquisition are conditional or assumed outcomes. While the dates overlap with the ArcGIS Hub timeline, the presentation lacks clarity regarding decision points and reinforces the perception that the project is already moving forward beyond environmental review.

Screenshot 3 – County Website: Future Projects & Studies

Select the project you are interested in to see current information.

East Side Corridor - City of Owatonna, Owatonna Township & Clinton Falls Township

Subscribe to email updates: Click to subscribe

Description: The project will construct a new north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). Traffic currently has no direct route for traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999-2000, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part CSAH 43 to the east. While CSAH 43 will have connections to US 14, is part of the Owatonna Beltline, and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street SE. This proposed route will provide those needed connections and alleviate downtown traffic.

Project Schedule (updated January 2025):
2022-2025 Environmental Study and Preliminary Design in progress (anticipated completion Fall 2025)
2025-2026 Final Design & right of way acquisition
2026-2027 Construction in stages

Public Information Meetings:

Public Information Meeting #1 was held July 21st, 2022 (reviewed previous project studies and alignments)
Public Information Meeting #2 was held May 31, 2023 (presented preferred alternative)
Public Information Meeting #3 anticipated Spring 2025 (will present environmental documents and collect public comment)

East Side Corridor – Public Comment Period & Open House

The official public comment period for the East Side Corridor Project is now open. Community members are invited to review the Environmental Assessment Worksheet (EAW) and share feedback through December 31.

Please join us for an open house to learn more about the project and submit your public comment in person:

- Date: Thursday, December 11
- Time: 4:30 – 6:30 p.m.
- Location: Council Chambers, Owatonna City Hall, 540 West Hills Circle, Owatonna, MN 55060

You can also submit your comment online until December 31.

- View the full EAW here (link)
- Submit your comment online here (link)

For questions or assistance with the comment process, please email Info@eastsidecorridor.com.

Public Comments open from November 18 to December 31, 2025
Posted November 18, 2025
The official public comment period for the East Side Corridor Study is now open!
From November 18 to December 31, you can review the Environmental Assessment Worksheet (EAW) and submit your comments on the document here (link).
This is an important step in the environmental review process that helps inform project decisions. We encourage you to participate in this important process.

Additional public information meetings are planned in the future during the final design process. Watch here for updates or sign up for our email updates above.

More information:
Additional information about the project can be found at the project webpage at www.eastsidecorridor.com .

Map of Corridor Map showing the general location of preferred corridor selected in May 2023 and then reselected again in October 2024. Actual alignment or corridor location subject to change, pending results of an updated Environmental Study and preliminary design in progress.

Official Map Official Map approved by the County Board and recorded in 2000 designating an alignment for the corridor. Actual alignment or corridor subject to change, pending results of an updated Environmental Study and preliminary design in progress.

This version of the schedule appears in a County context and frames the East Side Corridor as still subject to environmental review and future decisions. This presentation contrasts with the WSB-hosted timeline by implying that final design and construction are not yet committed actions.

Why This Matters

The public-facing materials for the East Side Corridor present **inconsistent and conflicting signals** regarding whether final design, right-of-way acquisition, and construction are contingent on the outcome of environmental review. On the WSB-hosted ArcGIS Hub page, forward-committing narrative language (“planning to begin construction within the next five years”) appears immediately above a detailed timeline that sequences environmental review directly into final design, right-of-way

acquisition, and construction. Read together, these elements convey that construction is an anticipated outcome rather than a contingent decision dependent on the results of environmental review.

At the same time, other public-facing materials present the same project phases in formats that obscure decision points or imply continued evaluation, while County website materials frame the East Side Corridor as still subject to environmental review and future decisions. When viewed collectively, these differing presentations communicate **different levels of certainty and commitment** for the same project. I don't know if construction is beginning tomorrow, in a year, or sometime in the future.

Based on the public-facing materials reviewed, I cannot determine whether construction is anticipated to begin imminently, within a year, or at some later point in the future, or whether construction is fully contingent on the outcome of environmental review.

Under MEPA, the public is entitled to a **clear, consistent, and accurate project description**. When project materials simultaneously hedge and commit—depending on the source—meaningful public participation is undermined, and the viability of alternatives, including avoidance, becomes unclear. This lack of clarity raises concerns about predetermination and reinforces the need for transparency regarding whether final design, right-of-way acquisition, and construction are truly contingent on the outcome of environmental review.

Accordingly, clarification is required regarding the status of final design, right-of-way acquisition, and construction, and whether these actions are contingent on the outcome of environmental review.

Request for Clarification

I request that the Responsible Governmental Unit clarify, on the record:

1. Which project schedule is authoritative;
2. Whether final design and right-of-way acquisition are contingent on the outcome of the environmental review;
3. The role of the consultant in preparing and publishing public-facing timelines; and
4. Whether any steps toward final design or right-of-way acquisition are anticipated prior to completion of environmental review.

These inconsistencies further reinforce the need for a **full, independent Environmental Impact Statement** to ensure transparency, consistency, and public confidence in the decision-making process.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #147

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Pattern of Closed-Door Decision-Making, Chilling of Public Participation, and Fatal Procedural Defects

Beginning on January 31, 2025, I made multiple good-faith efforts to obtain basic information about the Joint County/City Transportation Committee (JTC), including its meeting schedule and the availability of meeting minutes. These inquiries were prompted by references to the JTC in public board materials and internal correspondence indicating that the committee played a role in shaping decisions related to the East Side Corridor.

Despite these efforts, I was unable to locate any publicly posted schedule, agendas, or minutes for the Joint Transportation Committee. When I reached out to County staff seeking this information, I was informed that Steele County does not maintain JTC meeting minutes and was unable or unwilling to provide information regarding when the committee meets. These responses were concerning, given that the JTC is a formally constituted intergovernmental body with appointed commissioners that discusses public transportation matters affecting residents.

In response to these inquiries, I received a directive from the County Attorney on February 4, 2025 stating that, “from this point forward,” all requests for documents **and questions regarding the East Side Corridor** were to be directed exclusively to the County Attorney and the County Administrator, that such requests would be tracked, that no timeframe for response would be provided, and that the County was not required to answer questions. This response was issued in reaction to a routine request for what should have been public facing information and had a chilling effect on my participation. Rather than being directed to publicly available information or assisted in understanding how to observe the committee’s work, I was discouraged from ordinary communication and left with the reasonable impression that further engagement would be treated as adversarial or unwelcome.

On February 11, 2025, following a Steele County Commissioner meeting, I asked a Commissioner on this committee how I could obtain information about the Joint Transportation Committee meeting so that I could attend. I was seated back in a chair and asked calmly and respectfully.

The Commissioner became visibly upset, clenched his teeth, closed his fists, and leaned over me while responding. He told me that I could not attend the meeting because it was “not open to the public.” This response was alarming both because of the physical posture and because it confirmed that a committee discussing substantive transportation decisions was operating without public access.

When I attempted to understand the basis for this exclusion, the County Administrator intervened and took over the interaction. From that point forward, Joint Transportation Committee meetings began occurring without public notice and behind locked doors, with no published schedules, agendas, or publicly available minutes. Subsequently all other committee meeting were locked from the public too.

This sequence of events had a clear chilling effect. I was not attempting to disrupt or confront anyone; I was seeking basic information about how to observe or participate in a meeting that was shaping decisions directly affecting my neighborhood and the East Side Corridor project. Being told that such meetings were not open to the public—and then observing increased secrecy afterward—created a reasonable fear that further attempts to engage would be met with hostility or retaliation, and that is what happened.

In addition, lawful requests for information related to the Joint Transportation Committee—including meeting schedules, minutes, and historical data—were denied despite clear evidence that such data exists. These denials occurred even though a prior Administrative Law Judge ruling had already determined that Steele County improperly rejected and delayed valid data requests, this one included. This can be seen on page 22 of the November 24, 2025 ruling here www.OwatonnaEastSideCorridor.com/downloads/FindindsofFactConclusionsofLawandORderCAH22-0305-40882.pdf. The continued refusal to provide access to information necessary to understand or observe decision-making further impaired my ability, and the public's ability, to meaningfully participate.

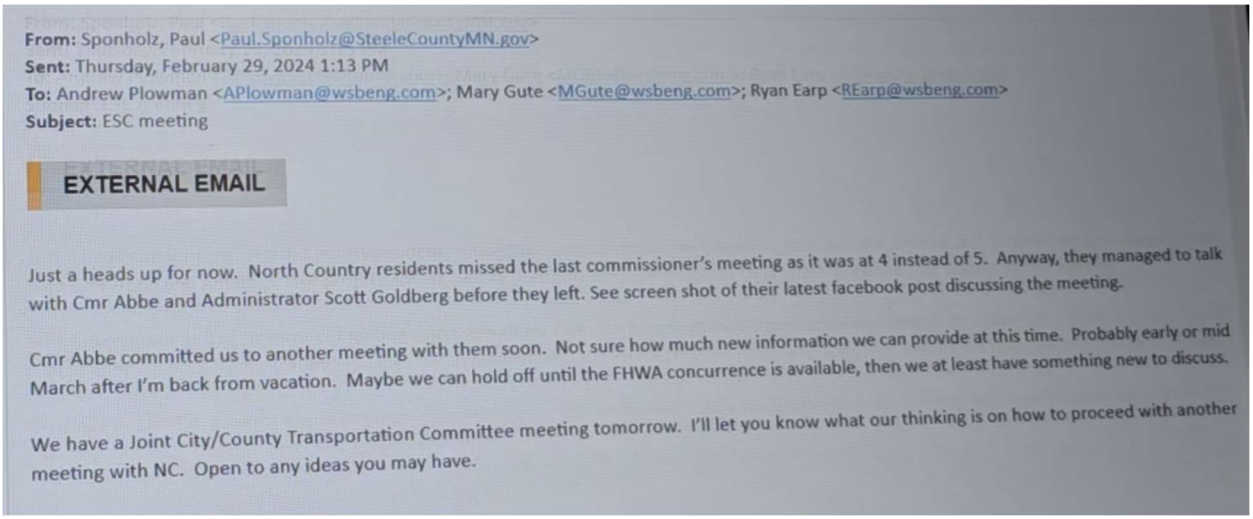
MEPA requires more than the opportunity to submit written comments after decisions have been shaped. It requires meaningful, good-faith public participation throughout the decision-making process. When residents are denied access to meetings where alternatives, mitigation, and funding decisions are discussed; when information is withheld; and when communication is restricted through intimidating directives, public participation is substantially impaired.

These events demonstrate that decisions regarding the East Side Corridor were being made or finalized outside of public view and prior to, or independent of, environmental review. This constitutes predetermination and represents a fatal procedural defect that cannot be cured through revisions to the Environmental Assessment Worksheet or additional comment opportunities.

For these reasons, an Environmental Assessment Worksheet is inadequate as a matter of law. Preparation of a full Environmental Impact Statement (EIS) is required to remedy these procedural failures, evaluate reasonable alternatives and mitigation, and restore meaningful public participation before any further project decisions are made.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

***Public data records while in the County's possession were deleted or destroy, preventing me from obtaining copies of public data. This submission relies on the best available evidence, including screen captures from video recordings, with verbatim transcriptions provided where text is difficult to read.*



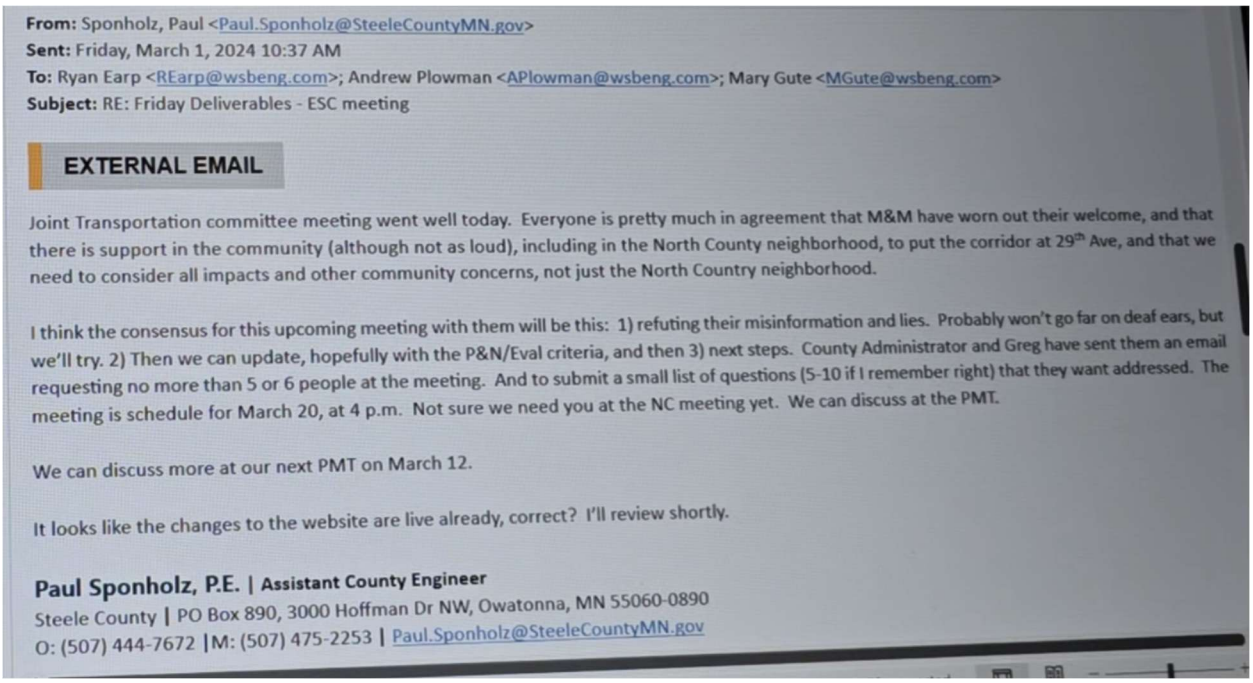
From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, February 29, 2024 1:13 PM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>; Ryan Earp <REarp@wsbeng.com>
Subject: ESC meeting

EXTERNAL EMAIL

Just a heads up for now. North Country residents missed the last commissioner's meeting as it was at 4 instead of 5. Anyway, they managed to talk with Cmr Abbe and Administrator Scott Goldberg before they left. See screen shot of their latest facebook post discussing the meeting.

Cmr Abbe committed us to another meeting with them soon. Not sure how much new information we can provide at this time. Probably early or mid March after I'm back from vacation. Maybe we can hold off until the FHWA concurrence is available, then we at least have something new to discuss.

We have a Joint City/County Transportation Committee meeting tomorrow. I'll let you know what our thinking is on how to proceed with another meeting with NC. Open to any ideas you may have.



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, March 1, 2024 10:37 AM
To: Ryan Earp <REarp@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Friday Deliverables - ESC meeting

EXTERNAL EMAIL

Joint Transportation committee meeting went well today. Everyone is pretty much in agreement that M&M have worn out their welcome, and that there is support in the community (although not as loud), including in the North County neighborhood, to put the corridor at 29th Ave, and that we need to consider all impacts and other community concerns, not just the North Country neighborhood.

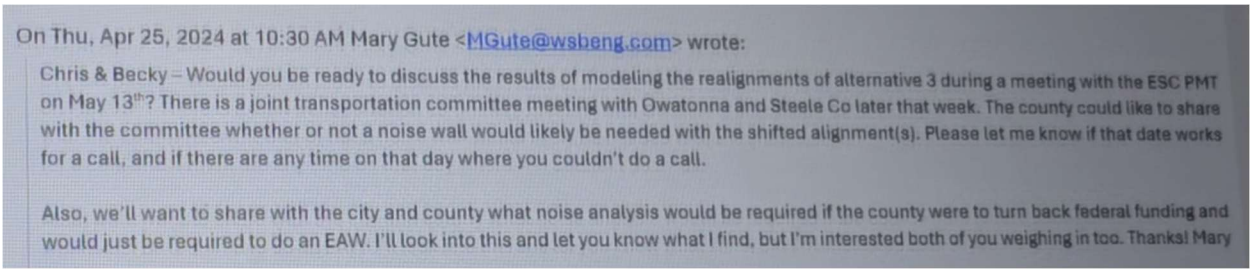
I think the consensus for this upcoming meeting with them will be this: 1) refuting their misinformation and lies. Probably won't go far on deaf ears, but we'll try. 2) Then we can update, hopefully with the P&N/Eval criteria, and then 3) next steps. County Administrator and Greg have sent them an email requesting no more than 5 or 6 people at the meeting. And to submit a small list of questions (5-10 if I remember right) that they want addressed. The meeting is schedule for March 20, at 4 p.m. Not sure we need you at the NC meeting yet. We can discuss at the PMT.

We can discuss more at our next PMT on March 12.

It looks like the changes to the website are live already, correct? I'll review shortly.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

Ironcally the two ESC advocate's names also both start with M.

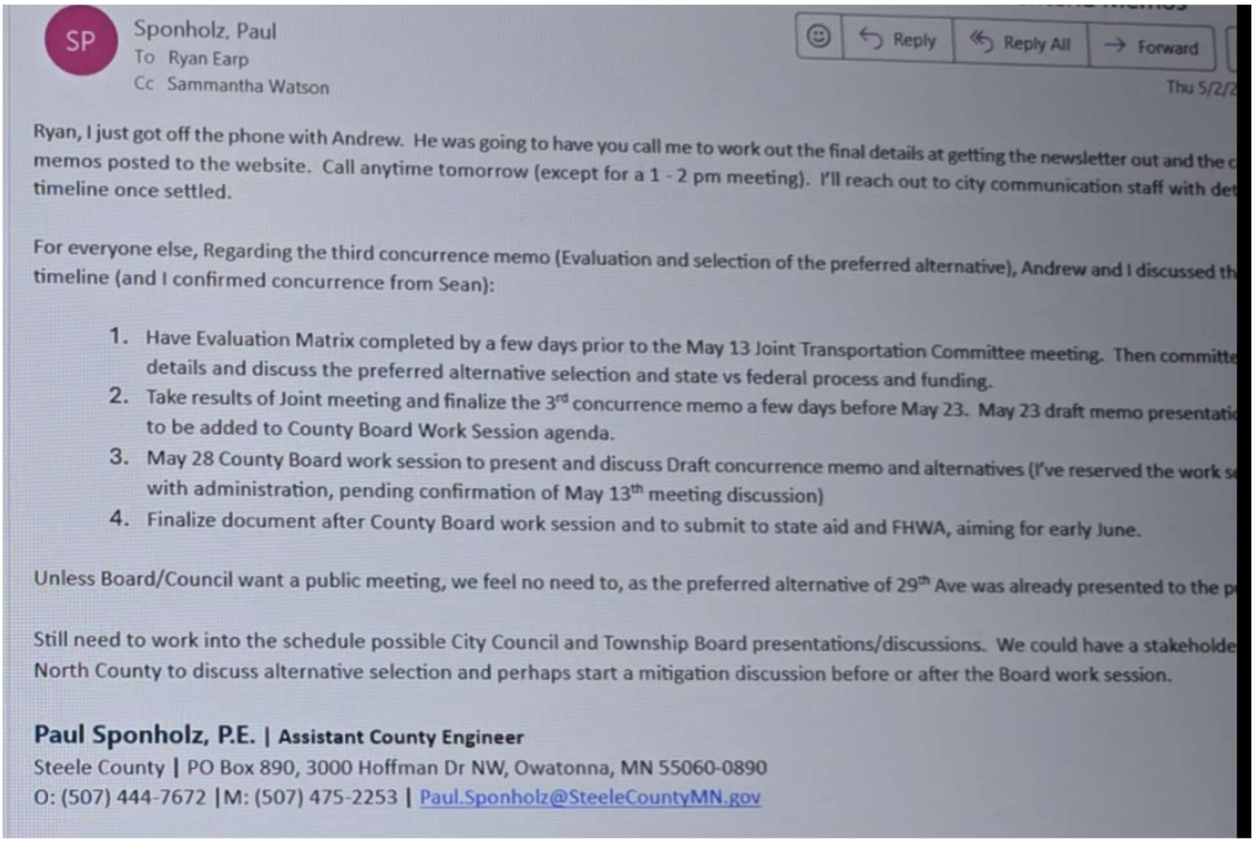

On Thu, Apr 25, 2024 at 10:30 AM Mary Gute <MGute@wsbeng.com> wrote:

Chris & Becky – Would you be ready to discuss the results of modeling the realignments of alternative 3 during a meeting with the ESC PMT on May 13th? There is a joint transportation committee meeting with Owatonna and Steele Co later that week. The county could like to share with the committee whether or not a noise wall would likely be needed with the shifted alignment(s). Please let me know if that date works for a call, and if there are any time on that day where you couldn't do a call.

Also, we'll want to share with the city and county what noise analysis would be required if the county were to turn back federal funding and would just be required to do an EAW. I'll look into this and let you know what I find, but I'm interested both of you weighing in too. Thanks! Mary

On Thu, April 25, 2024 at 10:30 AM Mary Gute <email> wrote:
Chris & Becky – Would you be ready to discuss the results of modeling the realignments of alternative 3 during a meeting with ESC PMT on May 13th? There is a joint transportation committee meeting with Owatonna and Steele Co late that week. The county could like to share with the committee whether or not a noise wall would likely be needed with the shifted alignment(s). Please let me know if that date works for a call, and if there are any time on that day where you couldn't do a call.

Also, we'll want to share with the city and county what noise analysis would be required if the county were to turn back federal funding and would just be required to do an EAW. I'll look into this and let you know what I find, but I'm interested both of you weighing in too. Thanks! Mary


SP

Sponholz, Paul
To Ryan Earp
Cc Sammantha Watson

Reply | Reply All | Forward

Thu 5/2/2

Ryan, I just got off the phone with Andrew. He was going to have you call me to work out the final details at getting the newsletter out and the c memos posted to the website. Call anytime tomorrow (except for a 1 - 2 pm meeting). I'll reach out to city communication staff with det timeline once settled.

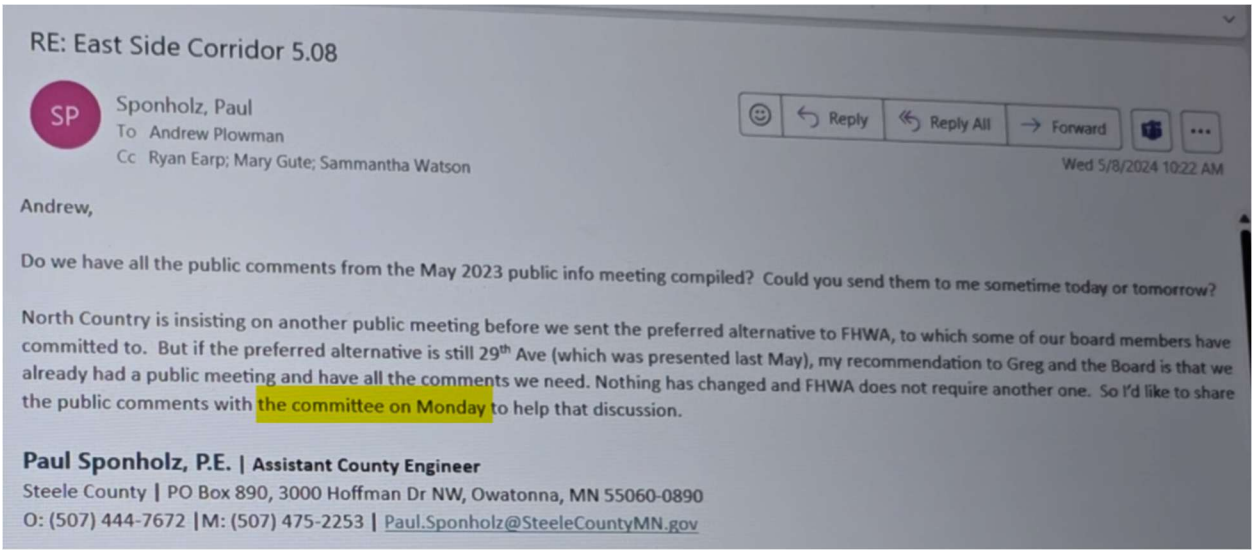
For everyone else, Regarding the third concurrence memo (Evaluation and selection of the preferred alternative), Andrew and I discussed th timeline (and I confirmed concurrence from Sean):

1. Have Evaluation Matrix completed by a few days prior to the May 13 Joint Transportation Committee meeting. Then committe details and discuss the preferred alternative selection and state vs federal process and funding.
2. Take results of Joint meeting and finalize the 3rd concurrence memo a few days before May 23. May 23 draft memo presentati to be added to County Board Work Session agenda.
3. May 28 County Board work session to present and discuss Draft concurrence memo and alternatives (I've reserved the work s with administration, pending confirmation of May 13th meeting discussion)
4. Finalize document after County Board work session and to submit to state aid and FHWA, aiming for early June.

Unless Board/Council want a public meeting, we feel no need to, as the preferred alternative of 29th Ave was already presented to the p

Still need to work into the schedule possible City Council and Township Board presentations/discussions. We could have a stakeholde North County to discuss alternative selection and perhaps start a mitigation discussion before or after the Board work session.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



RE: East Side Corridor 5.08

SP Sponholz, Paul
To Andrew Plowman
Cc Ryan Earp; Mary Gute; Sammantha Watson

Reply | Reply All | Forward

Wed 5/8/2024 10:22 AM

Andrew,

Do we have all the public comments from the May 2023 public info meeting compiled? Could you send them to me sometime today or tomorrow?

North Country is insisting on another public meeting before we sent the preferred alternative to FHWA, to which some of our board members have committed to. But if the preferred alternative is still 29th Ave (which was presented last May), my recommendation to Greg and the Board is that we already had a public meeting and have all the comments we need. Nothing has changed and FHWA does not require another one. So I'd like to share the public comments with the committee on Monday to help that discussion.

Paul Sponholz, P.E. | Assistant County Engineer
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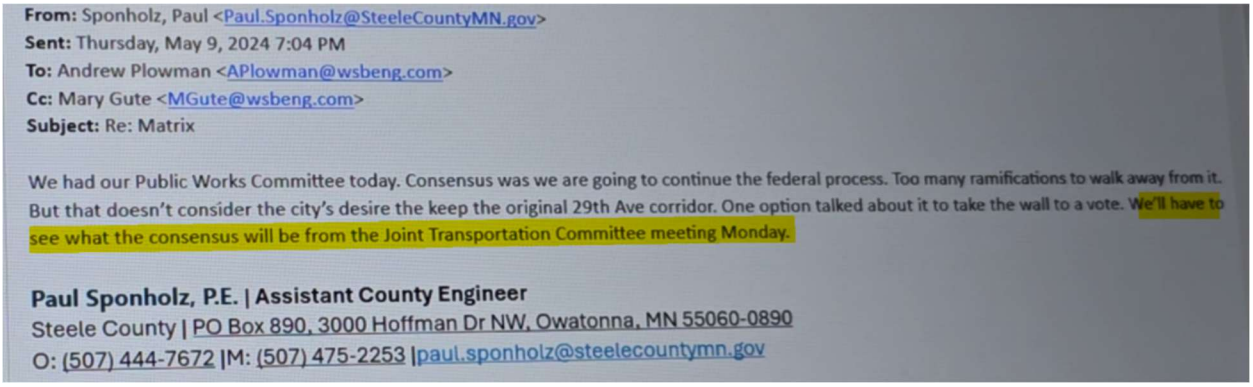
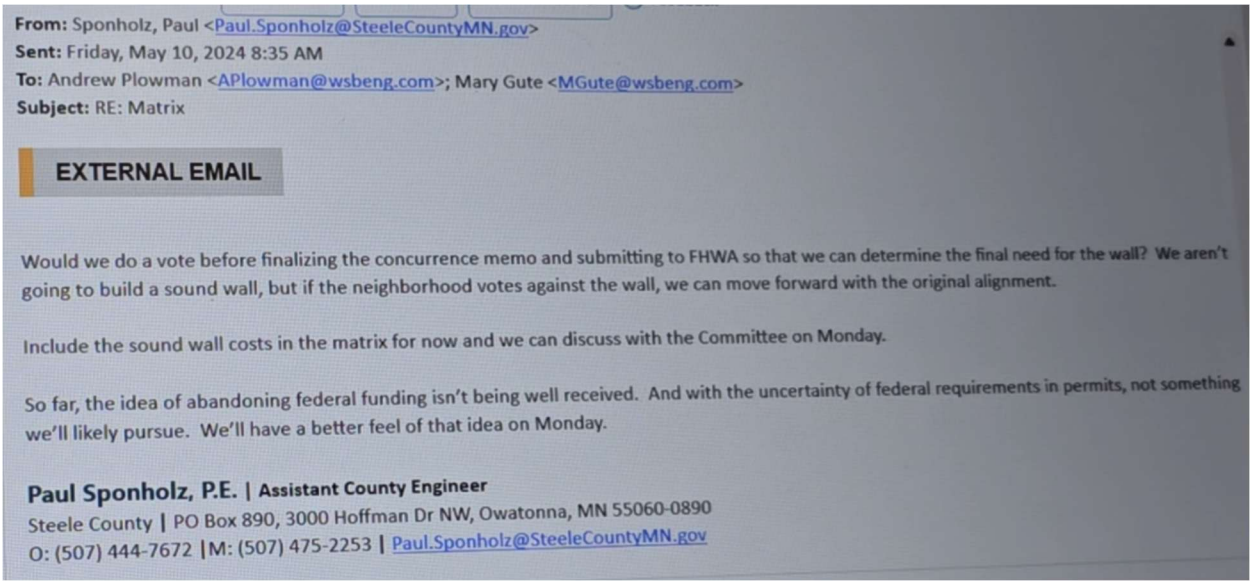
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, May 9, 2024 7:04 PM
To: Andrew Plowman <APlowman@wsbeng.com>
Cc: Mary Gute <MGute@wsbeng.com>
Subject: Re: Matrix

We had our Public Works Committee today. Consensus was we are going to continue the federal process. Too many ramifications to walk away from it. But that doesn't consider the city's desire the keep the original 29th Ave corridor. One option talked about it to take the wall to a vote. We'll have to see what the consensus will be from the Joint Transportation Committee meeting Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 |paul.sponholz@steelecountymn.gov



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

EXTERNAL EMAIL

Would we do a vote before finalizing the concurrence memo and submitting to FHWA so that we can determine the final need for the wall? We aren't going to build a sound wall, but if the neighborhood votes against the wall, we can move forward with the original alignment.

Include the sound wall costs in the matrix for now and we can discuss with the Committee on Monday.

So far, the idea of abandoning federal funding isn't being well received. And with the uncertainty of federal requirements in permits, not something we'll likely pursue. We'll have a better feel of that idea on Monday.

Paul Sponholz, P.E. | Assistant County Engineer
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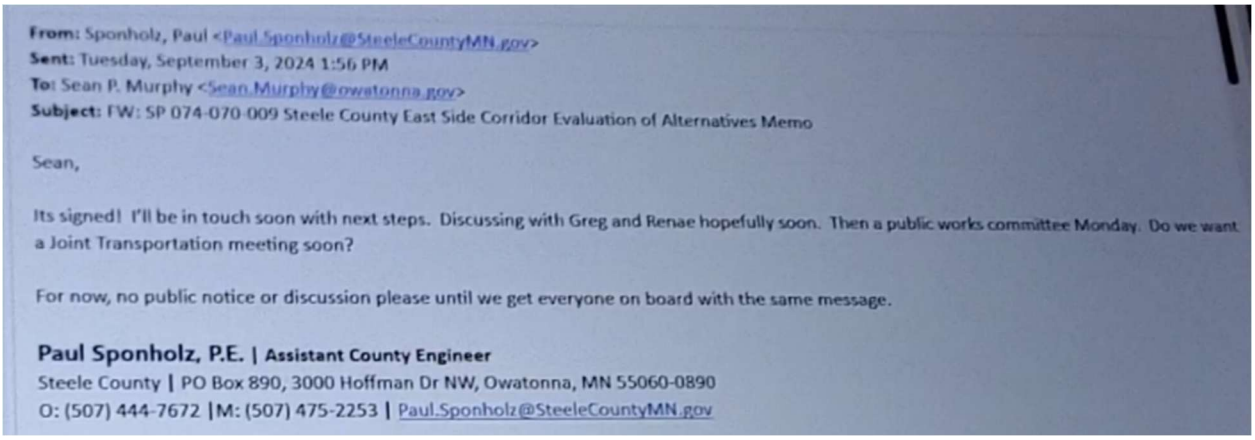

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Tuesday, September 3, 2024 1:56 PM
To: Sean P. Murphy <Sean.Murphy@owatonna.gov>
Subject: FW: SP 074-070-009 Steele County East Side Corridor Evaluation of Alternatives Memo

Sean,

Its signed! I'll be in touch soon with next steps. Discussing with Greg and Renae hopefully soon. Then a public works committee Monday. Do we want a Joint Transportation meeting soon?

For now, no public notice or discussion please until we get everyone on board with the same message.

Paul Sponholz, P.E. | Assistant County Engineer
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Board/Commission Committee	Council Representation 2025
Economic Development Authority	Dave Burbank, Dan Boeke and Doug Voss
Housing Redevelopment Authority	Nate Dotson
Owatonna Area Business Development Center	Brent Svenby & Dan Boeke
Joint Powers Board – 911 Board	Dave Burbank and Nate Dotson
Joint County/City Transportation Committee	Council President & Vice-President: Kevin Raney & Doug Voss
City/OPU Joint Committee	Dan Boeke & Nate Dotson
City/County/School/OPU Joint Task Force	Council President & Vice-President: Kevin Raney & Doug Voss
Dog Hearing Panel	Dan Boeke, Doug Voss, Kevin Raney and Brent Svenby
Executive Committee	Council President, Vice-President and Council Member at Large: Kevin Raney, Doug Voss, and Dan Boeke
Facilities Steering Committee	Dan Boeke, Doug Voss, and Don McCann

2025 STEELE COUNTY BOARD COMMITTEE APPOINTMENTS (01/01/2025)

2025 Chair: James Brady 2025 Vice Chair: John Glynn

Internal / Policy Committees

Internal Central Services Committee
James Brady, Chair (Board Chair)
John Glynn, Member (Board Vice-Chair)
Joshua Prokopec, Alternate

Land Use/Records Committee
John Glynn, Chair
Jim Abbe, Member
James Brady, Alternate

Property & Maintenance Committee
Jim Abbe, Chair
James Brady, Member
Greg Krueger, Alternate

Public Safety & Health Committee
Joshua Prokopec, Chair
Greg Krueger, Member
Jim Abbe, Alternate

Public Works Committee
Greg Krueger, Chair
Joshua Prokopec, Member
John Glynn, Alternate

Board of Equalization
All Commissioners

Joint Powers, Advisory Board, Regional Representation

Alliance for Greater Equity
Greg Krueger, Member
Jim Abbe, Alternate

Cannon River 1W1P Joint Policy Committee
Joshua Prokopec, Member
James Brady, Alternate

Cannon River Watershed Joint Powers Board
Joshua Prokopec, Member
James Brady, Alternate

Children's Mental Health Collaborative
James Brady, Member
Greg Krueger, Member
Jim Abbe, Alternate

Community Corrections Advisory Board
John Glynn, Member
Greg Krueger, Alternate

Community Health Board (Dodge/Steele)
John Glynn, Member
Jim Abbe, Member
Greg Krueger, Member
Joshua Prokopec, Alternate

Counties Providing Technology
Jim Abbe, Delegate
John Glynn, Alternate

Criminal Justice Committee
Greg Krueger, Member
Joshua Prokopec, Alternate

East Central Regional Juvenile Center
Jim Abbe, Member
John Glynn, Alternate

Economic Development Authority
Jim Abbe, Member
Greg Krueger, Alternate

Extension Committee
James Brady, Member
John Glynn, Member
Jim Abbe, Alternate

Hope Drainage
James Brady, Member
John Glynn, Alternate

Joint Powers, Advisory Board, Regional Representation

Intergovernmental Committee
All Commissioners

Intergovernmental Joint Agency Task Force
Jim Abbe, Member
James Brady, Member
Greg Krueger, Alternate

Intergovernmental Joint Transportation Committee
Jim Brady, Member
Greg Krueger, Member
John Glynn, Alternate

Judicial Ditch 1, 6, 24
Jim Abbe, Member
John Glynn, Member
Joshua Prokopec, Member

Judicial Ditch 2
John Glynn, Member
James Brady, Member
Jim Abbe, Member

Judicial Ditch 5
James Brady, Member
John Glynn, Member
Greg Krueger, Member

Judicial Ditch 7, 10, 11, 12, 19, 23
James Brady, Member
John Glynn, Member

Law Library
Jim Abbe, Member
Greg Krueger, Alternate

Local Housing Trust Fund
Greg Krueger, Member
Joshua Prokopec, Alternate

MNPrairie County Alliance – All Commissioner
All Commissioners

MNPrairie County Alliance – Board
Jim Abbe, Member
Greg Krueger, Member
James Brady, Alternate

MNPrairie County Alliance - Finance
Greg Krueger, Member
Jim Abbe, Alternate
Finance Director, Member
Administrator, Alternate

MNPrairie County Alliance - Personnel
Jim Abbe, Member
Greg Krueger, Alternate

Multi-County Solid Waste Committee
Jim Abbe, Member
Joshua Prokopec, Alternate

Planning Commission Liaison
James Brady, Member
John Glynn, Alternate

Recorder's Compliance Fund Committee
John Glynn (Land Use/Record Chair)
Jim Abbe, Alternate

Regional Railroad Authority
All Commissioners

Rice-Steele 911 Dispatch Joint Powers Board
James Brady, Member
Jim Abbe, Member
Joshua Prokopec, Alternate

SE MN Comm Action Agency (SEMCAC)
Joshua Prokopec, Member
Greg Krueger, Alternate

SE MN Emergency Communications Board
Greg Krueger, Member
Joshua Prokopec, Alternate

Joint Powers, Advisory Board, Regional Representation

SE MN Emergency Medical Services
Joshua Prokopec, Member
Jim Abbe, Alternate

SE MN Recyclers Exchange (SEMREX)
John Glynn, Member
Joshua Prokopec, Alternate

SMART Transit Advisory Board
Greg Krueger, Member
James Brady, Alternate

Soil & Water Conservation District Liaison
James Brady, Member
John Glynn, Alternate

South Central Human Relations Center
James Brady, Member
Joshua Prokopec, Member
Greg Krueger, Alternate

South Country Health Alliance
Greg Krueger, Member
Jim Abbe, Alternate

Southern MN Tourism
Jim Abbe, Member
John Glynn, Alternate

Southern MN Association of Regional Trails
Greg Krueger, Member
Jim Abbe, Alternate

Steele County Historical Society Liaison
John Glynn, Member
Greg Krueger, Alternate

Steele County Water Planning Committee
All Commissioners

Steele County Weed Management Association
James Brady, Member
John Glynn, Alternate

Steele-Waseca Drug Court
Joshua Prokopec, Member
James Brady, Alternate

U.S. Highway 14 Partnership
All Commissioners

Workforce Development Board
Joshua Prokopec, Member
Greg Krueger, Alternate

Zumbro River Watershed Partnership
James Brady, Member
John Glynn, Alternate

State / National

Association of Minnesota Counties (AMC)
All Commissioners

AMC Policy Committees
Environ. & Natural Resources: John Glynn
General Government: Jim Abbe
Health & Human Services: Greg Krueger
Public Safety: Joshua Prokopec
Transportation & Infrastructure: James Brady

Minnesota Counties Intergovernmental Trust
James Brady, Member
Greg Krueger, Alternate

National Association of Counties
All Commissioners

Gmail

Meeting Minutes

4 messages

[redacted] Fri, Jan 31, 2025 at 4:18 PM
To: "Fry, Renae" <Renae.Fry@steelecountymn.gov>

Hi Renae,

I'm looking for the meeting minutes from the Joint Transportation Committee meeting referenced in the board meeting minutes. I've searched Steele County's website but haven't been able to find them. Could you point me in the right direction?

Also, could you share the schedule for when they meet? I wasn't able to determine that from the board meeting minutes.

Thanks,
Melissa

[redacted] Fri, Jan 31, 2025 at 4:23 PM
To: "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Hi Rebecca,

I noticed that Renae is out of the office until February 10th. While this isn't urgent, I'm hoping it's a quick and easy answer that doesn't need to wait until then. Please see my original email below.

Thanks,
Melissa

Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> Tue, Feb 4, 2025 at 3:54 PM
To: [redacted]
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Melissa,

From this point forward, please direct any requests for documents/questions regarding the East Side Corridor to only myself and Ms. Fry. We will track the requests, provide data in the order it was requested, and in compliance with the Chapter 13 Government Data Practices Act.

The Act does not require specific time frames for data release and does not require government agencies to answer specific questions.

The County is still working on reviewing current data requests on top of the day-to-day normal operations. I do not have an estimated time frame right now.

Related to your request below for "Joint Transportation Committee" minutes, Steele County does not maintain those minutes, so therefore does not have the minutes to provide you.

Thank you,

Rob

Robert J. Jarrett

County Attorney

Steele County Attorney's Office

303 S. Cedar Avenue

Owatonna, MN 55060

Tel: 507-444-7780

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[redacted] Wed, Feb 5, 2025 at 12:44 PM

To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>

Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Robert,

Sure thing. I initially sent this to Renae, assuming she would have the answer. I received an out-of-office response directing me to contact Rebecca, so I did.

I expected the Joint Transportation Committee Meeting to have a publicly available schedule and meeting details, like other committees, but I couldn't find that information, which is why I reached out through the appropriate channels. I wasn't aware that this type of information is considered a data request, especially since schedules pertain to future events.

I look forward to hearing where I can find this information.

Thanks,
Melissa

Gmail

Data Request

6 messages

[redacted] Mon, Mar 31, 2025 at 9:28 AM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>, "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

I am submitting the attached data request for review, ASAP. I have copied the County Administrator and County Attorney as requested.

Thanks,
Melissa Zimmerman

JointTransporationCommiteeDataRequest03312025.docx
73K

Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> Tue, Apr 1, 2025 at 5:15 PM
To: [redacted] "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Ms. Zimmerman,

This is not a data request. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format in order to answer questions.

This request will be closed.

Sincerely,

Robert Jarrett

Steele County Data Practices Responsible Authority

Robert J. Jarrett

County Attorney

Steele County Attorney's Office

303 S. Cedar Avenue

Owatonna, MN 55060

Tel: 507-444-7780

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[Quoted text hidden]

[redacted] Tue, Apr 1, 2025 at 5:38 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Dear Mr. Jarrett,

I am requesting any and all data pertaining to the topics outlined in my request. I am not expecting you to answer a question; I am requesting access to existing government data, which should be standard practice under the Minnesota Government Data Practices Act.

If my request needs to be submitted in a different format, please let me know so I can adjust accordingly. Otherwise, please proceed with processing this as a formal data request.

Sincerely,
Melissa Zimmerman

[Quoted text hidden]

---

image001.png
20K

[redacted] Wed, Apr 2, 2025 at 12:55 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Here is the requested data, reformatted into statements.

[Quoted text hidden]

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2 attachments

image001.png
20K

JointTransporationCommiteeDataRequest03312025 (1).docx
73K

[redacted] Thu, Apr 10, 2025 at 8:16 AM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

It has been 8 days and I have not received confirmation on this data request.

[Quoted text hidden]

---

image001.png
20K

[redacted] Mon, Apr 14, 2025 at 8:21 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Dear Mr. Jarrett and Ms. Fry,

This is a formal follow-up regarding my data request originally submitted on March 31, 2025, and resubmitted in clarified format on April 2. Despite multiple efforts on my part—including a request for clarification and a follow-up on April 10—I have not received any acknowledgment, response, or update.

In your email dated April 1 at 5:15 p.m., you stated my request was not valid under Minnesota Statutes Chapter 13 and indicated the request would be closed. However, you failed to cite any specific provision of the law that justified denying or delaying the request. In my response later that day, I clarified that I was requesting access to existing government data—not answers to questions—and asked that you let me know if any changes were needed in formatting. You did not respond.

I then removed all question marks and resubmitted the same request on April 2. Again, you did not process it. In a separate message on April 10, you indicated that this request will not be addressed until other ESC-related data requests are fulfilled. That is not permissible under Minnesota law.

This refusal to process a lawful request until others have been completed is a direct violation of your obligations under the Minnesota Government Data Practices Act (MGDPA).

Violations of Statute:

1. **Minn. Stat. § 13.03, subd. 2(a)**
   The statute requires that government entities respond to data requests in an appropriate and prompt manner. There is no provision in the statute that allows an entity to refuse a new request simply because other requests are still pending. Each request must be handled independently and without delay.

2. **Minn. Stat. § 13.03, subd. 3(f)**
   If access to data is denied, the Responsible Authority must provide written notice to the requestor, including the specific statutory section on which the denial is based. To date, you have not provided such a citation.

3. **Improper Refusal to Accept a Valid Request**
   Multiple Advisory Opinions issued by the Commissioner of Administration—including 95-042, 04-019, and 05-030—make clear that:

- A data request cannot be denied simply because it contains question formatting or interpretive language.
- If a request seems unclear, the entity must seek clarification, not dismiss it.
- Government entities cannot refuse to process valid requests due to workload or the existence of other pending requests.

Expectations:

I am now formally demanding the following:

1. Immediate reinstatement and full processing of my March 31 (resubmitted April 2) data request.
2. A written acknowledgment that this request is being processed in accordance with Minnesota Statutes Chapter 13.
3. A specific citation of the legal basis you relied on to close or delay my request, as required under Minn. Stat. § 13.03, subd. 3(f).
4. A copy of Steele County's Data Practices Policy, and the names and contact information for both the Responsible Authority and the Data Practices Compliance Official, as required by Minn. Stat. § 13.05, subd. 13.

If I do not receive written confirmation that this request is being processed in full compliance with the law by **April 15, 2025**, I will be filing formal complaints with the following:

- Office of the State Auditor
- Minnesota Attorney General's Office
- Department of Administration – Data Practices Office

This continued refusal to comply with the law obstructs lawful access to public data and raises serious concerns regarding Steele County's data handling practices.

Sincerely,
Melissa Zimmerman
[Quoted text hidden]

Gmail

data request

12 messages

Kris M. Busse <kris.busse@owatonna.gov> Thu, Apr 3, 2025 at 9:56 AM
To: [redacted]

Good morning,

I am writing on behalf of the City of Owatonna ("City") to acknowledge receipt of your request dated March 31, 2025, requesting information from the City relating to the joint transportation committee. The City is working on this request and will respond based on its obligations under the MGDPA.

Kris Busse

City Administrator

Administrative Services Department

WE CREATE A BETTER TOMORROW

Phone: 507-774-7340

Email: kris.busse@owatonna.gov

540 West Hills Circle, Owatonna, MN 55060

www.owatonna.gov

[redacted] Thu, Apr 3, 2025 at 10:04 AM
To: [redacted]

They're going to pull data. Woo-hoo. IDENTICAL request that the county denied.

[Quoted text hidden]

3 attachments

image001.png
22K

image002.png
2K

image003.png
2K

Kris M. Busse <kris.busse@owatonna.gov> Mon, Apr 14, 2025 at 4:40 PM
To: [redacted]

Good afternoon,

I reviewed your online “Data Request” for the City of Owatonna. Your correspondence is not a valid request for data. The Minnesota Government Data Practices Act (MGDPA), requires government entities to provide data that is requested that is accessible to the requester, subject to a government entity’s policies and procedures for making a request for data. The MGPDA does not require the city to answer questions that are not requests for data. Your correspondence asked questions instead of requesting data. Accordingly, the city is not required to respond to your correspondence under the MGDPA nor provide any data as no valid request for data was made.

[Quoted text hidden]

[redacted] Mon, Apr 14, 2025 at 5:09 PM
To: "Kris M. Busse" <kris.busse@owatonna.gov>

Dear Administrator Busse,

Thank you for your response. I respectfully disagree with your conclusion that my request was not a valid request for data under the Minnesota Government Data Practices Act (MGDPA).

To clarify, under Minn. Stat. § 13.03, subd. 3, a valid request for government data does not require specific legal language; a requestor need only reasonably describe the data sought. If you believe portions of my correspondence contained questions rather than topics, I am happy to refine or clarify the request. However, if any portion of my request reasonably seeks access to existing government data, the City has an obligation to respond accordingly.

Please specifically identify:

1. Which portions of my request you view as improper "questions" versus valid data requests.
2. Whether the City has any responsive existing government data related to the subject matter of my request.
3. If the City is denying access to any requested data, please cite the specific legal authority (statutory section and subdivision) on which you rely for any denial, as required by Minn. Stat. § 13.03, subd. 3(f).

I look forward to your clarification so that I may either modify or resubmit my request if necessary. Thank you for your attention to this matter.

Sincerely,
Melissa Zimmerman

Comment #148

DROPPING FEDERAL FUNDING TO AVOID NOISE MITIGATION

ESC EAW Comment #36

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: DROPPING FEDERAL FUNDING TO AVOID NOISE MITIGATION

I submit this comment to document a material deficiency in the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC): the deliberate removal of federal funding from the project **for the stated purpose of avoiding required noise mitigation**, including traffic noise analysis and construction of noise walls.

The administrative record demonstrates that the decision to eliminate federal funds was not based on environmental impact reduction, cost neutrality, or project feasibility, but rather to avoid compliance with federal noise requirements and associated mitigation obligations. This constitutes improper segmentation, predetermination, and avoidance of environmental review under MEPA.

1. Federal Funding Was Removed Specifically to Avoid Noise Mitigation

Internal correspondence among county staff, consultants, and MnDOT confirms that:

- Federal noise analysis and noise wall construction were anticipated outcomes if federal funds remained in the project;
- County Engineer told residents on Feb 11, 2025 that the noise wall vote was coming in the next couple weeks, followed by the EAW.
- On Feb 25, 2025 the County Engineer told the board and the public that a noise wall vote was coming in the new couple weeks followed by the EAW.
- The potential cost of noise walls was discussed as a primary concern;
- Removal of federal funding was proposed as a means to eliminate the need for federal environmental review (including CATEX) and noise mitigation.

These communications establish that the funding decision was driven by the desire to avoid environmental obligations, not by an independent project need.

2. Environmental Review Cannot Be Structured to Avoid Mitigation

Under Minn. R. 4410 and Minn. Stat. § 116D.04, an RGU may not:

- Structure a project to avoid environmental review;
- Segment federal and non-federal components to evade applicable standards; or
- Commit to a preferred outcome before environmental impacts are analyzed.

Here, noise impacts were known, discussed, and modeled, yet federal involvement was deliberately removed so that those impacts would not require mitigation. This is precisely the type of project structuring MEPA prohibits.

3. Noise Impacts Were Not Reduced

The removal of federal funding did not:

- Change the project alignment;
- Increase setbacks from residences;
- Reduce traffic volumes or speeds; or
- Eliminate the proximity of the roadway to existing homes.

Noise impacts therefore remained unchanged. The only effect of removing federal funds was to eliminate the regulatory mechanism requiring those impacts to be mitigated.

Avoiding mitigation is not the same as reducing environmental impact, and the EAW improperly treats these as equivalent.

4. Federal Action and Obligations Remained Unresolved

The record further shows ongoing uncertainty regarding:

- Whether federal permits (e.g., USACE, railroad coordination) would still apply;
- Whether federal "action" could still trigger federal noise requirements; and
- Whether FHWA or MPCA concurrence had been obtained prior to dismissing noise obligations.

The EAW nonetheless assumes that no federal or state noise standards apply, without documented confirmation from the relevant agencies.

5. An EIS Is Required

Because the EAW:

- Relies on the deliberate removal of federal funding to avoid noise mitigation;
- Fails to analyze significant noise impacts that remain unchanged;
- Segments environmental obligations from the project's true scope; and
- Reflects predetermination of outcomes prior to environmental review,

the EAW does not meet the requirements of MEPA for informed decision-making. An Environmental Impact Statement (EIS) with federal compliance is required to evaluate noise impacts, mitigation feasibility, alternatives, and the full scope of federal and state obligations.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Tuesday, March 25, 2025 8:30 AM
To: Fausto Cabral (fausto.cabral@state.mn.us)
Cc: sean.murphy@owatonna.gov
Subject: FW: ATP 6 2029 application template - CSAH 48/Main St Reconstruct

This message may be from an external email source.
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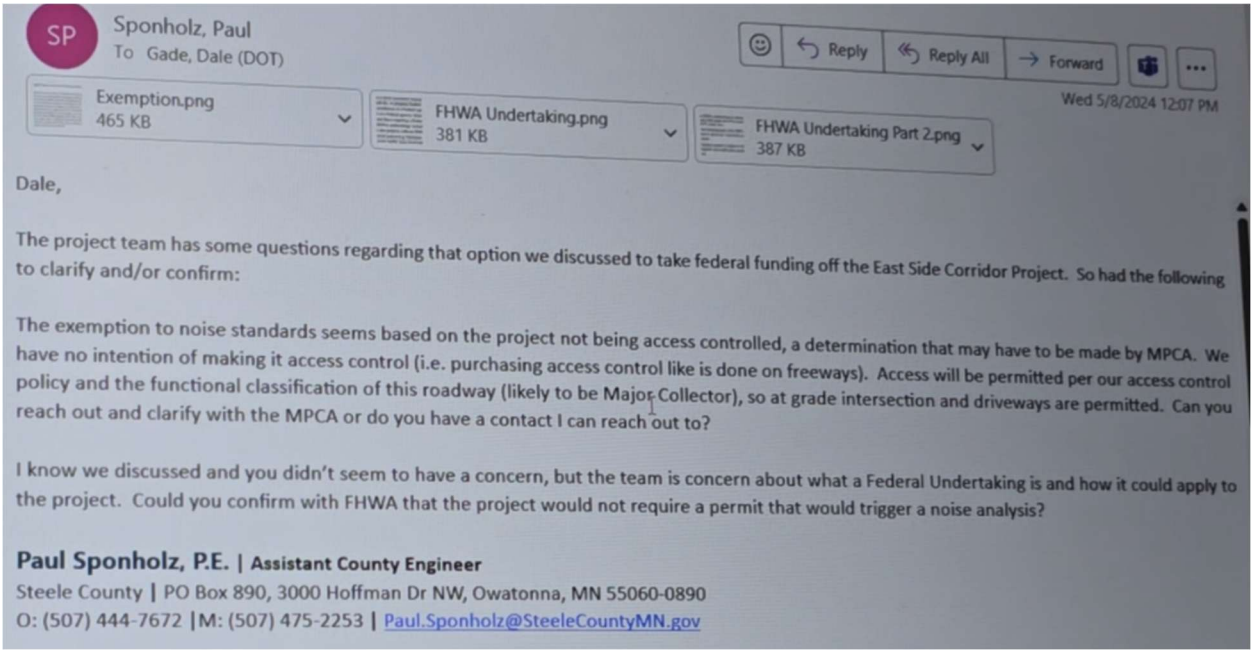
Fausto,

Sean has been discussing our joint project CSAH 48/Main Street with you for federal funding to help pay the city's share of the project. We already have federal HSIP funding ($450,000) for this project, so the project is already federalized.

What if we were to remove the federal funding from the East Side Corridor project and put it on this project, $3,960,000? That would solve some significant issues with the ESC, defederalize that project, and remove the need for us to do a CATEX on that project, while getting us the 30% needed on the Main St. project, a project that is already federalized. The biggest benefit, we'd align federal dollars better to maximize road improvements on Main Street and not have to spend a very significant portion of that nearly $4 million on noise walls, arguably not a good use for these funds.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



SP Sponholz, Paul
To Gade, Dale (DOT)

Reply | Reply All | Forward

Wed 5/8/2024 12:07 PM

Exemption.png 465 KB | FHWA Undertaking.png 381 KB | FHWA Undertaking Part 2.png 387 KB

Dale,

The project team has some questions regarding that option we discussed to take federal funding off the East Side Corridor Project. So had the following to clarify and/or confirm:

The exemption to noise standards seems based on the project not being access controlled, a determination that may have to be made by MPCA. We have no intention of making it access control (i.e. purchasing access control like is done on freeways). Access will be permitted per our access control policy and the functional classification of this roadway (likely to be Major Collector), so at grade intersection and driveways are permitted. Can you reach out and clarify with the MPCA or do you have a contact I can reach out to?

I know we discussed and you didn't seem to have a concern, but the team is concern about what a Federal Undertaking is and how it could apply to the project. Could you confirm with FHWA that the project would not require a permit that would trigger a noise analysis?

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Mary Gute <MGute@wsbeng.com>
Sent: Tuesday, April 30, 2024 9:49 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Ryan Earp <REarp@wsbeng.com>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Becky Haydon <Bhaydon@wsbeng.com>
Subject: RE: 074-070-009 Owatonna East Side Corridor Purpose and Need and Evaluation Criteria Memos

Paul, some follow-up on my previous e-mail, after talking with Becky. We want to clarify that the questions in the previous e-mail are related to a situation in which there are no federal funds involved with the ESC project.

Becky also noted that, based on feedback from MnDOT's Pete Wasko, it really is key to get the MPCA's input regarding the designation of an access-controlled facility. She pointed out that the MPCA's definition of access control isn't related to a facility's access type, but jurisdictional with control over facility access. See the attachment titled "Exemption."

The other attachments that Becky has provided are related to the potential for other required Federal permits or approvals potentially triggering a noise analysis, even in the absence of Federal funding.

Based on Pete's feedback, and the documentation attached, it does make sense to check in with the MPCA and FHWA to ensure they're on the same page regarding noise analyses requirements in the absence of federal funding. Thanks, Mary

From: Mary Gute
Sent: Tuesday, April 30, 2024 8:06 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Ryan Earp <REarp@wsbeng.com>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Becky Haydon <Bhaydon@wsbeng.com>
Subject: RE: 074-070-009 Owatonna East Side Corridor Purpose and Need and Evaluation Criteria Memos

Paul, I'm passing along an e-mail from Becky (see attached) regarding a conversation she had with Pete Wasko at MnDOT. Becky was checking state and federal state noise rules. In short, we suggest that you contact Dale at MnDOT State Aid to discuss the issues Becky asked about, including:

- Verification with MPCA that they agree with our interpretation about exemption from state noise standards. It's pretty obvious that the ESC would not be a full access control facility, however, it's worth it to get MPCA's documented agreement.
- Verification with FHWA (Phil) that the project would not require a Federal Permit that would trigger a noise analysis. Again, we anticipate that this is a dotting the "i"s and crossing the "t"s about this issue.

Dale could provide guidance and/or reach out to MPCA and Federal Highway regarding these issues based on his judgement. Please let us know if you have any questions about these items. Thanks, Mary

Re: ESC Noise Analysis

BH Becky Haydon <Bhaydon@wsbeng.com>
To Mary Gute; Jack Corkle; Andrew Plowman; Christopher Erickson

Reply | Reply All | Forward | ...
Mon 4/29/2024 12:26 PM

Follow up.
If there are problems with how this message is displayed, click here to view it in a web browser.

I discussed this issue with Pete Wasko today. He recommends the following:

1. Is the County exempt from State standards?
    a. County and/or State Aid rep should reach out to MPCA and ask if the MPCA agrees with the project being exempt from state noise standards. If the MPCA agrees that there is NOT full control of access on the proposed new road, then State rules do not apply. If the MPCA disagrees and instead would state that Full Control of Access is achieved on this road, then the project is required to meet MN state noise standards.
2. Does the project fall under Federal rules due to Federal 'action' - Permit?
    a. County and/or State Aid rep should reach out to FHWA to determine whether the Federal Permit required would trigger the federal rules and thus a Noise Analysis would be required to adhere to Federal Rules.

Both questions should be asked.

If anyone has any questions, please let me know.

Thanks-
Becky

From: Mary Gute <MGute@wsbeng.com>
Sent: Thursday, April 25, 2024 5:10 PM
To: Jack Corkle <JCorkle@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Becky Haydon <Bhaydon@wsbeng.com>; Christopher Erickson <chris.erickson@hzunited.com>
Subject: RE: ESC Noise Analysis

All, see Alison's response regarding the USACE permit. She notes she's never experienced a situation in which the USACE requires a noise analysis for a wetland permit.

We don't have any Section 4(f) resources in the area so there would be no FHWA approvals needed related to parks, trails, etc. Based on feedback we've heard from MnDOT's Cultural Resources Unit, there will very likely not be any archaeological resources. Railroads will likely be the only historic resources and we should anticipate a no adverse effects finding.

I don't know what FHWA could base the need for a noise analysis on at this point.

Mary
612.741.7055

...this message is displayed, click here to view it in a web browser.
From: Jack Corkle <JCorkle@wsbeng.com>
Sent: Thursday, April 25, 2024 5:06 PM
To: Andrew Plowman <APlowman@wsbeng.com>; Becky Haydon <Bhaydon@wsbeng.com>; Christopher Erickson <chris.erickson@hzunited.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: ESC Noise Analysis

I think we should have a call with Pete. I don't know that I agree with the interpretation that Natalie provided below.

We have done EAW projects and the items the permitting agencies are looking for are: historic/archaeological, section 4(f), and federal spe cies Noise has not come up as an issue.

I think a conversation with Pete W would be helpful.

Jack

Jack
612.719.4540

From: Becky Haydon <Bhaydon@wsbeng.com>
Sent: Thursday, April 25, 2024 3:58 PM
To: Andrew Plowman <APlowman@wsbeng.com>; Christopher Erickson <chris.erickson@hzunited.com>; Mary Gute <MGute@wsbeng.com>
Subject: Re: ESC Noise Analysis

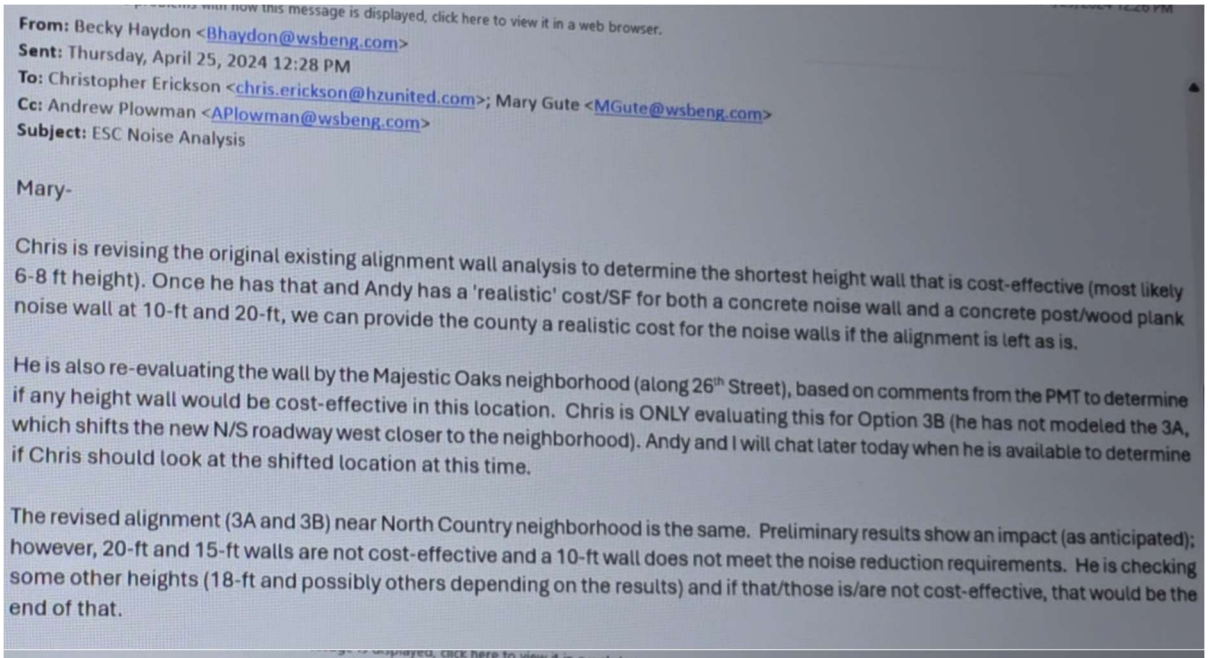
Andy-

Attached is the info for you to follow-up with Paul on so that we have confirmation from MnDOT OES (noise) and if need be FHWA on a determination of whether a noise study is needed if the federal funds are eliminated. I am definitely NOT trying to complicate the situation or create work, I just want to make sure that all parties know what exactly will be required before decisions are made.

Below is an e-mail exchange with MnDOT OES Metro (Natalie Ries) on the Scott Co 59 project:
Becky: One more option that I thought of is: If a federal permit is required = Type 1 project-noise analysis required (Is this accurate?) Natalie: Likely correct. This would be an unusual situation and FHWA may need to be involved on a case-by-case basis. I'm not sure what exactly this process would look like, but it is possible that a noise analysis could be required due to a federal permit.

Please let me know if you need anything else.

Thanks-
Becky



problems with how this message is displayed, click here to view it in a web browser.

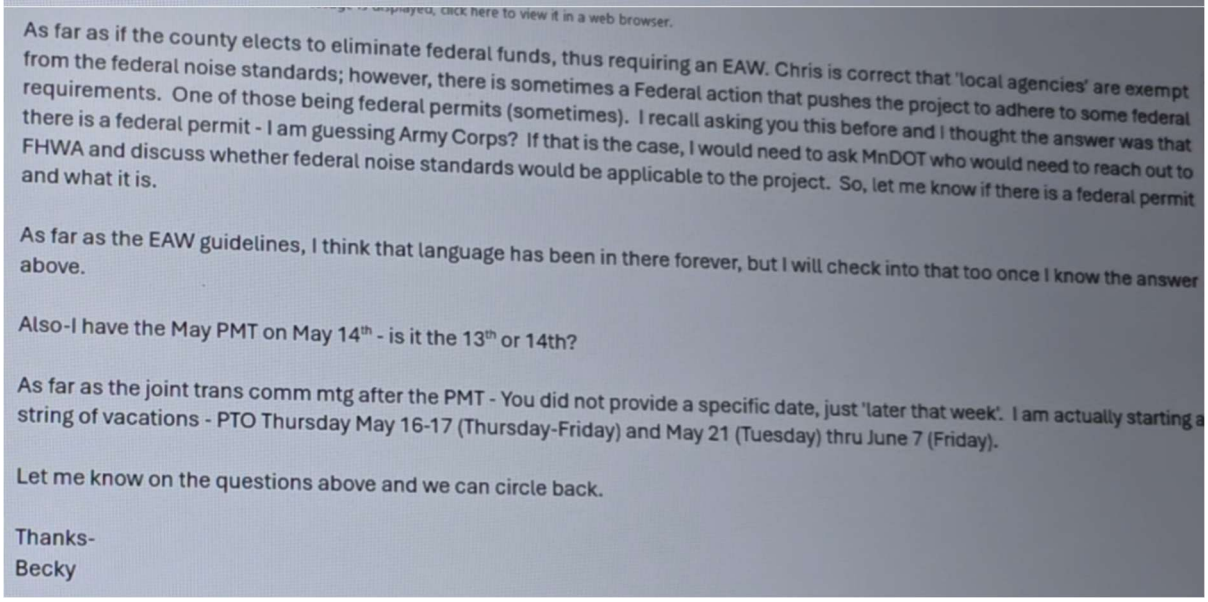
From: Becky Haydon <Bhaydon@wsbeng.com>
Sent: Thursday, April 25, 2024 12:28 PM
To: Christopher Erickson <chris.erickson@hzunited.com>; Mary Gute <MGute@wsbeng.com>
Cc: Andrew Plowman <APlowman@wsbeng.com>
Subject: ESC Noise Analysis

Mary-

Chris is revising the original existing alignment wall analysis to determine the shortest height wall that is cost-effective (most likely 6-8 ft height). Once he has that and Andy has a 'realistic' cost/SF for both a concrete noise wall and a concrete post/wood plank noise wall at 10-ft and 20-ft, we can provide the county a realistic cost for the noise walls if the alignment is left as is.

He is also re-evaluating the wall by the Majestic Oaks neighborhood (along 26th Street), based on comments from the PMT to determine if any height wall would be cost-effective in this location. Chris is ONLY evaluating this for Option 3B (he has not modeled the 3A, which shifts the new N/S roadway west closer to the neighborhood). Andy and I will chat later today when he is available to determine if Chris should look at the shifted location at this time.

The revised alignment (3A and 3B) near North Country neighborhood is the same. Preliminary results show an impact (as anticipated); however, 20-ft and 15-ft walls are not cost-effective and a 10-ft wall does not meet the noise reduction requirements. He is checking some other heights (18-ft and possibly others depending on the results) and if that/those is/are not cost-effective, that would be the end of that.



displayed, click here to view it in a web browser.

As far as if the county elects to eliminate federal funds, thus requiring an EAW. Chris is correct that 'local agencies' are exempt from the federal noise standards; however, there is sometimes a Federal action that pushes the project to adhere to some federal requirements. One of those being federal permits (sometimes). I recall asking you this before and I thought the answer was that there is a federal permit - I am guessing Army Corps? If that is the case, I would need to ask MnDOT who would need to reach out to FHWA and discuss whether federal noise standards would be applicable to the project. So, let me know if there is a federal permit and what it is.

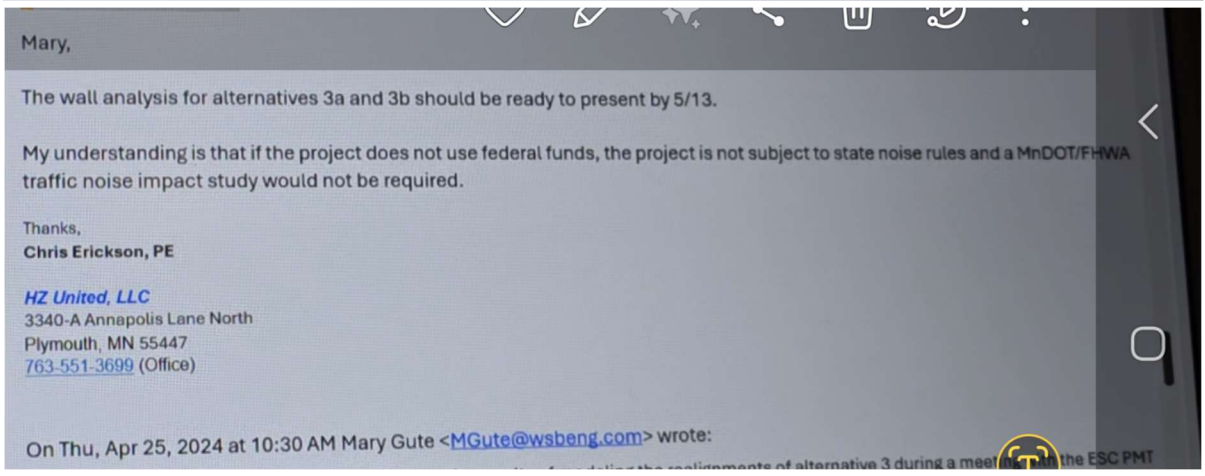
As far as the EAW guidelines, I think that language has been in there forever, but I will check into that too once I know the answer above.

Also-I have the May PMT on May 14th - is it the 13th or 14th?

As far as the joint trans comm mtg after the PMT - You did not provide a specific date, just 'later that week'. I am actually starting a string of vacations - PTO Thursday May 16-17 (Thursday-Friday) and May 21 (Tuesday) thru June 7 (Friday).

Let me know on the questions above and we can circle back.

Thanks-
Becky



Mary,

The wall analysis for alternatives 3a and 3b should be ready to present by 5/13.

My understanding is that if the project does not use federal funds, the project is not subject to state noise rules and a MnDOT/FHWA traffic noise impact study would not be required.

Thanks,
Chris Erickson, PE

HZ United, LLC
3340-A Annapolis Lane North
Plymouth, MN 55447
763-551-3699 (Office)

On Thu, Apr 25, 2024 at 10:30 AM Mary Gute <MGute@wsbeng.com> wrote:

alternative 3 during a meet the ESC PMT

On Thu, Apr 25, 2024 at 10:30 AM Mary Gute <MGute@wsbeng.com> wrote:

Chris & Becky – Would you be ready to discuss the results of modeling the realignments of alternative 3 during a meeting with the ESC PMT on May 13th? There is a joint transportation committee meeting with Owatonna and Steele Co later that week. The county could like to share with the committee whether or not a noise wall would likely be needed with the shifted alignment(s). Please let me know if that date works for a call, and if there are any time on that day where you couldn't do a call.

Also, we'll want to share with the city and county what noise analysis would be required if the county were to turn back federal funding and would just be required to do an EAW. I'll look into this and let you know what I find, but I'm interested both of you weighing in too. Thanks! Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

From: Sponholz, Paul <Paul.Sponholz@CO.STEELE.MN.US>
Sent: Friday, December 17, 2021 10:03 AM
To: Andrew Plowman <APlowman@wsbeng.com>
Subject: East Side Corridor

EXTERNAL EMAIL

Andrew,

The solicitation is out for ATP-6 STIP funding. The deadline is February 1, so I'll be putting together the application soon. One request for you, can you come up with some sort of estimate for the project's construction or verify my high level estimate? And break it down in two parts, Bixby Rd to Dane Rd, and Dane Rd to CSAH 8 (including the 26th Street extension).

My current rough estimate is $11,500,000 for construction. Based it on $2 million/mile assuming most to be rural 2-lane roadway, a few turn lanes, and some small urban sections. So with the 4.2 miles for the main corridor and another 0.5 miles for the 26th Street extension, comes to about $9.5 million for the road, with another $2 million thrown in for bridges which is probably low if we need a railroad bridge.

I doubt we'll get to far into the study to get much better estimates, but anything you can help add to or verify mine, that would be helpful. Thank you.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
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Comment #149

Unreliable Traffic Data and Shifting Truck Percentages
ESC EAW Comment #40

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Unreliable Traffic Data and Shifting Truck Percentages

During the **May 26, 2023** meeting, residents were provided traffic information by engineering staff, including a representation that **truck traffic would comprise approximately 15% of total traffic volumes** on the proposed roadway.

When residents later referenced this figure in subsequent discussions, the stated truck percentage **changed multiple times**, and residents were **ridiculed for repeating the figures originally provided to them by engineers**. This shifting information calls into question the reliability, consistency, and transparency of the traffic data underlying the project.

Traffic volumes and truck percentages are critical inputs for evaluating noise, safety, air quality, and cumulative impacts. When such data changes without explanation, the public is deprived of the ability to meaningfully evaluate project impacts.

The EAW does not disclose or reconcile these inconsistencies, nor does it explain which traffic assumptions are correct. Without stable and reliable traffic data, the EAW cannot serve as a valid basis for environmental decision-making, and a **FONSI would be unsupported**.

Because the proposed roadway would be located approximately **17 feet from existing homes**, and because the County dismissed rather than analyzed foreseeable risks to children, pedestrians, and neighborhood residents, the EAW fails to evaluate a core environmental impact. Public safety impacts in residential areas are not speculative; they are **reasonably foreseeable** and must be objectively analyzed under MEPA.

Where a project presents **potentially significant safety impacts to residential uses**, and where those impacts have not been meaningfully analyzed or mitigated, MEPA requires preparation of an **Environmental Impact Statement (EIS)**. An EIS is necessary to fully evaluate safety risks, examine design and mitigation alternatives, and ensure that decisions are based on a complete and defensible record.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

Comment #150

Predetermination and Premature Elimination of Alternatives 4 and 5
ESC EAW Comment #30

Date: December 29, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Predetermination and Premature Elimination of Alternatives 4 and 5

This comment is submitted to document material deficiencies in the alternatives analysis relied upon by the Environmental Assessment Worksheet (EAW) for the East Side Corridor project. Specifically, the EAW rests on a flawed analytical foundation due to the premature elimination of **Alternatives 4 and 5**, inconsistent application of evaluation criteria, and reliance on a federal memorandum that mischaracterizes comparative performance. These deficiencies undermine the integrity of the environmental review and render the EAW inadequate under the MEPA and NEPA

The alternatives analysis adopted by the EAW relies on data and conclusions contained in the project's federal memorandum. As the Responsible Governmental Unit (RGU), Steele County bears responsibility for ensuring that all information relied upon in the environmental review is accurate, complete, and neutrally applied, regardless of the original source.

In the federal memorandum, Alternatives 4 and 5 were eliminated on the basis that they did not meet the project's stated purpose and need, citing differences in volume-to-capacity ratios, travel time, and trip distance*. This comment does not concede that the project's stated purpose and need are valid; that issue is addressed separately using updated traffic data and growth assumptions.* Rather, this section demonstrates that even under the County's asserted purpose and need, Alternatives 4 and 5 were eliminated using inconsistent and outcome-driven criteria.

Internal project correspondence attached to this comment acknowledges that the elimination of Alternatives 4 and 5 was based on **minor performance differences** and that the analysis was structured to justify not advancing these alternatives rather than to objectively evaluate them.

Residents subsequently reviewed and recalculated the travel-time data presented in the federal memorandum using the exact distances and applying basic formulas rather than assumptions. That recalculation demonstrates that **Alternative 4 performs as the fastest option**, and that **Alternative 5 differs by approximately 30 seconds**. These differences are marginal in practical terms and do not constitute a meaningful failure to meet purpose and need, particularly when weighed against substantial differences in cost, right-of-way impacts, residential proximity, farmland conversion, and avoidance of established neighborhoods. These inconsistencies and others were recorded together in a document called *"Challenging Misleading Data: Prioritizing Safety, Accuracy, and Accountability in the East Side Corridor Federal Memorandum"* and is attached to this comment.

Residental Analysis of Alternatives Using Matememathical Formulas + Stops

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8	13min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7min/2.8 mi	10 min/4.3 mi	9 min/5.7 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	8 min/5.1 mi	11 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	6 min/3.3 mi	9 min/4.8 mi	10 min/6.0 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
5	26th St NE & Kenyon Rd	9 min/6.1 mi	12 min/7.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/4.3 mi	10 min/5.8 mi	11 min/7.0 mi

faster than existing
similar/shorter distance
slower than existing

**Alternative 3 in it's proximity to homes will cause a slower roadway - assumed a 40mph travel speed.
**Factored in 30 seconds for each of 4 stops on each route. Most stops do not take 30 seconds.

The recalculations referenced above were performed by a resident with a Bachelor of Science degree in Mathematics and Computer Science, applying standard and transparent formulas to the same data used in the federal memorandum. Although residents were not provided a formal opportunity to submit this analysis due to the lack of a granted comment period, the results were presented to Commissioners during public comment, placing the County on notice of material inaccuracies in the memorandum.

Despite this, Alternatives 4 and 5 were removed from further consideration without completion of a full and consistent evaluation. This premature elimination prevented meaningful comparison of reasonable avoidance alternatives that would have utilized an existing roadway corridor for the majority of their length. For all but approximately **1.25 miles**, the County already holds a **66-foot right-of-way**, the roadway continues to Kenyon Road, follows parcel boundaries, minimizes farmland bisections and avoids established residential neighborhoods.

The federal memorandum repeatedly states that Alternatives 2, 3, and 4 would experience comparable usage. When the memorandum's own travel-time data are recalculated using accurate distances, speeds, and stop conditions—rather than simplifying assumptions—**Alternative 4 demonstrates superior travel performance and lower overall costs**, while **Alternative 5 further reduces residential impacts, prioritizes farmland, and minimizes disruption by following existing infrastructure.**

Nevertheless, Alternatives 4 and 5 were eliminated based on negligible travel-time differences *before* cost efficiency, right-of-way availability, and impact avoidance were evaluated. Disregarding the memorandum's own findings regarding comparable usage and removing these alternatives prior to applying criteria used elsewhere reflects an inconsistent and outcome-driven application of evaluation standards that materially skews the alternatives analysis.

Internal project correspondence further corroborates that the alternatives analysis was structured to justify elimination of Alternatives 4 and 5 rather than to neutrally evaluate them. Prior to finalization of the federal memorandum, project staff discussed how to define growth areas, frame planning consistency, and characterize travel-time and performance differences in ways that would support advancing Alternative 3, while acknowledging that differences among alternatives were minor. These communications demonstrate that the analytical framework was shaped to align with a preferred outcome, reinforcing that Alternatives 4 and 5 were removed prematurely and that the EAW relies on a biased and outcome-driven analysis (See the attached additional analysis).

MEPA requires that alternatives be evaluated using consistent assumptions and methodologies so that decision-makers and the public can meaningfully compare environmental consequences and reasonable options. The selective inclusion and exclusion of impacts and performance metrics across alternatives violates this requirement and reflects **predetermination rather than objective environmental review**.

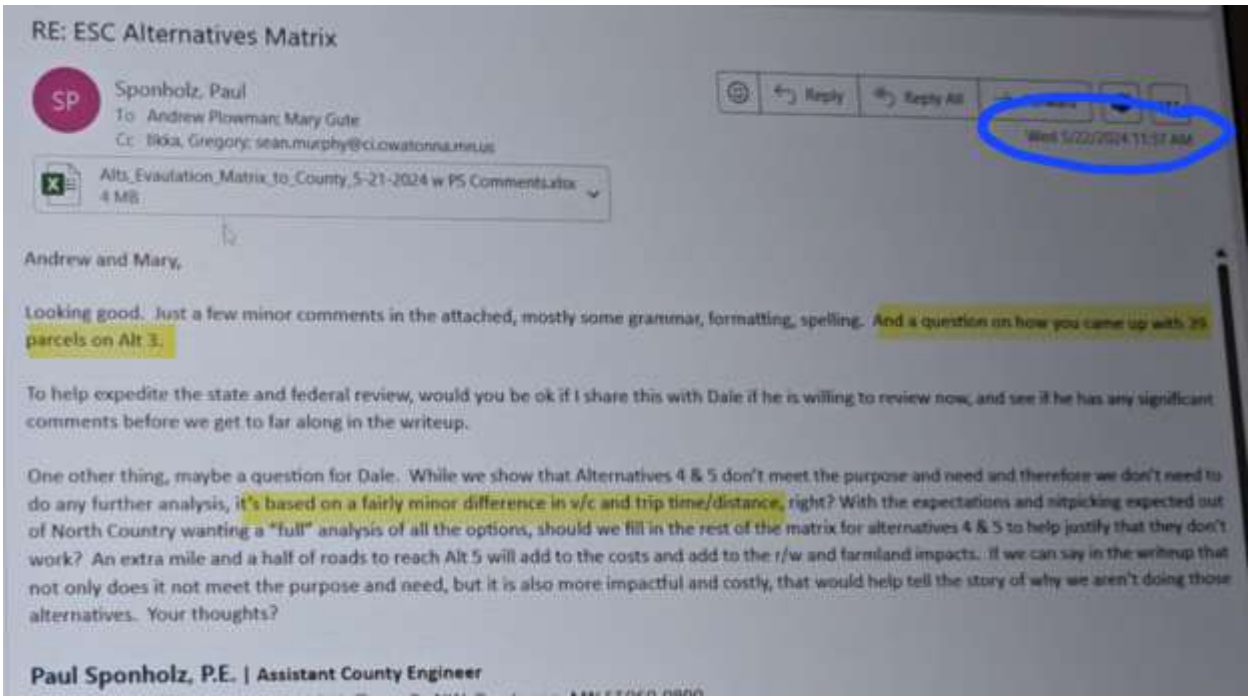
Because the EAW relies on this flawed foundation, it understates the true impacts of Alternative 3 on existing neighborhoods, obscures reasonable avoidance alternatives, and prevents meaningful public review. These deficiencies cannot be cured through post-hoc explanation or mitigation commitments.

An Environmental Impact Statement (EIS) is therefore required to correct the record, apply a consistent and transparent methodology across all alternatives, fully evaluate Alternatives 4 and 5, assess cumulative and foreseeable future impacts, and analyze reasonable avoidance options before irreversible commitments are made.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident
Mathematics & Computer Science, B.S.

Predetermination and Premature Elimination of Alternatives 4 and 5
ESC EAW Comment #30

Note: *Following the Administrative Law Judge's MGDPA compliance order, substantial amounts of public records that had previously been available for inspection were no longer present for inspection and could not be retrieved despite reasonable efforts. The absence of these records prevented obtaining official copies. Accordingly, screenshots of video footage are submitted as the best available documentation of the referenced information.*



RE: ESC Alternatives Matrix

SP Sponholz, Paul
To: Andrew Plowman; Mary Gute
Cc: Ikka, Gregory; sean.murphy@ci.owatonna.mn.us

Reply | Reply All

Alts_Evaulation_Matrix_to_County_5-21-2024 w PS Comments.xlsx
4 MB

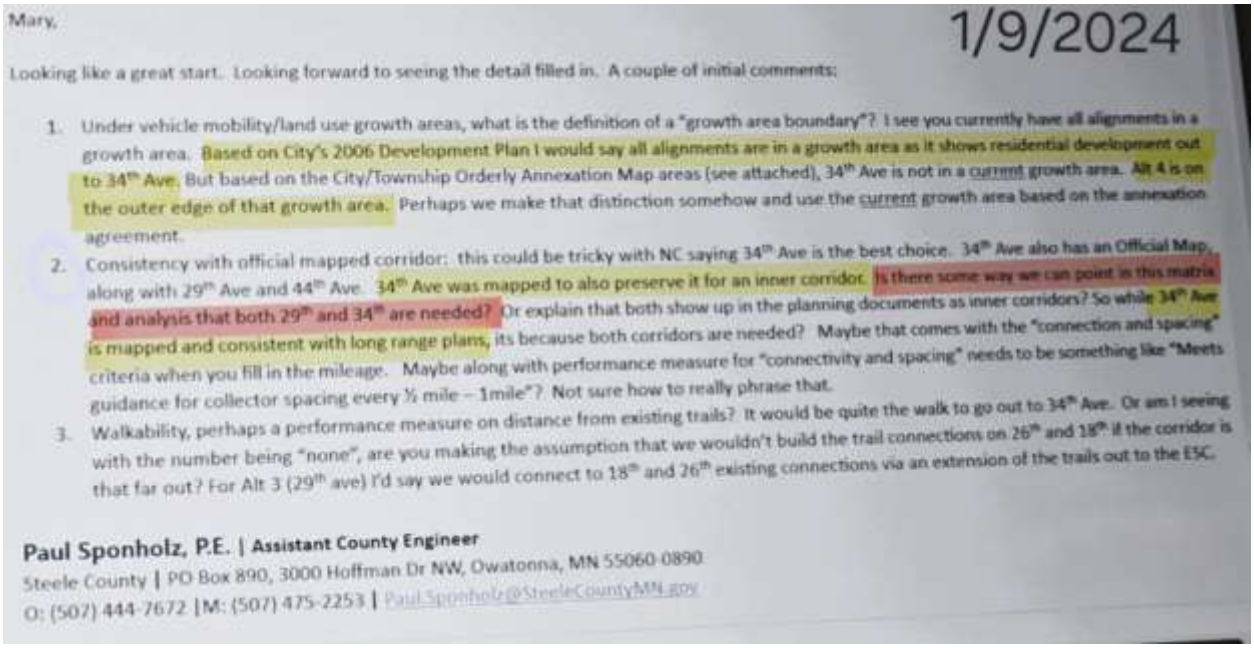
Andrew and Mary,

Looking good. Just a few minor comments in the attached, mostly some grammar, formatting, spelling. And a question on how you came up with 39 parcels on Alt 3.

To help expedite the state and federal review, would you be ok if I share this with Dale if he is willing to review now, and see if he has any significant comments before we get to far along in the writeup.

One other thing, maybe a question for Dale. While we show that Alternatives 4 & 5 don't meet the purpose and need and therefore we don't need to do any further analysis, it's based on a fairly minor difference in v/c and trip time/distance, right? With the expectations and nitpicking expected out of North Country wanting a "full" analysis of all the options, should we fill in the rest of the matrix for alternatives 4 & 5 to help justify that they don't work? An extra mile and a half of roads to reach Alt 5 will add to the costs and add to the r/w and farmland impacts. If we can say in the writeup that not only does it not meet the purpose and need, but it is also more impactful and costly, that would help tell the story of why we aren't doing those alternatives. Your thoughts?

Paul Sponholz, P.E. | Assistant County Engineer



Mary,

1/9/2024

Looking like a great start. Looking forward to seeing the detail filled in. A couple of initial comments:

1. Under vehicle mobility/land use growth areas, what is the definition of a "growth area boundary"? I see you currently have all alignments in a growth area. Based on City's 2006 Development Plan I would say all alignments are in a growth area as it shows residential development out to 34th Ave. But based on the City/Township Orderly Annexation Map areas (see attached), 34th Ave is not in a current growth area. Alt 4 is on the outer edge of that growth area. Perhaps we make that distinction somehow and use the current growth area based on the annexation agreement.
2. Consistency with official mapped corridor: this could be tricky with NC saying 34th Ave is the best choice. 34th Ave also has an Official Map, along with 29th Ave and 44th Ave. 34th Ave was mapped to also preserve it for an inner corridor. Is there some way we can point in this matrix and analysis that both 29th and 34th are needed? Or explain that both show up in the planning documents as inner corridors? So while 34th Ave is mapped and consistent with long range plans, its because both corridors are needed? Maybe that comes with the "connection and spacing" criteria when you fill in the mileage. Maybe along with performance measure for "connectivity and spacing" needs to be something like "Meets guidance for collector spacing every ½ mile – 1mile"? Not sure how to really phrase that.
3. Walkability, perhaps a performance measure on distance from existing trails? It would be quite the walk to go out to 34th Ave. Or am I seeing with the number being "none", are you making the assumption that we wouldn't build the trail connections on 26th and 18th if the corridor is that far out? For Alt 3 (29th ave) I'd say we would connect to 18th and 26th existing connections via an extension of the trails out to the ESC.

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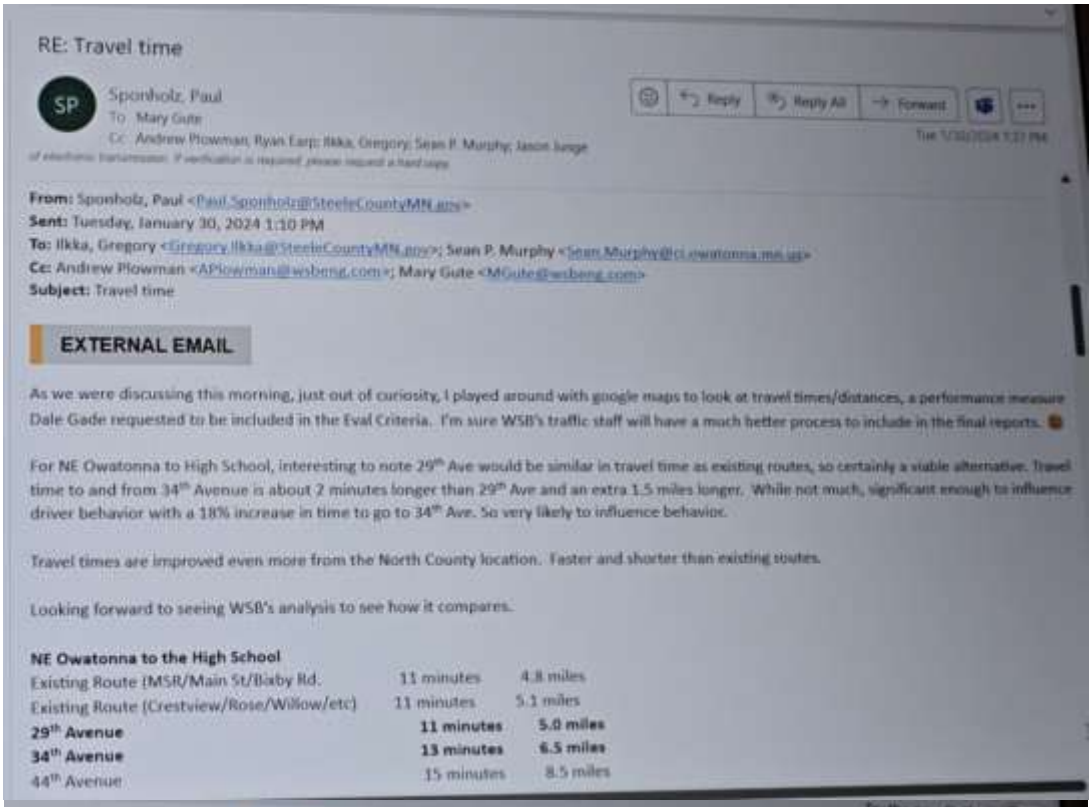


RE: Travel time

Sponsholz, Paul
To: Mary Gute
Cc: Andrew Plowman; Ryan Earp; Ilkka, Gregory; Sean P. Murphy; Jason Junge

Reply | Reply All | Forward

From: Sponsholz, Paul <Paul.Sponsholz@SteeleCountyMN.gov>
Sent: Tuesday, January 30, 2024 1:10 PM
To: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>
Cc: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: Travel time

EXTERNAL EMAIL

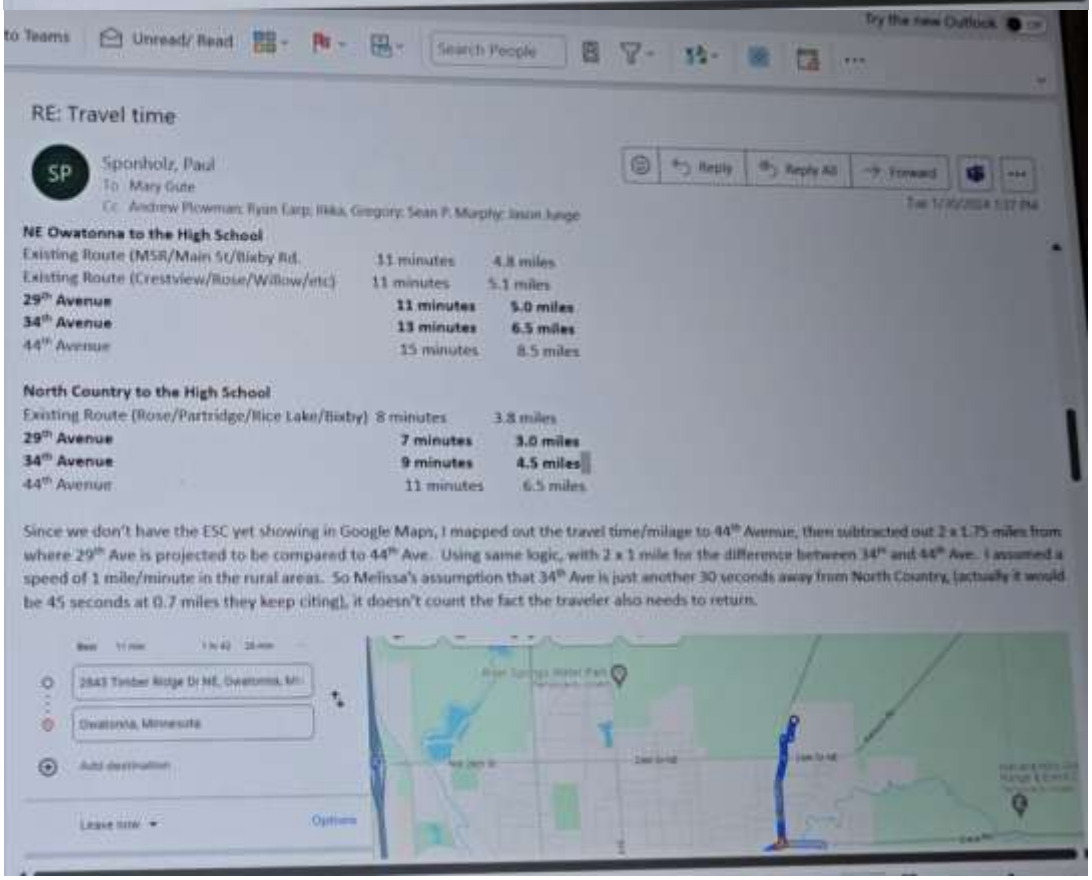
As we were discussing this morning, just out of curiosity, I played around with google maps to look at travel times/distances, a performance measure Dale Gade requested to be included in the Eval Criteria. I'm sure WSB's traffic staff will have a much better process to include in the final reports.

For NE Owatonna to High School, interesting to note 29th Ave would be similar in travel time as existing routes, so certainly a viable alternative. Travel time to and from 34th Avenue is about 2 minutes longer than 29th Ave and an extra 1.5 miles longer. While not much, significant enough to influence driver behavior with a 18% increase in time to go to 34th Ave. So very likely to influence behavior.

Travel times are improved even more from the North County location. Faster and shorter than existing routes.

Looking forward to seeing WSB's analysis to see how it compares.

NE Owatonna to the High School		
Existing Route (MSR/Main St/Bixby Rd.	11 minutes	4.8 miles
Existing Route (Crestview/Rose/Willow/etc)	11 minutes	5.1 miles
29th Avenue	**11 minutes**	**5.0 miles**
34th Avenue	**13 minutes**	**6.5 miles**
44th Avenue	15 minutes	8.5 miles



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RE: Travel time

Sponsholz, Paul
To: Mary Gute
Cc: Andrew Plowman; Ryan Earp; Ilkka, Gregory; Sean P. Murphy; Jason Junge

Reply | Reply All | Forward

NE Owatonna to the High School		
Existing Route (MSR/Main St/Bixby Rd.	11 minutes	4.8 miles
Existing Route (Crestview/Rose/Willow/etc)	11 minutes	5.1 miles
29th Avenue	**11 minutes**	**5.0 miles**
34th Avenue	**13 minutes**	**6.5 miles**
44th Avenue	15 minutes	8.5 miles

North Country to the High School		
Existing Route (Rose/Partridge/Rice Lake/Bixby)	8 minutes	3.8 miles
29th Avenue	**7 minutes**	**3.0 miles**
34th Avenue	**9 minutes**	**4.5 miles**
44th Avenue	11 minutes	6.5 miles

Since we don't have the ESC yet showing in Google Maps, I mapped out the travel time/milage to 44th Avenue, then subtracted out 2 x 1.75 miles from where 29th Ave is projected to be compared to 44th Ave. Using same logic, with 2 x 1 mile for the difference between 34th and 44th Ave. I assumed a speed of 1 mile/minute in the rural areas. So Melissa's assumption that 34th Ave is just another 30 seconds away from North Country, (actually it would be 45 seconds at 0.7 miles they keep citing), it doesn't count the fact the traveler also needs to return.

2843 Timber Ridge Dr NE, Owatonna, MN
Owatonna, Minnesota
Add destination
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Challenging Misleading Data: Prioritizing Safety, Accuracy, and Accountability in the East Side Corridor Federal Memorandum

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Chapter 1: History of the East Side Corridor

Introduction

The 61-page "Evaluation of Alternatives" Memorandum was prepared by Mary Gute of WSB on behalf of former Steele County Engineer Greg Ilkka and submitted to Phillip Forst of the Federal Highway Administration (FHWA) and Dale Gade of the Minnesota Department of Transportation (MnDOT) on August 13, 2024. It received formal approval from FHWA on September 3, 2024, and was subsequently circulated to Paul Sponholtz (current Steele County Engineer and project lead), Andrew Plowman (WSB Project Manager), Fausto Cabral (MnDOT District 6 State Aid Engineer), and others.

The document pertains to State Aid Project 074-070-009, which evaluates route alternatives for the proposed East Side Corridor. According to the Memorandum, the East Side Corridor is a joint initiative between Steele County and the City of Owatonna.

Given the Memorandum's use in federal and state environmental review processes, its accuracy and transparency are not only procedural matters—they are legal, financial, and ethical imperatives. Any inconsistencies, omissions, or biased representations in this document can significantly impact affected residents, undermine lawful planning standards, and erode public trust.

Page 1: Responsibility for East Side Corridor Project

The Memorandum confirms that the East Side Corridor is a joint initiative between Steele County and the City of Owatonna.

> This memo is being completed as part of the East Side Corridor Study, led by Steele County in cooperation with the City of Owatonna. The sections that follow discuss the

Page 3: Contradictory Use of Previous Studies

For nearly a year, city and county officials—including commissioners, engineers, council members, and administrators—have consistently stated that this is a "new project with a new purpose", thereby invalidating previous studies. This position has been publicly reiterated by City Administrator Kris Busse during City Council meetings and is documented in the public record.

However, this Memorandum now incorporates and compares data from those very past studies. This shift in narrative—treating older reports as both invalid and valid depending on the context—creates confusion and undermines transparency in the decision-making process.

> Previous planning efforts on the east side of Owatonna were initially reviewed to help define the study area and to develop East Side Corridor alternatives. Previously completed plans, studies, environmental documents, and mapping documents related to potential north-south transportation routes on the east side of Owatonna that have been completed since the 1990s are documented in the Owatonna East Side Corridor Location Memo, completed in August 2022 (see **Attachment A**). A common theme of the previous studies was similar to this project's purpose, which is to improve the connectivity of Steele County's transportation network and to meet near term and future travel needs on the east side of the City of Owatonna and adjacent townships.

Page 3: 24th Ave: Misrepresented History and Right-of-Way Confusion

The Memorandum references the 1999 study of 24th Avenue, which was rejected at that time for being too close to residential neighborhoods. That report recommended shifting the alignment 800 feet east to minimize noise and environmental impact (1999 Environmental Assessment Worksheet, p. 11).

Importantly:

- 24th Avenue was never designated as an officially mapped right-of-way.
- In 2000, a 150-foot-wide right-of-way—located 1,200 feet east of Greenhaven—was officially mapped and filed as what became known as 29th Avenue (Doc: A280471).
- The 2004 US 14 Beltline Study recommended preserving 34th Avenue (Alternative 5) and 44th Avenue for future corridors, noting 34th Avenue should serve as an *internal collector* with an overpass south of Highway 14.
- That same study recommended against using the mapped right-of-way as a beltline, suggesting it should only function as a shorter city street at most. (Page 30)

Subsequent planning and development reflected this shift:

- **2004 to Present** Homes and utilities were built on the officially mapped 29th Avenue right-of-way. 150' no longer exists.
- **2005-2025 Steele County Transportation Plan** identified (Page 11 & 15):
  - 29th Avenue as a short city street connector (Dane Road to Rose Street)
  - 34th Avenue (Alternative 5 today) as the preferred inner corridor
  - 44th Avenue as the external beltline
- **2006 Owatonna Development Plan** also designated 29th Avenue as a shorter city street, not an inner collector and 34th Avenue (Alternative 5 today) as an inner corridor. (Page 24, 37, 49)
- **2009:** Both 34th Avenue (Alternative 5 today) and 44th Avenue were officially mapped as 150-foot-wide right-of-way, aligning with the US 14 Beltline Study 2004.

Contrary to the Memorandum's claims, 24th Avenue was neither an officially mapped corridor nor comparable to current Alternative 3. Its designation as "Alternative A" in the 1990s placed it along what were then the outer edges of the city—similar in location to today's Alternative 1. These distinctions matter because omitting them distorts both the historical planning context and public understanding.

Many of these previous planning efforts focused on identifying a beltline route that would connect to US 14. In 1999 the Steele County Board selected a section of a beltline corridor route called 24th Ave, which would have largely been on new alignment. This route is similar to Alternative 3 in **Figure 1**. When MnDOT was planning to convert US 14 into a freeway and included an interchange at US 218/Bixby Road, it was then determined that the 24th Ave route could no longer connect to US 14 due to freeway interchange spacing requirements.

Studies in 2004 and 2011 concluded with the Steele County Board selecting CSAH 43 (44th Ave NE) as the east beltline and MnDOT committing to a future US 14 interchange at CSAH 43. With the potential beltline corridor moved farther east of Owatonna's city limits, the 2004 study identified that two additional north-south, inner collector roadways, closer to downtown Owatonna than CSAH 43, would be needed to meet area transportation needs. These inner collectors were recognized as necessary because the CSAH 43 alignment beltline would not contribute to reducing the downtown area traffic congestion due to distance.

The 2004 study documented that the 24th Ave route had been Officially Mapped by the County Board and that the City of Owatonna would assume responsibility for constructing the road as development warranted.[1] The 24th Ave route was planned to meet the existing transportation needs to reduce downtown traffic congestion and to accommodate existing development. The 2004 plan also recommended that the 34th Ave corridor (similar to Alternative 5, shown in **Figure 1**) be preserved for another long-term future internal collector roadway to accommodate additional long term city growth.[2] Based on that recommendation, the Steele County Board Officially Mapped the 34th Ave route.

These two, north-south corridors – 24th Ave and 34th Ave – are both included in the 2006 City Comprehensive Plan and Steele County's 2040 Transportation Plan. The locations of these identified future routes align with FHWA spacing guidelines and would serve future development without contributing additional congestion to the downtown area.

Page 4: Deviations to Mapped Right of Way

The Memorandum notes route deviations intended to avoid future development areas—specifically, vacant lots in a new subdivision north of town. However, similar efforts were not made to avoid established neighborhoods like North Country.

Despite repeated resident inquiries, the county has not provided data or justification for why some areas were spared while others were not. This inconsistency raises concerns about fairness in how impacts were distributed and decisions prioritized.

Alternative 3
New alignment approximately 2.2 miles east of CSAH 1/Cedar Ave/CSAH 45, with deviations north of CSAH 19 (Rose St) and south of CR 180. This alternative is generally consistent with the location of a Steele County officially mapped corridor.

Page 6: Contradictions in Pedestrian and Bicycle Comfort Measures

The Memorandum states that pedestrian and bicycle comfort measures were identical across all alternatives and therefore not used as criteria in selecting a preferred corridor.

However, later portions of the document inconsistently highlight bicycle accessibility as a differentiator—particularly in favor of some alternatives over others. This contradiction contributes to confusion and may mislead readers into thinking bikeability varied by route when it did not.

distances between origins and destinations by walking were all over 1 mile. Therefore, all of the alternatives were found to rate low for this measure. Additionally, the results for the criteria used to measure pedestrian and bicycle comfort all yielded high ratings for all alternatives, meaning that there was not a difference among the alternatives for this measure. Because all alternatives rated the same for these two measures and provided no differentiation, these measures were not included in discussion below or used to make a corridor recommendation. The evaluation process was structured so that if an alternative did not meet the majority of Step 1 criteria, it was eliminated from further evaluation in Step 2. The results of the project needs evaluation are shown in **Table 1** and described below.

Page 7: Inconsistent and Misleading Data Comparisons

Several discrepancies appear in the comparison tables, particularly around **connectivity, access, and location within city boundaries**:

- **Connectivity:** Page 34 addresses connectivity but contains significant discrepancies, including inaccurate distances and incorrect highlighting.
- **Access to existing subdivisions:** Noted yes for Alternatives 1–3. Alternatives 2 and 3 are shown to connect with existing neighborhoods, yet both would require continuous noise walls that effectively block access to the North Country Subdivision—functionally rendering them similar to Alternative 4, which is highlighted differently.
- **City Boundary Markings:** Alternatives 1b and 1c are listed as "within city boundaries: Yes," while Alternatives 2 and 3 are marked as "partially." In fact, **none** of the alternatives lie entirely within city limits. These inconsistencies may affect how the public and agencies perceive regulatory oversight and annexation implications.
- **Future Growth Boundaries**: The Memorandum states that Alternative 4 is on the "edge" of the future growth boundary. However, maps on pages 29 and 59 clearly show that the growth area extends to 34th Avenue (Alternative 5), placing Alternative 4 squarely within it—just like Alternative 3. The distinction presented is misleading.
- **Bicycle Accessibility:** While earlier pages stated this factor was not considered in route selection, the table on page 34 flags Alternative 4 negatively in red for bicycle accessibility—despite all routes having equal provisions. This selective emphasis distorts the comparison.

Table 1: Purpose & Need Performance Measures

Category	Evaluation Criteria	Performance Measures	1A: New alignment approx. 2 mi east of CSAH 1/Cedar Ave/CSAH 45	1B: Modification of Alt 1 to include Kenyon Rd and Dane Rd N or Dane Rd	1C: Modification of Alt 1 to include route along E Rose St, Partridge Ave, and new alignment S of Rose St.	2: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45	3: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45, with deviations N of Rose St and S of CR 180	4: New alignment approx. 2.5 mi E of CSAH 1/Cedar Ave/CSAH 45	5: 34th Ave E, approx. 3 mi E of CSAH 1/Cedar Ave/CSAH 45
Vehicle Mobility	Connectivity	Travel time between origins and destinations. Trip length/distance.* **(Attachment C)**	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 1 trip; same or similar time for 3/5 trips; longer for 1 trip. Shorter distance for 1 trip; same or similar distance for 3/5 trips; longer distance for 1 trip.	Shorter travel time for 1 trip; same or similar time for 3/5 trips; longer travel time for 1 trip. Shorter distance for 1 trip; same or similar distance for 3/5 trips; longer distances for 1 trip.	Same or similar travel time for 3/5 of trips; longer travel time for 2 trips. Shorter distance for 1 trip; longer distance for 4/5 of trips.	Longer distances and slower travel times for all 5 trips analyzed
	Downtown Congestion Impacts	Volume/Capacity ratios and typical planning-level capacity thresholds on downtown roadways **(Attachment D)**	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.93 Mineral Springs Rd (2): 1.01 Cedar Ave N: 0.92
	Land Use and Anticipated Growth Areas **(Attachment E)**	• Potential to support **current** land uses • Within and around the official city limits/boundary	Access to existing developments: yes Within city boundary: partially	Access to existing developments: yes Within city boundary: yes	Access to existing developments: yes Within city boundary: yes	Access to existing developments: yes Within city boundary: partially	Access to existing developments: yes Within city boundary: partially	Access to existing developments: no Within city boundary: no	Access to existing developments: no Within city boundary: no
		• Potential to support **future** land uses • Within and around the growth area boundary	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: edge	Access to future land uses: yes Within future growth boundary: no
Walkability and Bikeability **(Attachment F)**	Connections to Existing and Planned City Trails	Number of connections to **existing** city trails	**Existing:** Rose St E (to the west) (1)	**Existing:** 26th St NE (west), Mineral Springs Rd NE, Rose St E (west) (3)	**Existing:** Rose St (1)	**Existing:** none (0)	**Existing:** none (0)	**Existing:** none (0)	**Existing:** none (0)
		Number of connections to **planned** city trails	**Planned:** 26th St NE, Buxton Trail extension, Dane Rd, Rose St (to the east), 18th St SE (5)	**Planned:** 26th St NE (east), Dane Rd, Buxton Trail extension, Rose St (east), 18th St SE (5)	**Planned:** 26th St NE, Bruxton Trail extension, Dane Rd, Rose St, Havana Rd SE, 18th St SE (6)	**Planned:** 26th St NE, Dane Rd, Rose St, 18th St SE (4)	**Planned:** 26th St NE, Dane Rd, Rose St, 18th St SE (4)	**Planned:** 26th St NE, Dane Rd (2)	**Planned:** 26th St NE (1)
	Distances between Key Origins and Destinations as Compared to Distances People Are Willing to Walk and Bike	Alternative results in distances between origins and destinations** that people are willing to travel: **1 mile for walking**	No	No	No	No	No	No	No
		Alternative results in distances between origins and destinations** that people are willing to travel: **3 miles for biking**	Yes	Yes	Yes	Yes	Yes	No	No
	Pedestrian and Bicycle Comfort	• **P**edestrian Multimodal Level of Service (Oregon method) for segments • **B**icycle Multimodal Level of Service (Oregon method) for segments***	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C

Legend		
Low: Similar or longer travel times for all 5 trips analyzed.	**Medium:** Shorter travel time for at least one but less than 3 of the 5 trips analyzed	**High:** Shorter travel time for at least three of the 5 trips analyzed.
Low: At least one V/C ratio greater than 1.0	**Medium:** All V/C ratios less than 1.0. At least one V/C ratio greater than 0.80.	**High:** All V/C ratios less than 0.80
Low: does not provide direct access to existing developments AND not within city boundary	**Medium:** provides direct access to existing development(s) AND partially within city boundary	**High:** provides direct access to existing developments AND within city boundary
Low: does not provide access to future land uses OR is not within future growth boundary	**Medium:** provides access to future land uses AND is on edge of future growth boundary	**High:** provides access to future land uses AND is within future growth boundary
Low: 0 connections to existing city trails	**Medium:** 1-4 connections to existing city trails	**High:** 5+ connections to existing city trails
Low: 0 connections to planned city trails	**Medium:** 1-4 connections to planned city trails	**High:** 5+ connections to planned city trails
Low: Distance between origins and destinations is >1 mile	**Medium:** NA	**High:** Distance between origins and destinations is <1 mile
Low: Distance between the majority of origins and destinations is >3 mile	**Medium:** NA	**High:** Distance between the majority of origins and destinations is <3 mile
Low: Any MMLOS F	**Medium:** MMLOS D and/or E	**High:** All MMLOSs range from A-C

* Similar travel time refers to same travel time as existing to the nearest minute when rounded. Similar distance means within 0.5 miles of existing distance.
Some trips with longer distances have shorter travel times, primarily because these trips go through less-developed areas, allow for higher travel speeds, and result in less conflicting traffic compared to other routes.
** Origins (residential locations located within close proximity of the study area) and destinations (Owatonna High School, Owatonna Soccer Complex, Lincoln Elementary School, Hammann Park, Daikin Soccer Complex, Nass Woods Park, and Mineral Springs Park)
*** MMLOS was calculated for each alternative as one segment, assuming that corridor characteristics would be relatively similar. Inputs required for intersection MMLOSs are not available at this level of study.
Pedestrian LOS assumptions: one lane in each direction, sidewalk width of at least 5ft, speed limit at least 40 mph, and less than 500 vehicles/hr. Bicycle LOS assumptions: one lane in each direction, bicycle lane or shoulder at least 4ft, speed limit is not 30 mph or less, and there are unsignalized conflict points. Both were done for intersections only.

Summary of Pages 4–7

When corrected for accuracy and consistency, Alternative 4 closely resembles Alternative 3 in terms of location, access, and connectivity—but offers distinct advantages in terms of avoiding residential impacts. The inconsistencies in how these criteria are applied and visually highlighted suggest a potential bias in how data was presented to favor certain outcomes.

Page 8: Biased Assessment Criteria in Route Comparison

The Memorandum's comparison of travel times and distances presents several inconsistencies, particularly in how routes are visually and numerically rated.

Route Comparison

According to WSB's data on page 34 of the Memorandum, three out of five routes have similar travel times but slightly longer distances than existing trips. These were highlighted in yellow for Alternative 3. However, Alternative 4—despite showing comparable data—is flagged in red, suggesting a disadvantage that does not appear to be supported by the numbers.

When accurate measurements are applied, the relative efficiency of Alternative 4 improves further, undermining the color-coded implication that it is a less viable option.

Proximity to Homes: Alternative 3

WSB acknowledged on October 3, 2024, that Alternative 3 curves west and comes within 17 feet of existing homes. This realignment was made to partially align the route within city limits over a stretch of approximately seven blocks (one subdivision).

This proximity to homes raises several concerns:

- It would immediately trigger the need for **noise mitigation** per regulatory standards.
- It introduces **significant safety risks** for nearby families.
- These factors are **not fully addressed or acknowledged** in the Memorandum.

Growth and Annexation Areas

All route alternatives lie within the designated **growth area**. However:

- None are fully within the planned annexation area.
- Alternative 4, like Alternative 3, is centrally located in the middle of the future growth area, as shown on maps on pages 29 and 59.
- Unlike Alternative 3, Alternative 4 does not approach existing homes, preserving a buffer and avoiding the need to reduce the right-of-way.

These distinctions are material and contradict how the routes were rated in the report.

Route Ratings

Despite similar travel times and volume-to-capacity (V/C) outcomes, Alternative 3 is rated high, while Alternative 4 is rated low. This discrepancy is unexplained and may reflect selective emphasis rather than an objective scoring system.

Bikeability Considerations

The Memorandum initially stated that bikeability was **not a factor** in determining the preferred route (page 6). However, here, bikeability is **used to negatively differentiate** Alternative 4. This contradiction reinforces concerns about inconsistent evaluation criteria.

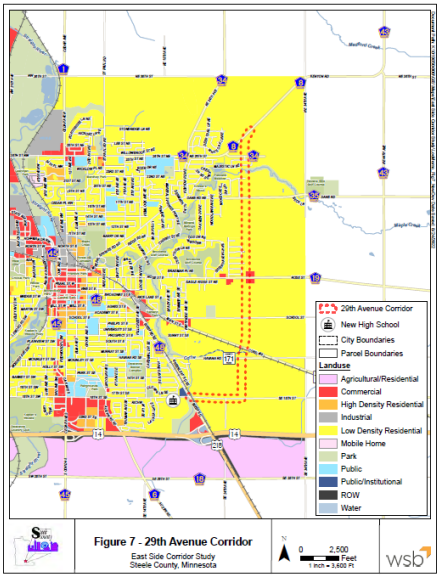
Alternative 3
This alternative rated either high or medium for all vehicle mobility measures. Relative to walkability and bikeability measures for which there are differences amongst alternatives, the alternative rated low for connections to existing trails. The majority of trips between origins and destinations would have shorter or similar travel times and distances when compared to existing trips. Alternative 3 would result in acceptable and improved volume/capacity (V/C) ratios on downtown roadways. This alternative is partially within existing city boundaries, and it is fully within the City of Owatonna's growth area boundary. While Alternative 3 only touches one current land use, it would connect several future land uses. This alternative does not connect to any existing city trails. It would connect to four planned trails, and would result in biking distances between origins and destinations of under three miles.

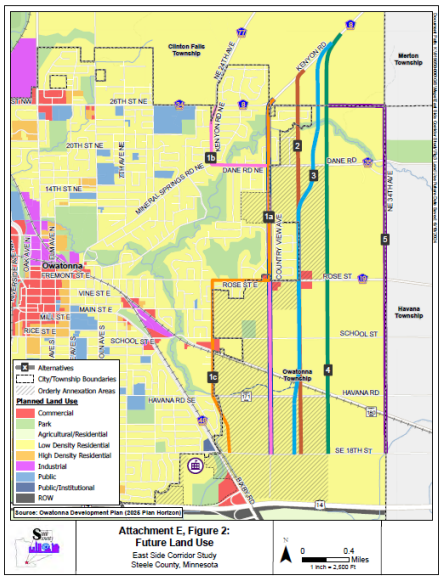
Alternative 4
This alternative rated low in multiple vehicle mobility measures, including trip length, distance, and travel time between origins and destinations; and the potential to support current and future land uses in proximity to the city's official boundary. The majority of trips between origins and destinations would have similar travel times but longer distances compared to existing trips. Alternative 4 would result in acceptable volume/capacity (V/C) ratios on downtown roadways. This alternative would not connect any developed land uses, is not within the existing city boundary, and is on the edge of the growth area boundary. Alternative 4 does not connect to any existing city trails but would connect to two planned trails. It would not result in biking distances between origins and destinations under three miles.

Conclusion for Page 8

When the data is accurately and consistently presented, Alternative 4 performs comparably—or in several cases better—than Alternative 3, particularly when residential impacts and long-term growth considerations are factored in. Yet, it was rated significantly lower without clear justification.

Page 29 and 59 Growth Maps:





Page 9: Alternative 4: Unjustified Exclusion and Evaluation Bias

Alternative 4, despite being statistically similar to Alternative 3, is rated significantly lower in the Memorandum. This raises concerns about inconsistencies in the evaluation process and the rationale used to eliminate it from further consideration.

Connectivity

According to page 61 of the Memorandum, Alternative 3 includes a planned $2.3 million noise wall, which would run along its only neighborhood connection. However, that same noise wall would physically obstruct access to the subdivision it claims to serve—North Country—rendering its connectivity similar to Alternative 4.

When access restrictions are factored in, the connectivity benefit assigned to Alternative 3 becomes questionable, and its rating appears overstated.

Land Use and Anticipated Growth Areas

Pages 29 and 59 of the Memorandum show that Alternative 4 lies within the center of the planned growth area, just like Alternative 3. Its location supports future development and aligns with city expansion goals.

Despite this, Alternative 4 is described as less favorable, without data to support how its placement within the growth boundary is meaningfully different from Alternative 3.

Bikeability

Page 6 of the Memorandum notes that bikeability was not used to determine preferred alternatives. Yet later sections selectively highlight this feature to down score Alternative 4. This contradiction undermines the objectivity of the evaluation process.

Volume-to-Capacity (V/C)

The Memorandum identifies meeting V/C goals as a key purpose-and-need criterion (criterion #2). Both Alternatives 3 and 4 meet this standard, yet only Alternative 3 receives favorable marks for doing so. This omission in the scoring for Alternative 4 distorts its overall performance in the matrix.

Cost Considerations

Alternative 4 avoids the need for both a $2.3 million noise wall and the $7.8 million urban road redesign required by Alternative 3. These savings represent a substantial cost difference. If Alternative 4 had been fairly evaluated, it would likely have been shown to be more cost-effective and less impactful to existing residents.

> In addition to the low ratings described above, both Alternatives 4 and 5 received low ratings for these vehicle mobility measures: 1) connectivity, and 2) land use and anticipated growth areas; and 3) distances between origins and destinations for bicycles. Alternative 5 also received low ratings for downtown congestion impacts and potential to support future land uses within and around the City of Owatonna's growth area boundary. For these reasons, Alternatives 4 and 5 were not carried forward for further analysis.

Summary of Findings

Alternative 4:

- Meets the same core criteria as Alternative 3
- Avoids proximity to residential homes
- Does not require a noise wall or costly urban design modifications
- Supports city growth within the mapped boundary
- Would likely be significantly less expensive

The exclusion of Alternative 4 from further study, despite its clear viability, raises questions about the integrity and transparency of the evaluation process.

Page 11: SEE Evaluation: Inconsistent Impact Ratings and Miscalculations

Table 2: SEE Impacts and Additional Considerations Performance Measures

	Category	Evaluation Criteria	Performance Measures	1A: New alignment approx. 2 mi east of CSAH 1/Cedar Ave/CSAH 45	1B: Modification of Alt 1 to include Kenyon Rd and Dane Rd N or Dane Rd	1C: Modification of Alt 1 to include route along E Rose St, Partridge Ave, and new alignment S of Rose St.	2: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45	3: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45, with deviations N of Rose St and S of CR 100
SEE Impacts	Wetlands	Potential impacts to resource	Acreage of wetland resources impacted (See **Attachment G**)	1.11	1.01	1.99	1.16	1.39
	Right of Way	Property impacts	Number of parcels affected	Parcels Affected - 98	Parcels Affected - 100	Parcels Affected - 126	Parcels Affected - 63	Parcels Affected - 60
			Permanent acres of property impacts	Perm - 43.25 Acres	Perm - 40.78 Acres	Perm - 32.1 Acres	Perm - 47.55 Acres	Perm - 56.08 Acres
			Number of residential and business relocations	35 residences 1 business	37 residences 1 business	49 residences 1 business	10 residences 0 businesses	0 residences or businesses
	Farmland	Potential impacts to farm resources (**Attachment H**)	Acreage impacts to all farmland	26.62	25.64	17.42	45.6	54.88
			Acreage impacts to prime farmland, prime farmland if drained, and farmland of statewide importance	Prime Farmland - 6.94 Acres Prime Farmland if Drained - 2.19 Acres Farmland of Statewide Importance - 0.56 Acres **TOTAL Impacts: 9.69 Acres**	Prime Farmland - 7.64 Acres Prime Farmland if Drained - 2.22 Acres Farmland of Statewide Importance - 0.13 Acres **TOTAL Impacts: 9.99 Acres**	Prime Farmland - 7.85 Acres Prime Farmland if Drained - 2.71 Acres Farmland of Statewide Importance - 0.53 Acres **TOTAL Impacts: 11.09 Acres**	Prime Farmland - 16.96 Acres Prime Farmland if Drained - 3.62 Acres Farmland of Statewide Importance - 1.60 Acres **TOTAL Impacts: 22.18 Acres**	Prime Farmland - 22.13 Acres Prime Farmland if Drained - 9.79 Acres Farmland of Statewide Importance - 1.25 Acres **TOTAL Impacts: 33.17 Acres**
			Number of farmland parcels potentially bisected	0	0	0	1	4
	Noise	Potential impact to noise receptors	Number and type of noise receptors potentially impacted*	Residential - 83 Parks - 1 Businesses - 2 **TOTAL: 86 Noise Receptors**	Residential - 135 Parks - 1 Businesses - 2 **TOTAL: 138 Noise Receptors**	Residential - 158 Parks - 1 Businesses - 3 **TOTAL: 162 Noise Receptors**	Residential - 30 **TOTAL: 30 Noise Receptors**	Residential - 27 **TOTAL: 27 Noise Receptors**
	Contaminated Properties	Impact to site with potential for hazardous materials	Number of impacted contaminated sites (in Minnesota Pollution Control Agency's What's In My Neighborhood database) (**See Attachment I**)	1	1	1	1	2
	Utilities	Potential to impact mapped facilities	Qualitative Assessment: Potential impact to mapped utilities	Medium Impact	Medium Impact	Medium Impact	Low Impact	Low Impact
	Floodplain	Potential impact to resource	Number of resources impacted (resource impacted and encroachment type for informational purposes only). (**See Attachment G**)	1: Maple Creek (Transverse)	1: Maple Creek (Transverse)	2: Maple Creek (Transverse) & Izaak Walton Creek (Transverse/Longitudinal)	1: Maple Creek (Transverse)	1: Maple Creek (Transverse)
			If applicable, number of feet of encroachment into floodplain	811	78 (An existing crossing on Dane Rd NE is in place at this location)	Maple Creek: 811 Izaak Walton (Transverse): 615 Izaak Walton (Longitudinal): 295	769	636
	Protected Species	Potential impact to federal threatened and endangered species	Species listed for the alternative corridor area based on the Information for Planning and Consultation (IPaC) tool	An IPaC report pulled for the East Side Corridor Study area showed numerous Federally endangered, proposed endangered, or candidate species (including mammals, birds, insects, and flowering plants). No critical habitats were identified within the study area. Bald eagles were identified as likely present within the project area. Numerous other bids were identified as warranting special attention in the project area. The IPaC tool is not detailed enough to specify meaningful differences amongst the alternatives under consideration. A more detailed Federal species review will be completed as part of the environmental review process completed for the preferred alternative.				
		Potential impact to areas of Biodiversity Significance	Areas of Biodiversity Significance potentially impacted (acres) (**See Attachment J**)	1.5	1.75	1.5	0.1	0.1
		Potential impact to DNR Native Plant Communities	Areas of DNR Native Plant Communities potentially impacted (acres) (**See Attachment J**)	1.5	1.75	1.5	0.1	0.1
Additional Considerations	Consistency with Local and Long-Term Plans	Consistency with local and long-term plans	Is the alternative consistent with the corridor vision articulated in local planning and development documents?**	Medium	Medium	Medium	High	High
	Estimated Project Costs	High-level estimate to construct alternative	Estimated project costs*** (**See Attachment K**)	$41.1M	$46.5M	$49.3M	$34.2M	$29.8M

Legend		
Low: >2 acres of impacts	Medium: 1-1.99 acres of impacts	High: < 1.0 acres of impacts
Low: 66+ parcels affected	Medium: 34-65 parcels affected	High:0-33 parcels affected
Low: 66+ acres of impacts	Medium: 34-65 acres of impacts	High: 0-33 acres of impacts
Low: Any residential or business relocations.	Medium: NA	High: 0 residential and business relocations.
Low: 66+ acres of impacts	Medium: 34-65 acres of impacts	High: 0-33 acres of impacts
Low: >40 acres of impacts to prime farmland and farmland of statewide importance	Medium: 20-40 acres of impacts to prime farmland and farmland of statewide importance	High: <20 acres of impacts to prime farmland and farmland of statewide importance
Low: >4 farmland parcels bisected	Medium: 1 -4 farmland parcels bisected	High: 0 farmland parcels bisected
Low: 100+ Noise Receptors	Medium: 51-100 Noise Receptors	High: 0-50 Noise Receptors
Low: >4 contaminated sites	Medium: 1-4 contaminated sites	High: 0 contaminated sites
Low: Relatively high level of development correlates to many in place utilities.	Medium: Relatively moderate level of development correlates to some in place utilities.	High: Relatively low level of development correlates to few in place utilities.
Low: 2 types of encroachment (transverse and longitudinal)	Medium: One type of encroachment (transverse or longitudinal)	High: No encroachment
Low: 800'+ of impacts	Medium: 700'-799' of impacts	High: < 699' of impacts
Low: NA	Medium: NA	High: NA
Low: 1.0+ acres of impacts	Medium: 0.5 - 0.99 acres of impacts	High: 0.0 - 0.49 acres of impacts
Low: 1.0+ acres of impacts	Medium: 0.5 - 0.99 acres of impacts	High: 0.0 - 0.49 acres of impacts
Low: Not consistent with corridor vision articulated in all approved, local planning and development documents**	Medium: Partially consistent with corridor vision articulated in all approved, local planning and development documents**	High: Consistent with corridor vision articulated in approved, local planning and development documents**
Low: Cost >$40M	Medium: Cost $30< + $39M	High: Cost <$30M

* Note: Included receptors within 250' of either side of alternative corridor. These numbers are for comparison only, and are not based on detailed noise analyses.
** Specifically the Steele County 2040 Transportation Plan; City of Owatonna 2040 Transportation Plan; and Owatonna 2006 Development Plan.
*** Note: Costs are based on a high level of conceptual design that is consistent with this stage of project development. Project costs will continue to change as additional project details become available, and based on current pricing conditions. Construction costs are subject to market related fluxuations that cannot be predicted

Residential and Business Impacts

The Memorandum lists 10 residential relocations for Alternative 2. However, this route runs adjacent to Hill Drive—a layout that appears no more disruptive than Alternatives 2 and 3 along North Country. The relocation counts for Alternative 2 may therefore be overstated.

For Alternative 3**,** the Memorandum claims no residential impacts. However, early layouts included the Larry Schultz homestead. If adjustments could be made to spare a single home, it raises the question: why couldn't similar efforts be applied to preserve entire neighborhoods?

Additionally, the North Country Subdivision owns the westernmost 50 feet of the mapped 150-foot right-of-way. This directly affects at least 18 residential properties—a fact not reflected in the document's relocation estimates. In reality, these homes would require relocation under standard design widths.

The attempt to reduce the corridor to a 100-foot footprint to avoid eminent domain introduces its own problems: reduced safety margins, proximity to homes, and long-term usability concerns. Fair comparisons using the full 150-foot corridor standard would have revealed significantly more residential relocation impacts for Alternatives 2 and 3.

Farmland Disruption

Alternative 4 follows some existing parcel lines**,** which reduces bisecting farmland and lowers disruption to agricultural operations. Other alternatives, with the exception of alternative 5, are less efficient in this regard and create more fragmented farmland.

Noise Receptors

The Memorandum lists 27 noise receptors for Alternative 3. However, this figure appears based on a 250-foot buffer. Within North Country alone, there are at least 35 receptors at 250 feet—and 39 when using MnDOT's standard 300-foot measurement (per Figure R1).

Nearby farmsteads would increase this number even further. Alternative 2, which follows a nearly identical path to Alternative 3, likely shares these impacts—but the numbers do not reflect that.

Figure R1 – North Country Subdivision Noise Receptors

Utility Impacts

Alternative 3 is listed as having low utility impact, which is inconsistent with on-the-ground realities. In North Country:

- Overhead utility lines lie 50 feet east of the west edge of the mapped right-of-way
- AT&T fiber optic lines run along the east side

Relocating these utilities would be both complex and expensive, with costs for the fiber lines alone potentially in the hundreds of thousands, according to county officials. These Costs are not included in the cost analysis on page 61.

Project Cost Discrepancies

- **Alternative 2** is rated as "low cost" at $34.2 million, though the Memorandum defines projects between $30–39 million as medium cost. This classification inconsistency reflects a pattern of imprecise data usage.
- **Alternative 3** has seen its costs more than double since project inception. It is listed in the STIP as an $8 million project. The cost of mitigation measures continues to rise without reassessment.

Notably, Alternative 4 would avoid both the $2.3 million noise wall and the $7.8 million urban road upgrade, offering major savings.

Additional Observations on SEE Analysis

A significant issue with the SEE evaluation is that Alternative 3 is being compressed into a smaller footprint, unlike other alternatives. This narrower design was used to avoid triggering eminent domain—but it introduces design compromises that other routes weren't subjected to. Evaluating Alternative 3 under a reduced standard, while holding Alternative 4 to full-width impacts, skews the comparison unfairly.

If Alternative 4 had been evaluated using the same modified criteria applied to Alternative 3, it likely would have demonstrated even lower impacts and costs. It would not require a $2.3 million noise wall or a $7.8 million urban roadway segment for a single subdivision. These mitigation expenses are unique to Alternative 3 and should have weighed more heavily in the final evaluation.

Yet, despite meeting the Memorandum's documented purpose-and-need criteria, Alternative 4 was excluded from further study. This exclusion prevented stakeholders and decision-makers from conducting a side-by-side comparison that may have changed the preferred route recommendation.

Concerns About Reliability and Data Integrity

These discrepancies—many of which are easily verified through public records and basic math—raise larger concerns. If simple elements like color coding, impact counts, and buffer zones contain inaccuracies, it's reasonable to question how much of the remaining analysis is similarly flawed or selectively framed.

One specific example involves the use of thresholds in data visualization. A floodplain encroachment of 636 feet is marked as "green" because WSB selected 699 feet as the cut-off. The proximity of these values—just below the threshold—suggests the metric may have been chosen to present the encroachment in a more favorable light.

This practice is troubling, particularly when:

- The Shady Hills subdivision, developed within this same floodplain, led to significant flooding in nearby areas.
- The risks of similar outcomes from this project remain unaddressed in the Memorandum.

Would encroaching 699 feet into a floodplain truly avoid adverse impacts, or does that threshold merely serve a convenient narrative?

Missed Environmental and Community Impacts

Beyond the concerns above, the SEE report fails to address several key impacts that are typically required in environmental reviews. These include:

- Environmental Justice
- Climate Change and Greenhouse Gas Emissions
- Archaeological and Historical Resources
- Construction Impacts
- Energy Use
- Visual Impacts
- Tax Base and Property Value Effects
- Air Quality
- Wildlife, Fisheries, and Protected Species
- Vegetation
- Floodplains, Hydrology, and Aquifer Impacts
- Health Impacts
- Socioeconomic Disparities
- Light Pollution

Summary of SEE Discrepancies

The SEE analysis appears skewed in favor of Alternative 3 by:

- Understating residential impacts
- Downplaying utility relocation costs
- Applying inconsistent cost thresholds
- Using noise receptor buffers below MnDOT standards
- Comparing routes under different design assumptions

If Alternative 4 had been evaluated on equal terms—with full width right-of-ways, accurate relocation counts, and real-world mitigation costs—it would likely have emerged as significantly less impactful and more cost-effective than Alternative 3.

If a project costing under $30 million is considered favorable, then a valid question remains: Would Alternative 4—if properly evaluated—have cost closer to $20 million? If so, would the benchmark for a “good value” remain fixed at $30 million?

In light of the inconsistencies, omissions, and selectively applied thresholds, stakeholders are justified in questioning whether the Memorandum truly reflects a neutral and comprehensive evaluation, or if it was structured to support a preselected outcome—a violation of the environmental process.

These inconsistencies call into question the overall accuracy and objectivity of the Memorandum's conclusions.

Page 15: SEE Summary: Unequal Treatment of Neighborhoods

Alternative 2, which runs adjacent to Hill Drive, is shown to require 10 residential relocations—a number acknowledged in the SEE analysis and seemingly used to justify rerouting that segment.

In sharp contrast, Alternative 3 relies on a mapped 150-foot-wide right-of-way that cuts directly through the North Country Subdivision, where homes have already been built. This right-of-way was officially mapped in 2000 (Doc: A280471), but the land was later developed with full city permits and no recorded objections or restrictions. Residents built legally and in good faith—never informed that their homes were on a corridor that would be reclaimed.

Despite this, the SEE analysis lists zero relocations for Alternative 3.

Meanwhile, Alternative 4, which runs adjacent to residential properties but does not encroach on residential land, is rated more negatively and was dismissed from further study.

The Memorandum statement "By Veering east, the segment of Alternative 3 north of Rose St avoids impacting the established neighborhood between Dane Rd and 26th St NE that Alternative 2 would go through" is key because it shows that WSB and Steele County made deliberate design choices to avoid one established neighborhood (Hill Drive), while failing to apply the same standard to North Country.

> While Alternative 2 scored similarly to Alternative 3 in many of the SEE categories and additional considerations, it would potentially result in the need for 10 residential relocations. By veering east, the segment of Alternative 3 north of Rose St avoids impacting the established neighborhood between Dane Rd and 26th St NE that Alternative 2 would go through.

The comparative logic applied here is inconsistent and difficult to justify.

Visual Evidence of Encroachment

Figure R2 clearly shows the officially mapped right-of-way overlapping with existing residential parcels in the North Country Subdivision. These are not future development sites—they are occupied homes. Yet the evaluation treats this encroachment as inconsequential, while simultaneously treating adjacent routing under Alternative 4 as a disqualifying factor.

At the same time, the Shady Hills Subdivision, which consists of undeveloped lots, appears to have received proactive protection through alignment shifts that preserved its future development space. No such adjustments were made for North Country residents, despite their properties being directly affected.

Figure R2: Officially Mapped Right of Way—Encroachment of North Country Subdivision

Implications of the Development Overlap

The decision to continue planning Alternative 3 implies that the county intends to build a high-speed road through a neighborhood that was legally permitted and developed, rather than adjusting the alignment or compensating impacted families.

This situation should require eminent domain, relocations, or a drastically reduced road footprint. However, instead of acknowledging this, the city and county are proposing to compress the corridor into just 100 feet because they cannot afford the cost of acquiring the developed land.

This places the burden of a funding shortfall on homeowners—forcing them to live just feet from a high-speed arterial without adequate buffer zones. It also introduces long-term safety concerns, design compromises, and degradation of quality of life, none of which are accounted for in the current evaluation.

By contrast, undeveloped lots in the Shady Hills subdivision were actively avoided in Alternative 2. More care was given to protecting future development than to mitigating harm to current residents.

Summary
The SEE analysis treats North Country as if it were undeveloped, despite the fact that the officially mapped corridor runs through existing residential properties**.** The failure to recognize, acknowledge, or mitigate this conflict reveals a serious inconsistency in how impacts were assigned and evaluated.

The result is a contradictory and inequitable assessment. If the goal of the Memorandum is to avoid or minimize residential impacts, then Alternative 4 should have remained under consideration while Alternative 3 should have triggered a more serious relocation count.

Page 17: Socioeconomic Disparities and Disproportionate Burden on Working-Class Families

Disproportionate Impacts on Working-Class Neighborhoods
The North Country Subdivision is located within a working-class neighborhood, built as part of the 2004 housing boom to address affordability and access. This area is home to numerous essential workers, multi-generational families, and residents with disabilities. Many homeowners in this subdivision live paycheck to paycheck, with limited capacity to absorb the disruption of relocation, construction, or prolonged uncertainty.

Yet, this community bears the most direct impact under Alternative 3—despite being the only route that requires a noise wall, encroaches on private residential property, and necessitates urban road modifications costing millions.

Although the proposed corridor is designed to be 150 feet of right-of-way, North Country residents own 50 feet of that corridor—land sold and permitted for housing after plans for the road were effectively abandoned in 2004. That year, the U.S. 14 Beltline Study recommended shifting the alignment to 34th Avenue (Alternative 5 today).

> A north-south corridor between 26th St NE and US 14 was officially mapped in 2000 based on a resolution passed by the Steele County Board of Commissioners on June 22, 1999. The official map depicts a right of way width of 150 feet (**Figure 1**).

Since then, homes were built with city approval on property no longer considered active right-of-way. Residents were told the road would not become a major highway. However, the current Memorandum classifies the route as a "major collector," confirming its highway-grade design.

> A new, north-south roadway on the east side of Owatonna would be owned and maintained by Steele County as a County State Aid Highway (CSAH), and would likely be classified as a major collector. The intent is for the new north-south roadway to connect to several collector roadways potentially including CSAH 8 (Kenyon Rd), CSAH 35 (Dane Rd), CSAH 19 (Rose St), and CR 180, along with several local roadways.

This deception—and the manner in which it's been handled— raises serious ethical and procedural questions.

Key Concerns Raised by Affected Residents:

Transparency

- Why haven't these facts been openly and honestly communicated to residents, elected officials, and the government?
- Why were homeowners allowed to build in this corridor?

Equal Treatment

- Why are these residents being asked to accept a compressed design while other properties and subdivisions were proactively avoided**?**
- Why wasn't Alternative 4 retained for further study, when it avoids this neighborhood entirely?

By Avoiding Eminent Domain, New Harms Are Introduced

To avoid property acquisition, planners reduced the design width to just 100 feet—bringing the highway within 17 feet of existing homes. This creates new and significant disparities:

Safety Concerns

- A high-speed corridor this close to occupied homes introduces clear risks.
- Yet, no formal safety study has been provided to assess the impact on nearby residents.

Property Devaluation

- No property value impact analysis has been conducted, despite the potential loss in home equity.

Socioeconomic Discrimination

- This neighborhood includes working-class families, individuals with disabilities, and those with limited means to fight back.
- Avoiding impact in more politically influential or undeveloped areas while compressing the design through North Country appears inequitable—and raises potential conflicts of interest**.**

Conclusion
Decisions of this scale must be rooted in honest communication, fair treatment, and thorough analysis. Before this highway is pushed within feet of homes that were built in good faith, the following must occur:

- Full evaluation of less harmful alternatives
- The corridor's history must be transparently acknowledged
- Independent analysis of safety and economic impacts should be conducted

Residents of North Country deserve the same level of protection and due process as any other community.

Page 18: The Mapped Right-of-Way: Abandonment, Reuse, and Legal Conflicts

The Legality and History of the Right-of-Way

Figure 1 from the Memorandum depicts the "Officially Mapped Corridor" officially filed in 2000 as a 150-foot-wide right-of-way, in today's footprint. At the time, the land was largely undeveloped and reserved on paper for potential future use. On March 9, 2004, a Joint Powers Agreement between the City of Owatonna and Steele County was signed. This agreement gave both entities:

- First right of refusal on development within the corridor,
- The ability to purchase property, and
- A six-month window to delay or contest development on any affected parcels.

In August 2004, just five months later, the U.S. 14 Beltline Study formally recommended routing the corridor along 34th Avenue (Alternative 5) instead. This marked a turning point. The original 150' corridor was effectively abandoned in practice—but not officially vacated.

Despite having legal tools to prevent conflict, the first home was built within the mapped corridor just six months after the Joint Powers Agreement was signed, and no contest or purchase attempt was made. Over time, a fully developed residential neighborhood—North Country Subdivision—emerged along the corridor.

Steele County and the City of Owatonna, did not retain easement rights, nor did it file legal claims to preserve the corridor through North Country. In fact, the county formally mapped 34th Avenue (Alternative 5) in 2009 as the replacement route. The city did not purchase the outlots until 2018—after years of foreclosure and conveniently timed with the reemergence of East Side Corridor planning efforts.

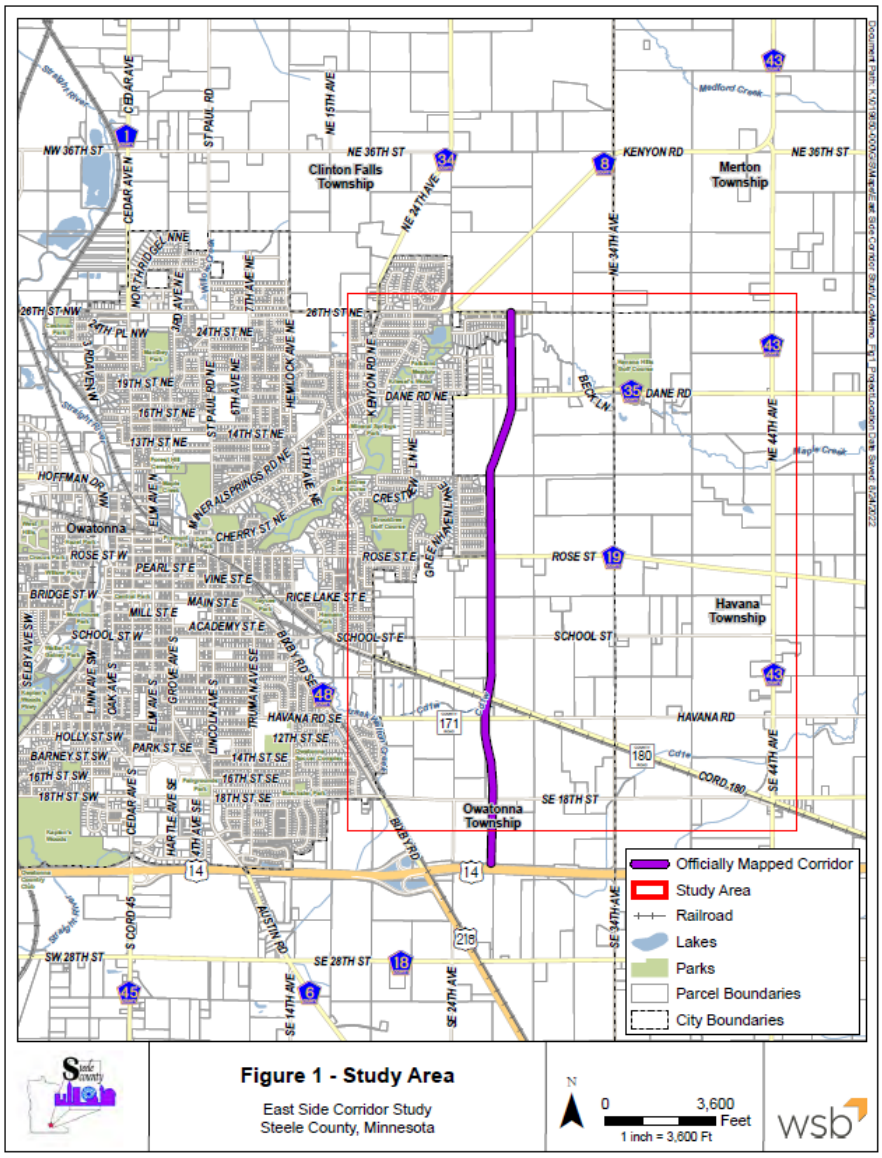
Today, 50 feet of the 150-foot-wide corridor runs through these private, occupied properties. Yet no formal relocation plans, compensation offers, or mitigation strategies have been proposed.

Legal and Ethical Concerns

The Memorandum treats this area as if it remains an active corridor, despite the fact that:

- No right-of-way was recorded or preserved,
- Residents hold legal title to portions of the route,
- And no compensation or eminent domain process has been initiated.

Attempting to reassert use of this land without legal proceedings may conflict with property law and raises serious liability risks for both the city, county, and state.



Internal Awareness—And Withholding of Critical Information

The seriousness of this situation was not publicly acknowledged until November 2023, when North Country residents raised the issue during public comment. Until that moment, County Engineer Greg Ilkka was unaware that the corridor directly overlapped with private homes.

However, the then Assistant County Engineer, Paul Sponholz—who serves as the project lead— had access to the data and mapping that confirmed this direct encroachment. Despite this, he did not disclose the information to the public or to elected officials. Instead:

- He offered assurances that the project would run adjacent to, not through, residential properties;
- He downplayed impacts and stated that mitigation measures such as noise walls were unnecessary;
- He collaborated with WSB to shift publicly released maps 25 feet east—not to change the actual alignment, but to visually reduce perceived impacts on North Country homes.

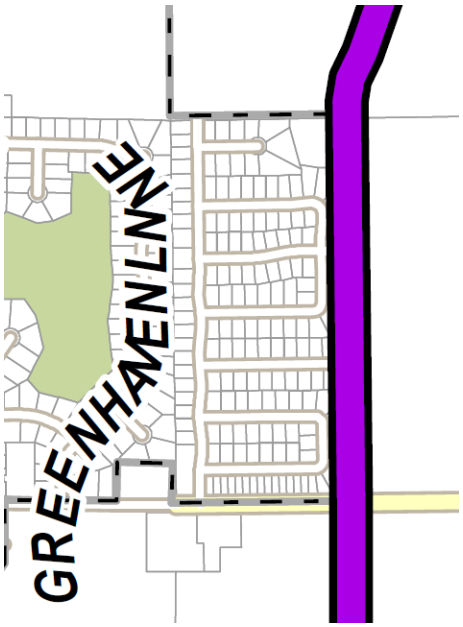
This pattern of omission and misrepresentation undermines the transparency, integrity, and credibility of the entire planning process.

Why This Matters

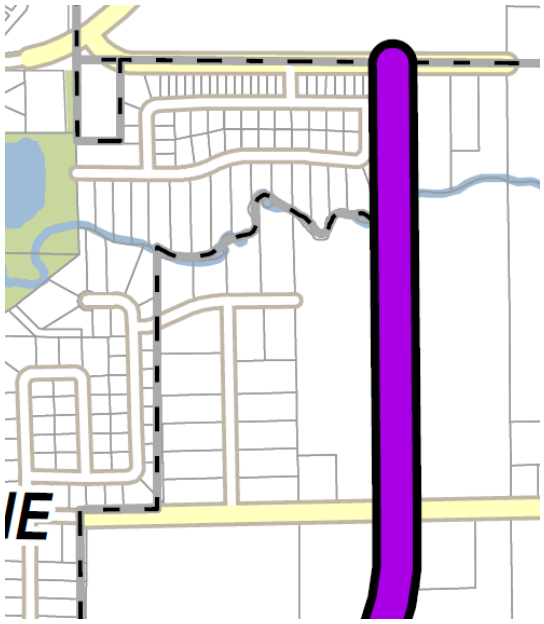
Public agencies are entrusted to act with transparency and prioritize the safety and well-being of residents. In this case:

- The County relinquished its corridor rights in 2004, allowing legal development of homes now directly affected by the project;
- Today's leadership has not fully disclosed these implications to the public or elected officials.

This is more than a technical oversight—it suggests potential negligence, possible misconduct, and certainly a failure of ethical governance.



A closer examination clearly reveals the encroachment affecting North Country residents.



Similar encroachment is observed in the Shady Hills Subdivision, though it involves undeveloped lots.

Unequal Protections: A Tale of Two Neighborhoods

The images below reveal a stark contrast. In Shady Hills, a more affluent subdivision, the route was shifted to protect future development. In North Country—where working-class families already live—no such effort was made. Homes were legally built after the county abandoned the idea of this location, proposed a highway within feet of homes.

This unequal treatment raises serious concerns about transparency, fairness, and the values guiding public decisions. It reinforces existing social and economic divides—and leaves residents wondering if this document fairly evaluated alternative or was written to uphold a predetermined plan.

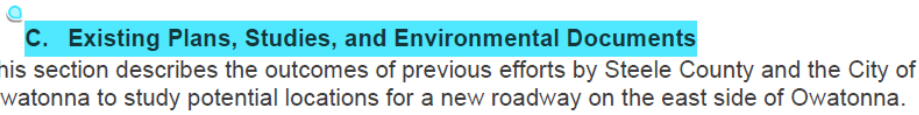
While the corridor still appears on maps, its legitimacy has eroded. Years of abandonment, approved development, and omission of key facts from the Memorandum undermine its legal and ethical standing. Reviving it now risks violating property rights and public trust.

Reviving a corridor through private property that was sold and developed in good faith more than 20 years ago undermines basic legal principles. It violates the public trust and may expose local and state agencies to legal and financial consequences.

Page 19: Past studies

Residents have long pointed to previous Beltline studies to highlight inconsistencies with the current East Side Corridor proposal. In response, officials often claim that past reports no longer apply because "this is a new project with a new purpose."

Yet, the Memorandum selectively relies on those same past studies to justify its current alignment, while ignoring inconvenient findings.



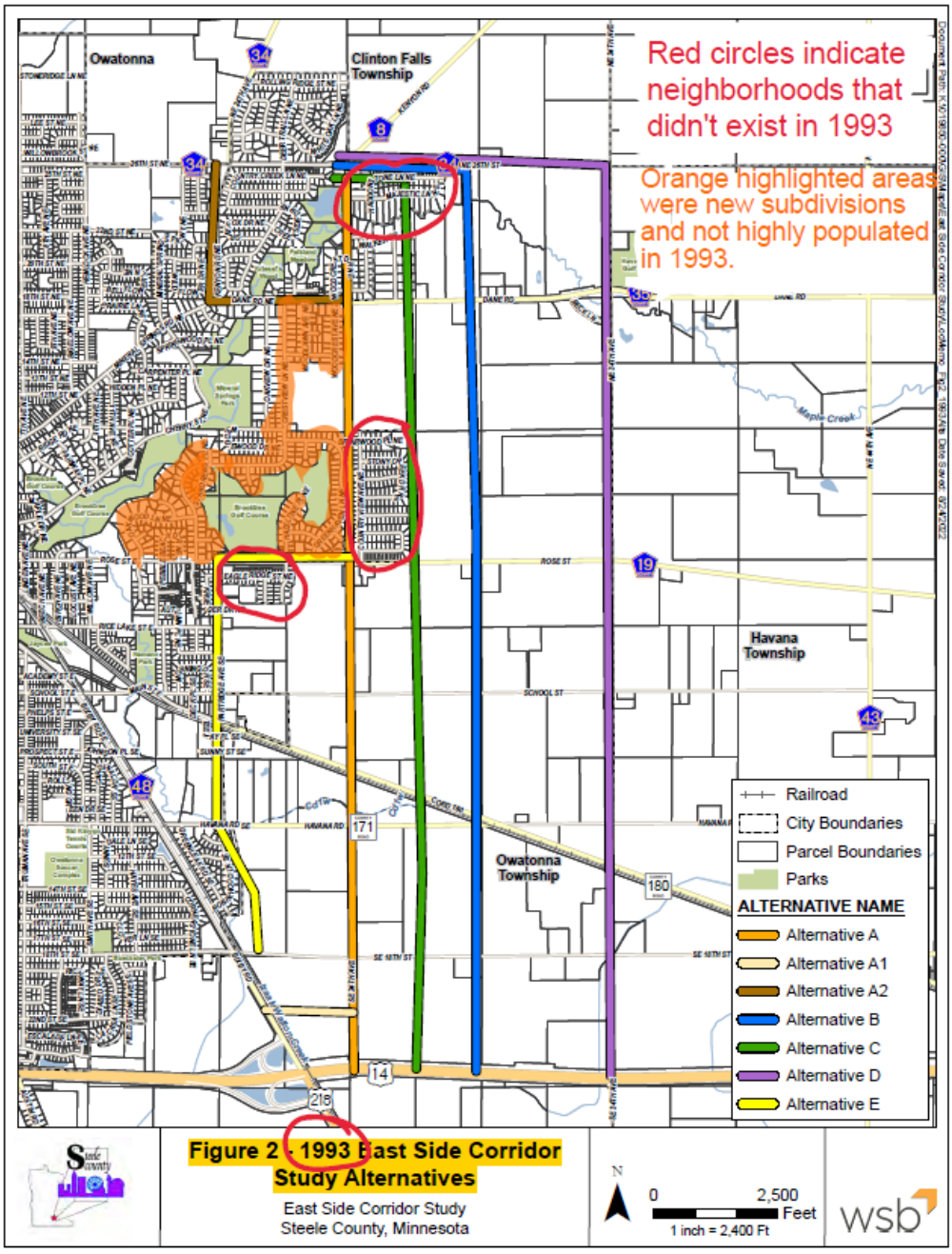
C. Existing Plans, Studies, and Environmental Documents

This section describes the outcomes of previous efforts by Steele County and the City of Owatonna to study potential locations for a new roadway on the east side of Owatonna.

One clear example is the Memorandum's use of *Figure 2*, which is labeled as representing alternatives from 1993. However, the map reflects today's footprint, not the 1993 alignment. This creates a misleading impression that the route was approved decades ago with full awareness of subdivisions that did not yet exist.

1. **Owatonna East Side Corridor Study (1993)**

This study, conducted by the City of Owatonna and Steele County, examined several location alternatives for an east side corridor (**Figure 2**). The primary need for the new roadway was



Figures R3 and R4 (below) show what Owatonna actually looked like in the 1990s.

1995 EA, Page 9: Alternatives Reflective of the 1993 Time Period

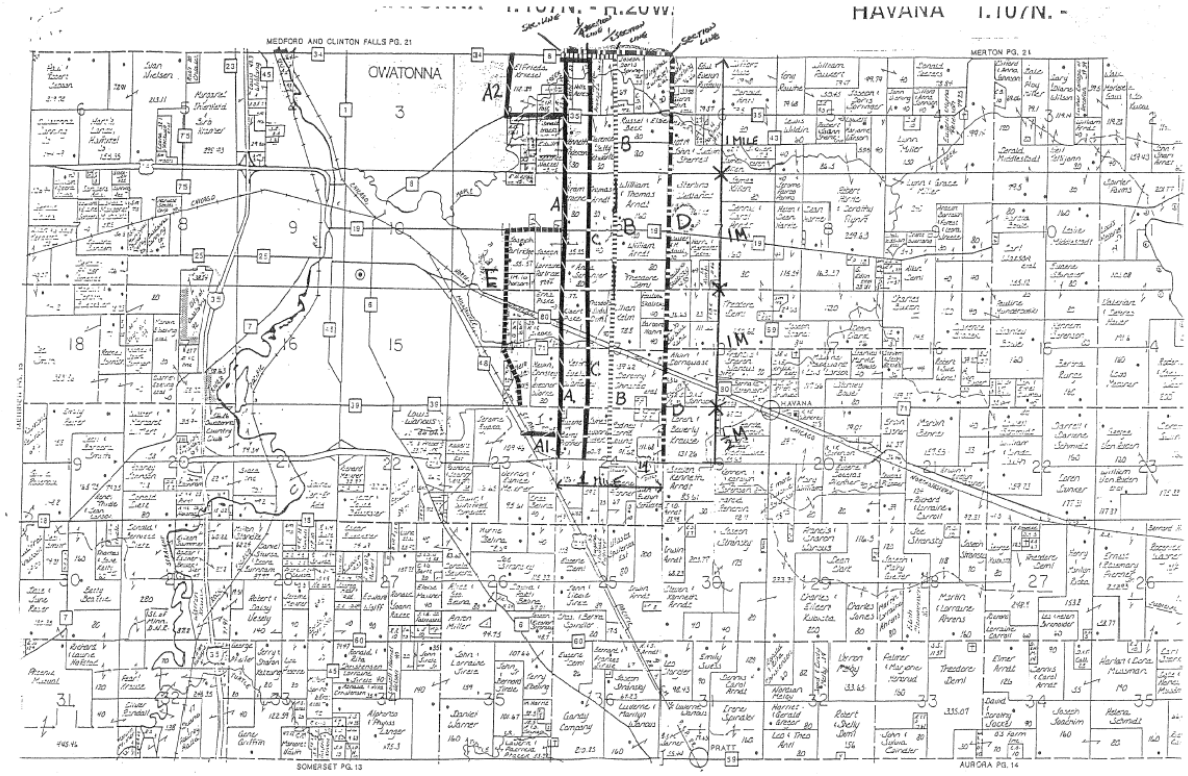


Figure R3: Maps the original 1990s alternatives, all located outside current city limits.

Figure R4: Shows the 1995 landscape; most subdivisions now being impacted—including Greenhaven—were not yet built (red pin marks a current home location).

The Memorandum also mischaracterizes 24th Avenue. On page 3, it states that the corridor is "similar" to the current mapped right-of-way. In reality, 24th Avenue—referred to as Alternative A in the 1990s (Alternative 1 today)—was rejected in the 1995 Environmental Assessment and 1999 EAW due to its proximity to homes and associated noise impacts, the very same impacts today.

As a result, the route was shifted 1,200 feet east—toward what is now Alternative C (Alternative 3/29th Avenue)—and officially mapped in 2000. Despite this, the Memorandum claims 24th Avenue was part of the mapped right-of-way, contradicting the historical record.

> The furthest west of these alignments was Alternative A, which is immediately east of US 218 or along the section line generally aligned with 24th Avenue East. The furthest east (Alternative D) was located at 34th Avenue East, one mile east of Alternative A. Alternative A was selected as the preferred alternative for the 1993 study because it would provide the most immediate benefit to traffic due to its proximity to existing developed areas.
>
> Alternative C most closely matches the officially mapped corridor. The 1993 study outlined several advantages and disadvantages of Alternative C, listed below. Note that several items such as the connection to US 14 are no longer applicable.

Disadvantages to Alternative C: The Memorandum omits 2 additional disadvantages, including deviations around Echo Heights, as seen on official copies of the 1993 report on page 5, shown in Figure R5.

Disadvantages:

1. No existing right of way on north/south segment.
2. Cuts through Schlinger farm.
3. Cuts through 160-acre Wandry farm.
4. Possible wetlands in section 12.
5. Possible conflict with radio tower, may require some adjustment in alignment.
6. Connection to US 14 would be closer to interchange and would require MnDOT permission.

Memorandum Page 16

DISADVANTAGES:

1. No existing right-of-way on north/south segment.
2. Cuts through Schlinger farm.
3. Cuts through 160 Ac. Wandry farm.
4. Possible wetlands in section 12.
5. Possible conflict with radio tower, may require some adjustment in alignment.
6. Connection to T.H. 14 would be closer to interchange and would require MNDOT permission.

7. REQUIRES SOME realignment around Echo Heights houses.

8. SKIRTS A WETLANDS AREA.

Figure R5 – Alternative C Disadvantages from 1993 Study

These discrepancies point to a troubling pattern: selective reliance on historical data when it supports the current plan, and dismissal of that same data when it raises legitimate concerns.

Page 21: 1995 Environmental Assessment (EA)

The 1995 Environmental Assessment (EA) narrowed the project to two corridors—Alternative A and Alternative C—as seen in the conclusions section on page 85 of the 1995 EA (Figure R6). Contrary to the Memorandum's claim that no preferred alignment was identified, these two routes were explicitly carried forward to the 1999 EAW.

Conclusions

The projected growth in the City of Owatonna and Owatonna Township's east side will definitely result in capacity problems on existing City streets if no east side corridor is constructed. The distance of the corridor from existing City boundaries has a distinct impact on the level to which the corridor can relieve projected traffic growth on existing City streets.

Alternatives A and C are superior to Alternatives B and D in their ability to serve projected and existing development and route traffic away from the use of Mineral Springs Road, Rose Street and the downtown area.

Figure R6 – Conclusions section of the 1995 Environmental Assessment

This Memorandum asserts that Alternative C would not impact native prairie. However, page 49 of the 1995 EA highlights significant concerns raised by the Minnesota Department of Natural Resources (DNR) about the contiguous native prairie habitat along County Road 80. Figure R7 illustrates the DNR's concerns regarding this habitat, while Figure R8 confirms that the wetlands affected by this project include vegetation classified as wet prairie.

According to the 1995 plat maps (Figure R9), what is referred to today as County Road 180 or Claremont Road was previously known as County Road 80. Additionally, Figure R10 demonstrates that the native prairie habitat not only runs directly through every proposed corridor but also extends beyond the study area.

In contrast to the claims in this Memorandum, the documentation from the 1995 EA clearly shows that Alternative C does, in fact, affect native prairie habitat.

As I indicated to you on the telephone earlier today, we are very concerned about perpetuation of these rare native species by maintaining native habitats in which they occur. In addition to the location of rare plants on your print-out, we have records for several threatened and rare plant species along County Road 80 east of the project area depicted on your map. There is continuous native prairie habitat along this road. The DNR Roadside Coordinator, Cathy Fouchi, surveyed a portion of the County Road 80 right-of-way on June 2, 1994 and confirmed that several rare plants still occur in the prairie remnants. During the preliminary planning stages of the Owatonna East Corridor, special consideration should be given to protecting any mesic native prairie remnants, which may support these listed and rare species. I recommend that you contact Cathy Fouchi in New Ulm at 507/359-6034 to coordinate protection planning efforts.

Figure R7 – Page 49 of the 1995 EA report detailing the DNR's concerns about prairie habitat.

Wetlands along the DME railroad and C.R. 80 right-of-ways are classified as palustrine emergent with seasonal flooding. The vegetation type is wet prairie.

Figure R8 – Page 40 of the 1995 EA report documenting wet prairie vegetation along County Road 80.

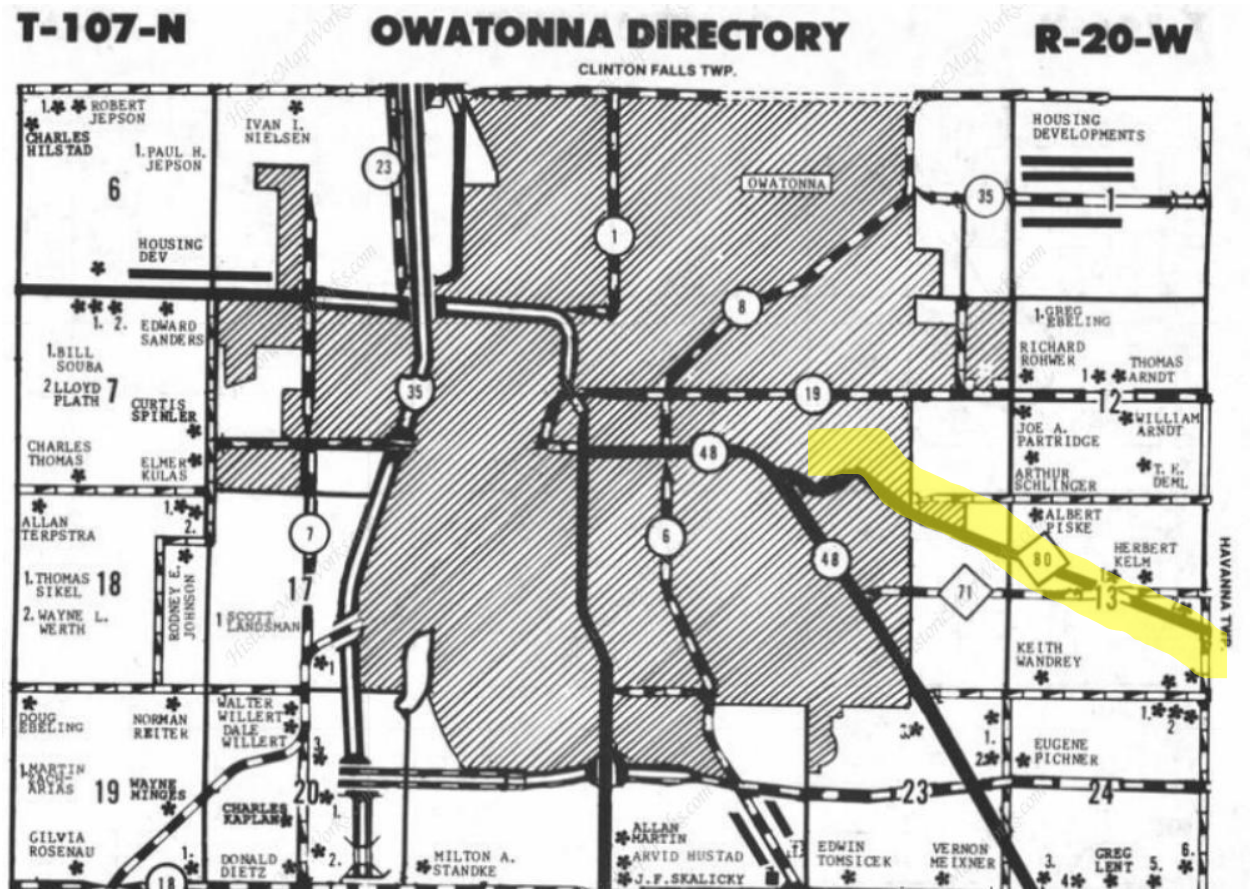


Figure R9 – 1995 Plat Map highlighting County Road 80.

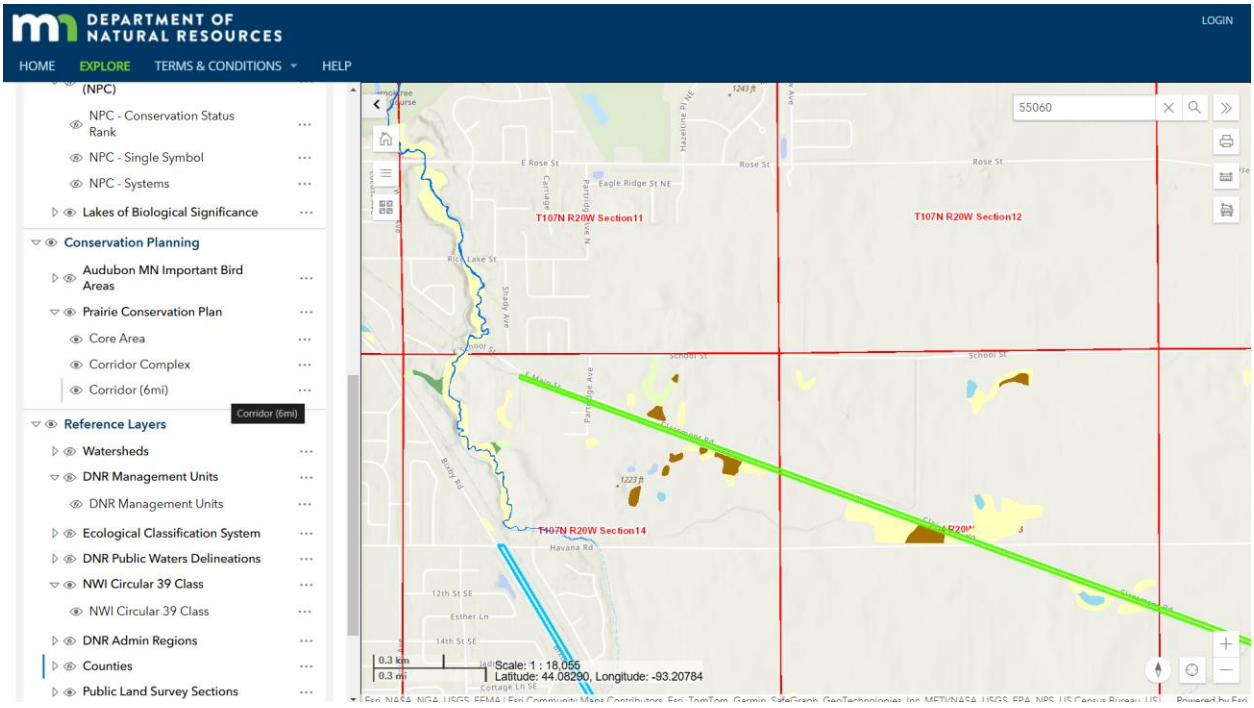


Figure R10 - MN DNR map of prairie wetlands along County Road 180/80.

The Memorandum references an October 18, 1994 meeting as context for route elimination. However, no documentation of this meeting has been made publicly available. When closed-door discussions influence long-term infrastructure decisions, transparency becomes not just ethical—but essential. Why wasn't this documentation made public like other historical reports?

> A public information meeting was held on August 30, 1994. Staff from the Minnesota Department of Natural Resources (DNR), Minnesota Department of Transportation (MnDOT), and the U.S. Soil Conservation Service (SCS) also met on October 18, 1994, to discuss the potential natural resource implications of the project.

While Alternative C was the closest to today's Alternative 3 in following the ¼ section line, the 1995 EA found that it would impact homes on Hill Drive—the only established neighborhood along the route at the time (Figure R11). To mitigate those impacts, the alignment was shifted east, creating a buffer of approximately 1,200 feet from existing homes along the rest of the route.

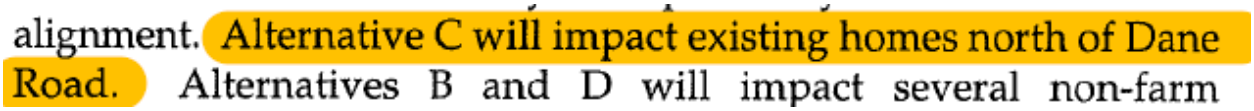

alignment. Alternative C will impact existing homes north of Dane Road. Alternatives B and D will impact several non-farm

Figure R11 – 1995 EA, page 18, noting the impact to existing residents on Hill Drive.

The 1995 EA also examined noise impacts from Alternative A on Greenhaven Lane, which was in the earliest stages of development. As shown in Figure R12, Alternative C was projected to carry nearly as much traffic but with significantly fewer residential impacts—leading to its recommendation over Alternative A.

Notably, this recommendation was based on a neighborhood that was little more than platted at the time. Today, the same concerns apply: the impacts of Alternative A then, closely resemble those of today's Alternative 3 (29th Avenue), while Alternative C aligns more closely with today's Alternative 4, offering similar protective buffers.

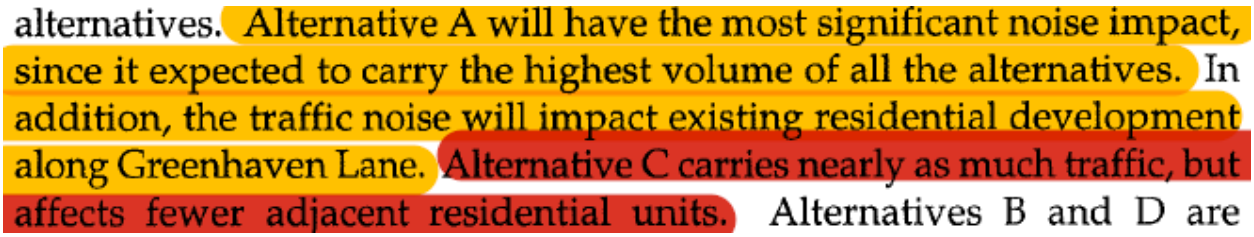

alternatives. Alternative A will have the most significant noise impact, since it expected to carry the highest volume of all the alternatives. In addition, the traffic noise will impact existing residential development along Greenhaven Lane. Alternative C carries nearly as much traffic, but affects fewer adjacent residential units. Alternatives B and D are

Figure R12 – 1995 EA, page 33, noting the residential impacts of routes located too close to residential properties.

The Memorandum does not provide Average Daily Traffic (ADT) projections for any of the proposed routes. While it discusses potential reductions in downtown congestion, no route-specific traffic data has been shared with residents. Instead, the public has been told to expect approximately 5,000 vehicles per day—without any supporting documentation.

This figure sharply contrasts with the 1995 EA, which projected up to 12,000 vehicles per day between Dane Road and Rose Street (Figure R13). Since then, both population and development have grown significantly, making it difficult to reconcile how current volumes would be less than half of what was estimated 30 years ago.

Alternative A itself is expected to have an ADT volume ranging from 3200 just north of T.H. 14 to over 12,000 between Dane Road and Rose Street.

The projected ADT volumes on Alternative C range from 2600 just north of T.H. 14 to over 12,000 between Dane Road and Rose Street.

Figure R13 – 1995 EA, pages 15 and 18, showing ADT estimates.

The 1995 EA included clear recommendations to protect surrounding neighborhoods. As shown in Figure R14, these included: “Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation.” The EA also emphasized creating safety buffers and adding landscaping between homes and the corridor.

At the time, this guidance could have been followed with minimal impact—since subdivisions like North Country and Shady Hills had not yet been developed. Today, those same areas are built out, yet the mapped right-of-way remains unchanged. Instead of acquiring or relocating affected properties, Steele County and the City of Owatonna are moving forward with plans to place a high-speed road within feet of existing homes.

For over two years, residents have stressed the importance of a safety buffer for a successful project, highlighting the dangers of relying on outdated 30-year-old plans that fail to reflect current realities.

Mitigation utilizing enhancement involves selecting feasible and effective "viewshed" considerations for the existing corridor area. The natural harmony, cultural order, and sense of design quality are all important elements.

Mitigation and Enhancement Techniques for Impacts to the Sense of Natural Harmony

- C Allow continued views of open and farmed areas outside of planned development areas;
- C Develop a landscaping plan to integrate the roadway into the surrounding natural and cultural environment;
- C Incorporate proper construction design to achieve the most visually acceptable and functional method for the roadway facility.

Mitigation and Enhancement Techniques for Impacts to the Sense of Cultural Order

- C Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation;
- C Investigate integrated pedestrian areas which will not disrupt use of existing neighboring properties but provide a pleasing, safe passage throughout the project area;
- C Appurtenances, all the non-structural items which are part of the roadway, should be visually coordinated and standardized. This includes signs, rails, fences, wall, berms, lights (if necessary), safety barriers, etc..

Mitigation and Enhancement Techniques for Impacts to the Sense of Design Quality

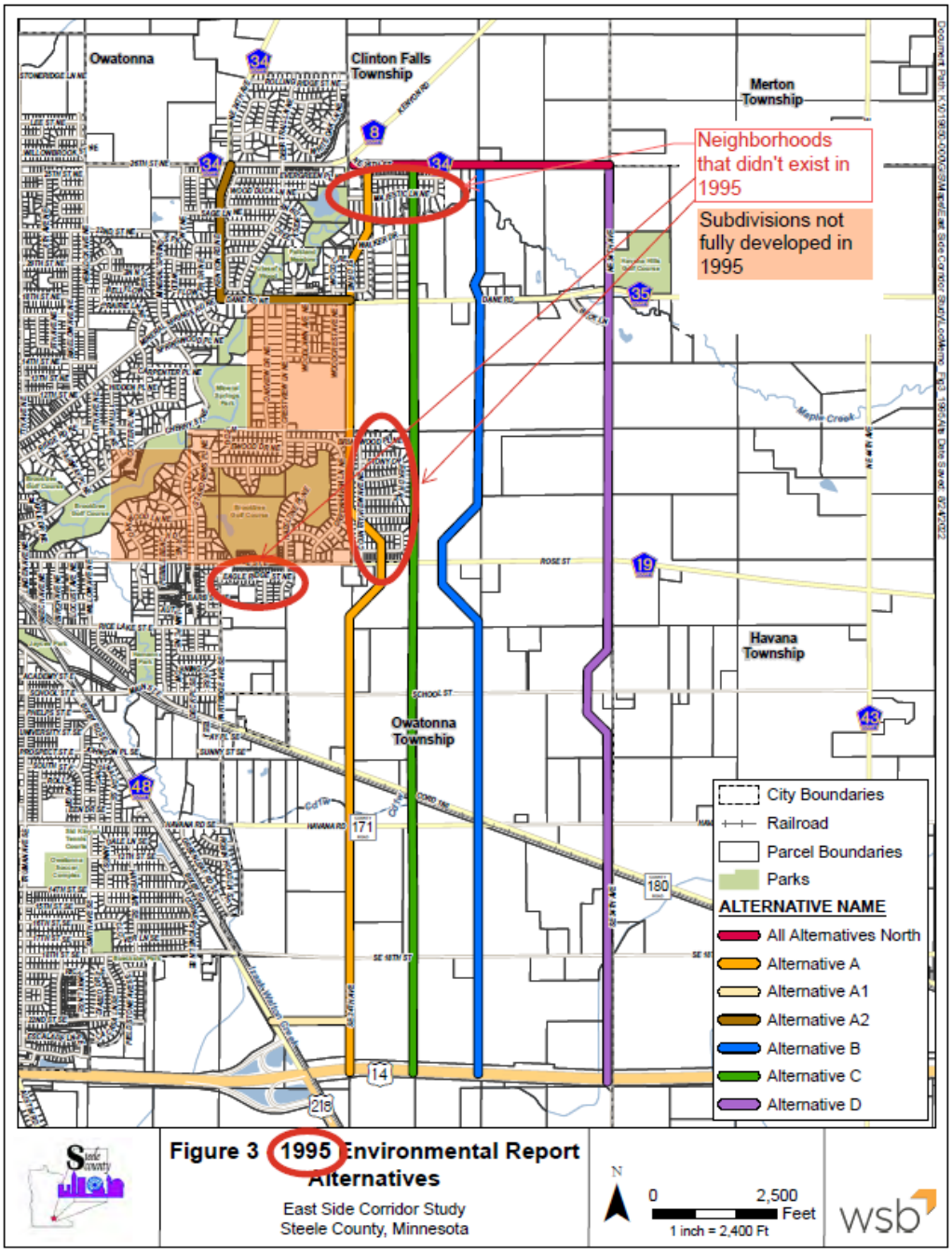
- C Provide a well-defined roadway surface showing continuous horizontal direction and movement;
- C Integrate a landscape plan that is functional and provides a connection in the project corridor;
- C Maple Creek Bridge. This is a key visual resource. The design and construction of the bridge should have features that are sensitive to the local natural and cultural environment. This includes design type, building materials, and colors.

Figure R14 – 1995 EA recommendations for a successful project, as seen on page 28.

Page 22: Inaccurate Landscape Representation and Misleading Data

Page 22 features another map—similar to that on page 20—that inaccurately depicts all alternatives using today's landscape rather than conditions from 1995. These visuals falsely imply that subdivisions now in place existed at the time of decision-making.

This misrepresentation distorts how alternatives were evaluated and misleads readers into believing current developments were part of the original analysis. By presenting modern data as if it informed historic decisions, the Memorandum gives a false sense of due diligence and undermines public trust in the process.



Page 23: 1999 EAW

The 1999 Environmental Assessment Worksheet (EAW) acknowledged that shifting the corridor too far east would reduce its benefits. Still, it explicitly recommended an 800-foot setback and a 150-foot right-of-way to protect existing subdivisions from noise impacts (Figure R15). These figures were not arbitrary—they were selected to comply with Minnesota's noise pollution regulations. This information was omitted from the Memorandum, despite the public addressing it many times.

The design speed of the roadway and the amount of truck traffic will be the most important factors in whether or not he adjacent sensitive receptors will experience noise levels exceeding state and federal standards. The proposed roadway is planned to be separated form existing residences by approximately 800 feet. Landscaped boulevards and berms provide a soft, absorptive surface which helps reduce the amount of noise which reaches the sensitive receptors. The 150 foot right-of-way anticipated for this corridor will provide adequate space to design these absorptive surfaces if necessary.

Figure R15 – Page 11 of the 1999 EAW, highlighting the necessary avoidance measures to prevent noise impacts.

Noise Regulations

The recommended 800-foot setback and 150-foot right-of-way were not arbitrary—they were purposefully selected to reduce noise exposure for nearby residents. In the 1990s, project consultants followed the regulatory principle of "avoid, minimize, mitigate," placing resident safety at the forefront. Today, Minnesota Rule Chapter 7030: Noise Pollution Control serves as a benchmark for appropriate separation between roadways and homes. As shown in Figure R16, municipalities are legally responsible for preventing land use decisions that would result in immediate noise violations.

7030.0030 NOISE CONTROL REQUIREMENT.

No person may violate the standards established in part 7030.0040, unless exempted by Minnesota Statutes, section 116.07, subdivision 2a. Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use.

Figure R16 – Minnesota Noise Pollution Rules: https://www.revisor.mn.gov/rules/7030.0030/

Minnesota Rule 7030.0050 classifies homes, schools, and hospitals as Noise Area Classification 1, where noise cannot exceed 65 dBA for more than 10 minutes per hour or 60 dBA for more than 30 minutes per hour during the day. Nighttime limits are even stricter, set at 55 dBA and 50 dBA, respectively (Figure R17), due to the well-documented health risks of disrupted sleep and prolonged exposure.

Highways—especially truck routes like the proposed East Side Corridor—often exceed 90 dBA, far surpassing legal thresholds. Even typical road noise averages around 70 dBA, which is still above regulatory limits. This is precisely why 1990s consultants placed the corridor over 800 feet from existing homes—a critical buffer now being disregarded, despite repeated concerns raised by residents.

7030.0040 NOISE STANDARDS.

Subpart 1. **Scope.** These standards describe the limiting levels of sound established on the basis of present knowledge for the preservation of public health and welfare. These standards are consistent with speech, sleep, annoyance, and hearing conservation requirements for receivers within areas grouped according to land activities by the noise area classification (NAC) system established in part 7030.0050. However, these standards do not, by themselves, identify the limiting levels of impulsive noise needed for the preservation of public health and welfare. Noise standards in subpart 2 apply to all sources.

Subp. 2. **Noise standards.**

Noise Area Classification	Daytime		Nighttime	
	L_{50}	L_{10}	L_{50}	L_{10}
1	60	65	50	55

Figure R17 – Minnesota Maximum Noise Regulations: https://www.revisor.mn.gov/rules/7030.0040/

Why 800ft?

Figure R18 outlines vehicle classifications over 10,000 pounds—including semi-trucks, school buses, garbage trucks, delivery vehicles, construction equipment, and emergency responders. These heavy vehicles are major contributors to roadway noise, particularly along designated truck routes like the proposed East Side Corridor.

Figure R19, based on MN Rule 7030.1040, shows noise limits for vehicles over 10,000 pounds**,** with Line A applying to those traveling above 35 mph. Even if the road is built at the far edge of a 100-foot right-of-way—leaving just 50 feet of separation—noise levels would still exceed 90 dBA. According to the chart, levels drop to the daytime legal limit of 65 dBA only at distances near 800 feet. This indicates that effective noise mitigation for truck traffic requires setbacks greater than 800 feet.

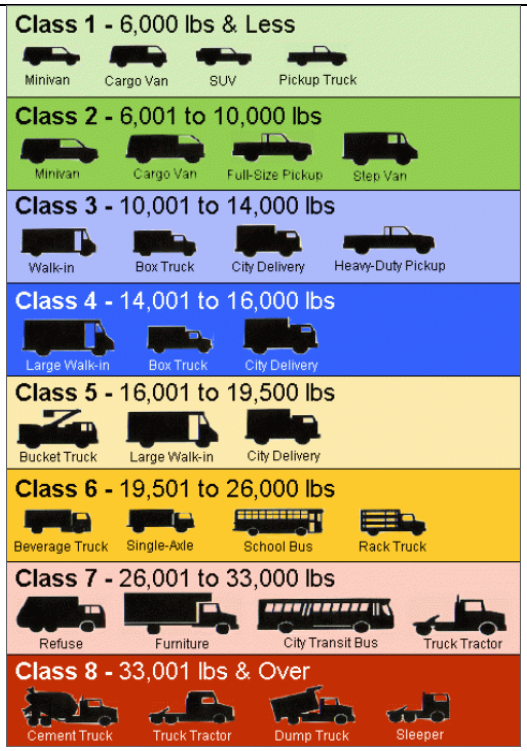


Figure R18 – Vehicle Classifications per the federal Government

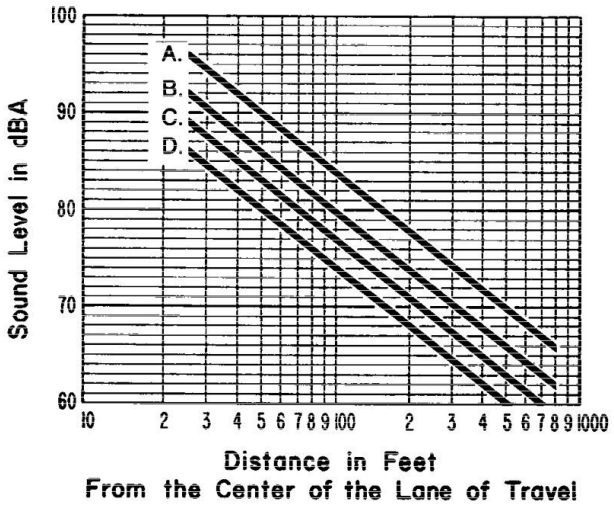


Figure R19 – Noise limits for vehicles over 10,000lbs
https://www.revisor.mn.gov/rules/7030.1040/

How many trucks per hour would exceed the 6-minute noise limit?

At 55 mph, the noise from a single truck lasts roughly one minute before dropping below safe levels. That means just six trucks or buses per hour would exceed the 6-minute exposure limit set by noise standards.

With an Average Daily Traffic (ADT) estimate of 5,000 vehicles and 2.8% classified as trucks, this threshold is already exceeded. Using historical traffic data—closer to 13,000 vehicles per day with 1.1% truck traffic—the limit is still surpassed.

Both scenarios fall short of the quoted 5–15% truck traffic and demonstrate that current setbacks are insufficient. To meet the 65 dBA daytime and even stricter 55 dBA nighttime standards, either truck volumes must be substantially reduced, or setbacks must exceed 800 feet.

What about other vehicles?

Noise concerns extend beyond trucks. Motorcycles and passenger cars also contribute significantly to cumulative exposure.

Figure R20 (Chapter 7030.1050) shows that motorcycles traveling 35 mph or faster can generate up to 90 dBA at a 35-foot setback. At 800 feet, those levels drop to a safer 60 dBA, within daytime legal limits.

Figure R21 shows that even standard vehicles, like personal cars, can exceed noise limits unless a 300-foot buffer is maintained.

With an ADT of 5,000 cars per day, evenly spaced, that's one vehicle every 17 seconds. A car traveling 600 feet at 40 mph takes about 10 seconds, meaning that at least 280 vehicles per hour would generate overlapping noise events.

In effect, passenger vehicles alone would push noise exposure beyond the 30-minute legal threshold, even without truck traffic.

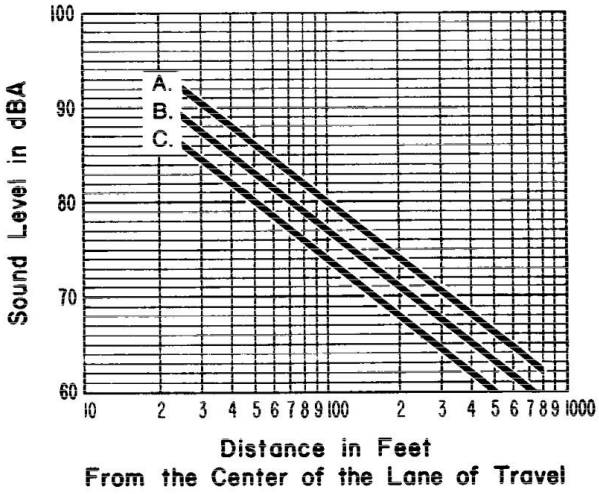


Figure R20 – Noise limits for Motorcycles
https://www.revisor.mn.gov/rules/7030.1050/

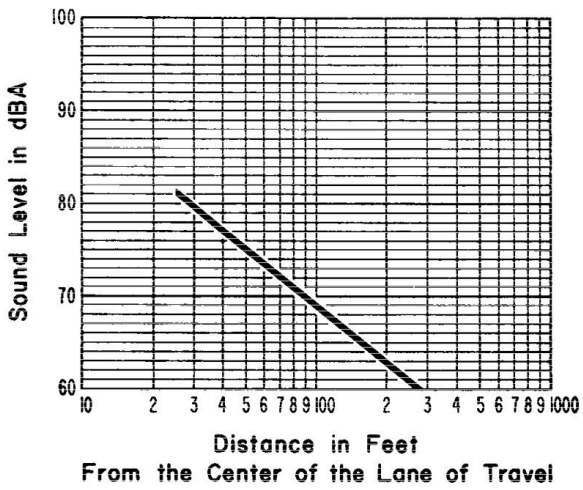


Figure R21 – Noise limits for other vehicles
https://www.revisor.mn.gov/rules/7030.1060/

These findings underscore the importance of aligning the corridor's design with existing noise regulations and maintaining adequate setbacks—especially given its designation as a truck route.

How Noise Affects Outcomes

The health risks of road noise are well-documented—from heart disease and cognitive delays to mental health challenges. These are preventable harms, and setbacks were designed to avoid them. The 800-foot buffer appears to reflect a balanced compromise: offering protection from truck noise (which may require over 1,000 feet) and vehicle traffic (which may require 300 feet), with a focus on public health.

Avoidance remains the most cost-effective and equitable solution. Ignoring these standards now—when communities were protected by them decades ago—leaves today's residents unfairly exposed.

Visual Impact Assessment (VIA)

The 1999 EAW (p.12) concluded that visual impacts, like glare from headlights and streetlights, would not be a concern because the route was set 800 feet from existing residences. This finding came from a Visual Impact Assessment (VIA) conducted during the 1995 Environmental Assessment (see Figure R14

above), which helped confirm the selected alignment. The VIA specifically recommended avoiding proximity to subdivisions, further supporting the need for a route that maintains distance from homes.

Expert Opinions

Page 23 of the current Memorandum briefly references agency concerns—but downplays their seriousness. As detailed on page 25 of the 1995 EAW, the Department of Natural Resources (DNR) warned that the proposed alignment conflicted with Steele County's water plan and posed risks to wildlife and wetlands—concerns that were ultimately dismissed.

The Minnesota Historical Society also raised major concerns, identifying two likely burial sites and warning of disturbance near Maple Creek. To avoid damaging culturally significant areas, the Society recommended limiting construction to locations previously disturbed by roadwork—such as the 34th Avenue corridor (Alternative 5).

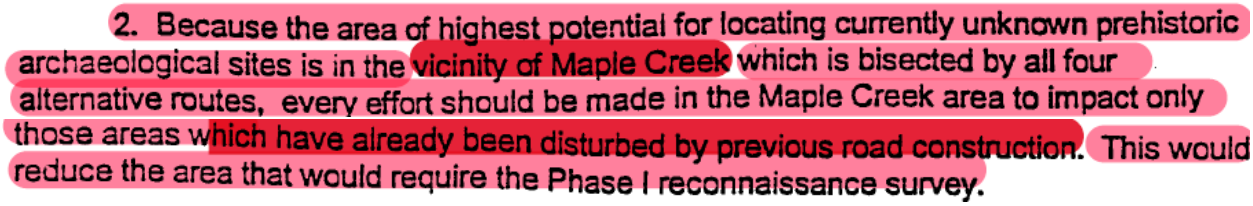

2. Because the area of highest potential for locating currently unknown prehistoric archaeological sites is in the vicinity of Maple Creek which is bisected by all four alternative routes, every effort should be made in the Maple Creek area to impact only those areas which have already been disturbed by previous road construction. This would reduce the area that would require the Phase I reconnaissance survey.

Figure R22 – Minnesota Historical Society's 1999 Recommendation

1999 EAW Findings

Although the 1999 Environmental Assessment Worksheet (EAW) concluded with a negative declaration for an Environmental Impact Statement (EIS), the EAW process itself was never completed. The absence of public comments suggests that final residential input was never collected, and the State of Minnesota has no record of the EAW being formally submitted. These oversights alone justify the need for a new and complete environmental review.

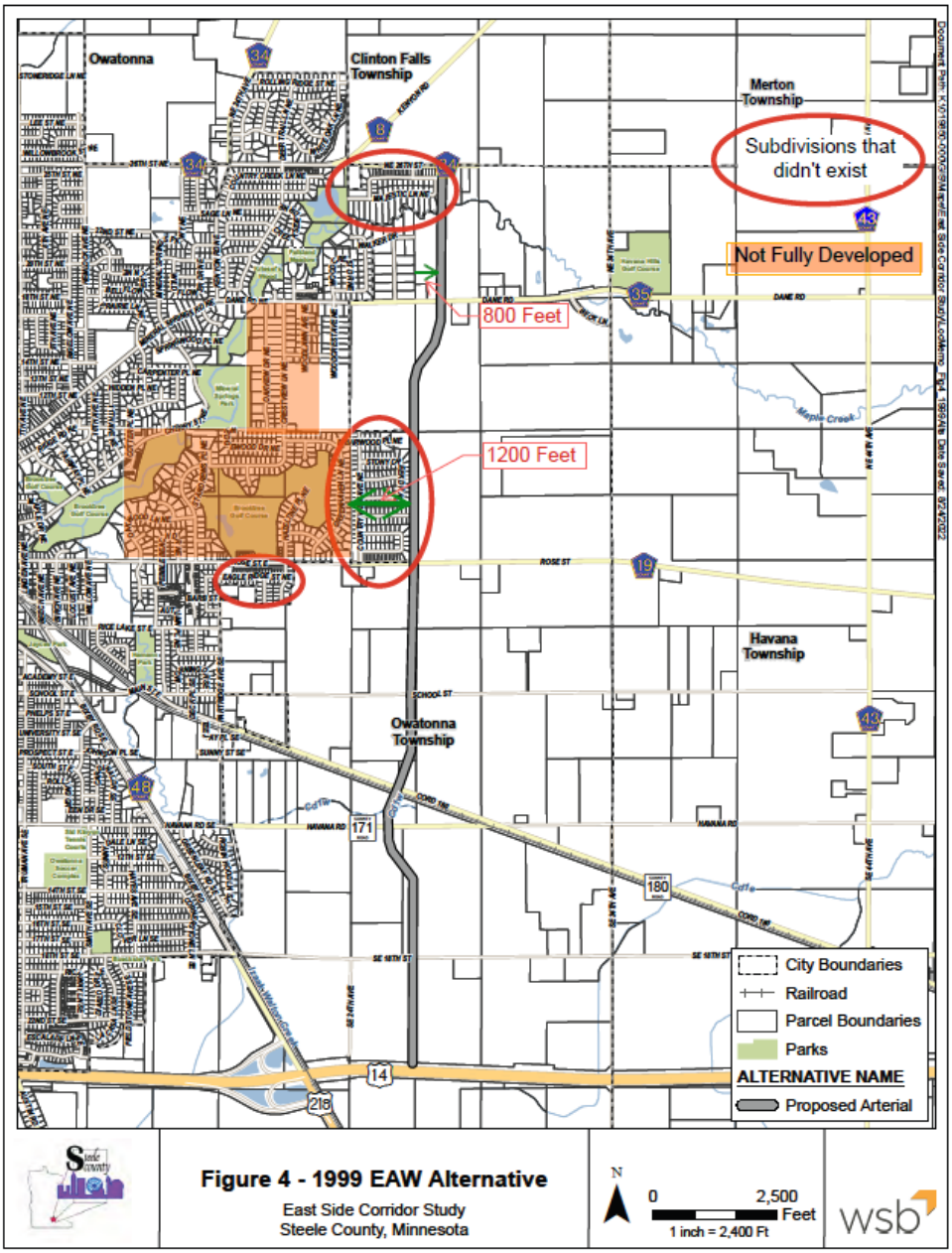
The EAW identified nine key issues, including noise impacts—and proposed a 150-foot right-of-way paired with an 800-foot setback from homes to avoid harm. This reflected a clear strategy of impact avoidance, in line with both environmental and ethical planning practices at the time.

Yet today, the current Memorandum selectively cites the 1999 EAW—leaving out key recommendations like the 800-foot setback and impact avoidance. These omissions distort the project's history and ignore the very measures that once shaped a less harmful alignment.

Page 24: The Mapped Right-of-Way

The 1999 EAW introduced the idea of an officially mapped right-of-way to guide Owatonna's future growth. However, this was only a conceptual map—it did not involve land acquisition or establish legal right-of-way, as repeatedly confirmed by County Engineer Paul Sponholtz.

Despite this, WSB applied the 1999 concept to today's footprint, misrepresenting its original scale and intent. This revision distorted the planned setbacks—originally designed to protect residents and travelers—and was used to justify the current alignment to federal agencies. In doing so, the original goal of minimizing impacts and ensuring safety was undermined.



Page 25: US Highway 14 - Owatonna Beltline Study (2004)

The 2004 U.S. Highway 14 – Owatonna Beltline Study, cited by WSB, recommended against using the previously mapped right-of-way. Instead, it proposed preserving both 34th and 44th Avenues, specifically identifying 34th Avenue (Alternative 5 today) as an ideal "internal collector"—the very function now assigned to the East Side Corridor. This is the only study to recommend an inner corridor; earlier reports focused solely on a "beltline".

Despite this, officials—including the County Engineer, Commissioners, City Council, and Administrator—continue to claim that "this is a new road with a new purpose," invalidating prior reports. Yet, these same studies appear to be the foundation of current recommendations.

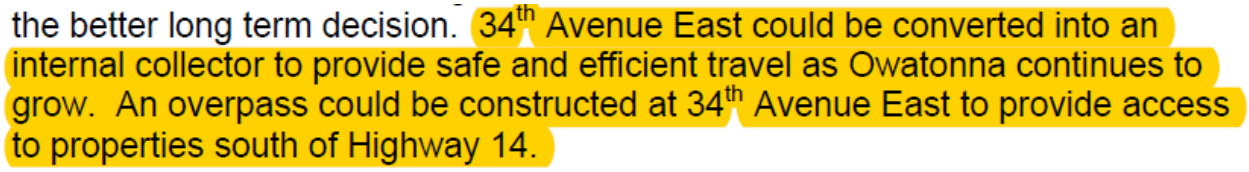
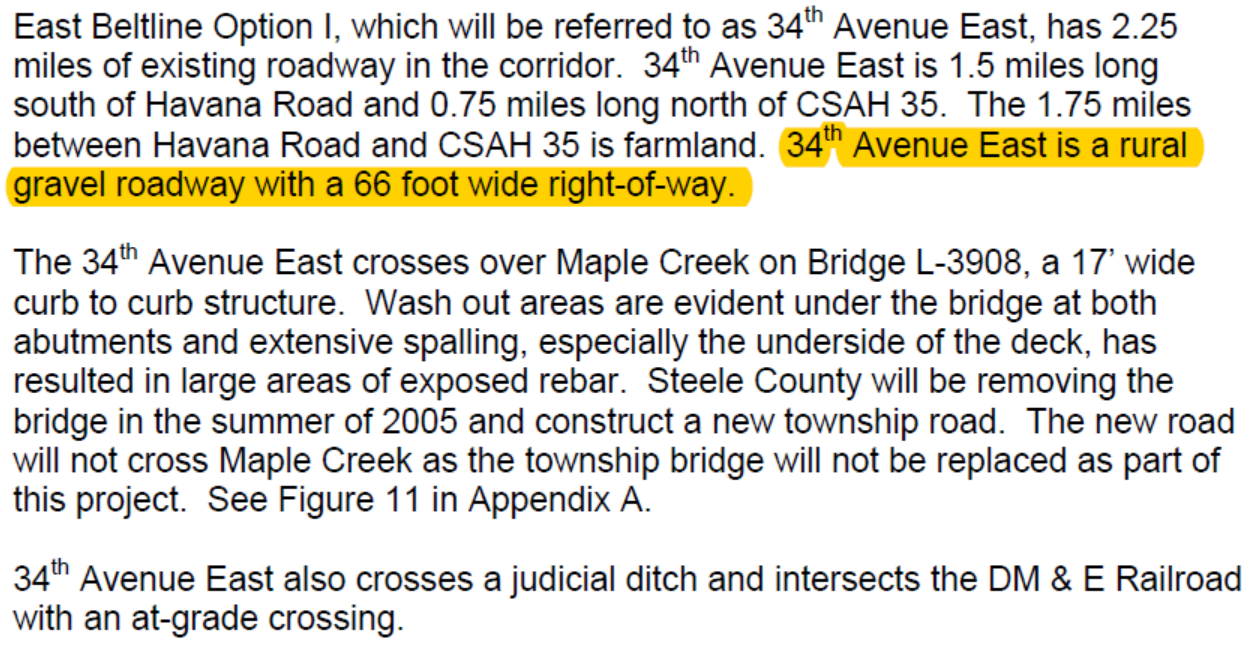

the better long term decision. 34th Avenue East could be converted into an internal collector to provide safe and efficient travel as Owatonna continues to grow. An overpass could be constructed at 34th Avenue East to provide access to properties south of Highway 14.

Figure R23 - *US Highway 14 - Owatonna Beltline Study (2004):* Recommendation for 34th Avenue to serve as an inner collector (Page 30, Recommendations).

The study also noted that 34th Avenue (Alternative 5 today) was an existing gravel road with a 66-foot right-of-way (Figure R24). A historical bridge once spanned Dane Road, but the bridge sustained significant damage and was removed around 2005, as noted in Steele County Board Meeting Minutes. After its removal, nearby farmer, Mark Rypka, tilled under the road—explaining its current absence. He publicly confirmed this during the May 31, 2023 open house. Historical records, including Figure R25, show the road existence as early as the 1930s, and Figure R24 confirms the presence of at-grade railroad crossing, reducing the need for additional crossings. Public support for using 34th Avenue (Alternative 5 today) dates back to at least 1993, as consistently documented in comments and prior studies.


East Beltline Option I, which will be referred to as 34th Avenue East, has 2.25 miles of existing roadway in the corridor. 34th Avenue East is 1.5 miles long south of Havana Road and 0.75 miles long north of CSAH 35. The 1.75 miles between Havana Road and CSAH 35 is farmland. 34th Avenue East is a rural gravel roadway with a 66 foot wide right-of-way.

The 34th Avenue East crosses over Maple Creek on Bridge L-3908, a 17' wide curb to curb structure. Wash out areas are evident under the bridge at both abutments and extensive spalling, especially the underside of the deck, has resulted in large areas of exposed rebar. Steele County will be removing the bridge in the summer of 2005 and construct a new township road. The new road will not cross Maple Creek as the township bridge will not be replaced as part of this project. See Figure 11 in Appendix A.

34th Avenue East also crosses a judicial ditch and intersects the DM & E Railroad with an at-grade crossing.

Figure R24 - US Highway 14 - Owatonna Beltline Study (2004) highlights the existence of a right-of-way along 34th Avenue (Alternative 5 today).

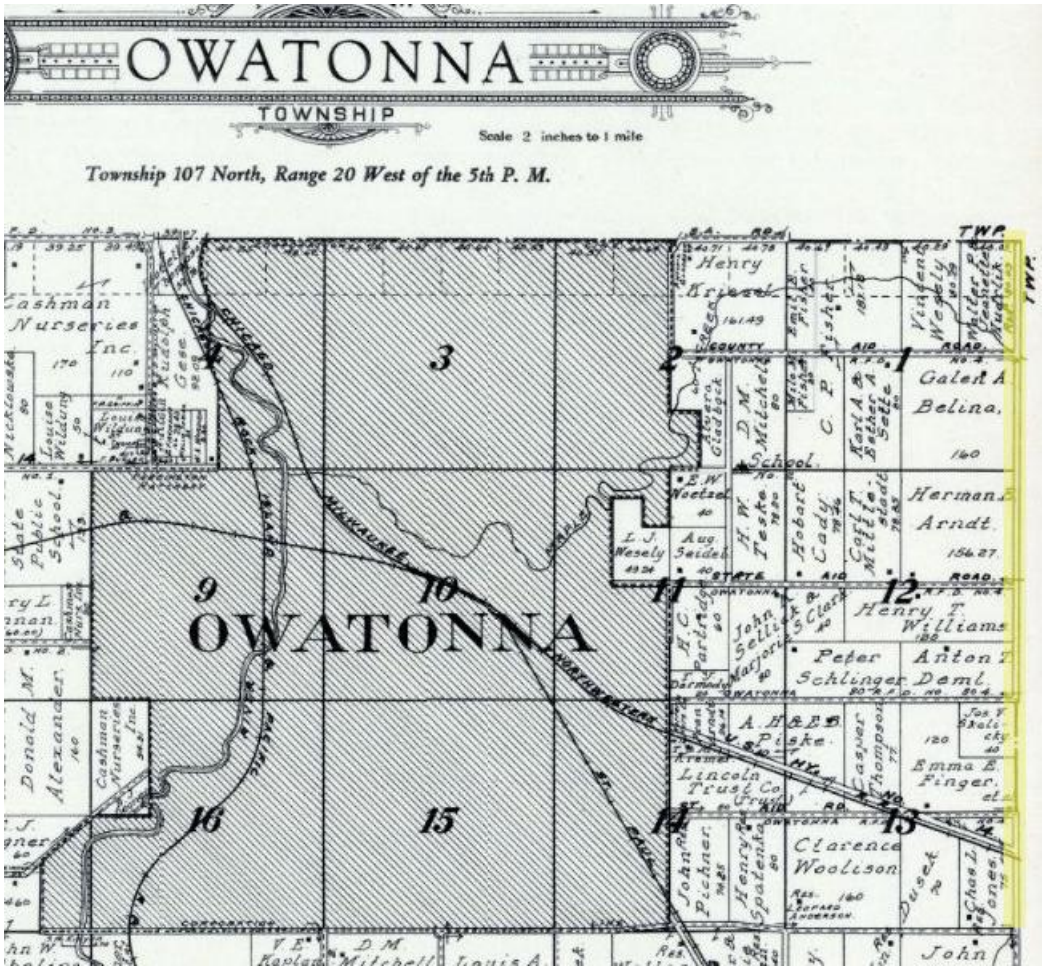


Figure R25 – *1937 Central Atlas Co.* plat of Owatonna Township showing 34th Avenue (Alternative 5).

Historical records, including a 1937 plat map, confirm that 34th Avenue (Alternative 5 today) existed long before it was tilled under. More importantly, Steele County is documented as owning 18 acres of the necessary right-of-way (Figure R26). This isn't just a mapped idea—it reflects actual land ownership. Unless the land was sold—an event for which no record exists in county archives—it is reasonable to conclude that Steele County still owns the corridor.

Although the 34th Avenue East option would require approximately 91 acres, approximately 18 acres are already owned by Steele County. An additional 73

Figure R26 - *US Highway 14 - Owatonna Beltline Study (2004):* Page 13 of the study documents Steele County's ownership of 18 acres along 34th Avenue (Alternative 5).

This 2004 study also emphasized maintaining sufficient setbacks to avoid the need for noise walls. In line with the 1995 report, subdivisions were planned with 800+ foot buffers to reduce noise impacts. In contrast, this current plan proposes a right-of-way just 100 feet wide—placing the road only 17 feet from homes in the North Country Subdivision. Despite this proximity, officials have told residents they do not plan to build a noise wall, even though it may be required.

Page 25: Future Transportation Plans

On March 9, 2004, the City of Owatonna and Steele County entered into a Joint Powers Agreement to preserve the mapped right-of-way. This agreement granted the first right of purchase or refusal and a six-month contention window should a permit be requested. However, six months after this agreement, the first house was built **ON** the mapped right-of-way without contention. The City and County failed to preserve this mapped right-of-way and now residents are being asked to bear the consequences.

Subsequent planning documents—the 2006 Owatonna Development Plan and 2005–2025 Steele County Transportation Plan—showed major shifts from the original mapped route (Figure R27). New roads like 34th and 44th Avenues were proposed, while the original corridor was shortened and buffered from the North Country Subdivision aligning more closely with Alternative 4 than Alternative 3. These updates reflect the abandonment of the original corridor concept and a shift toward lower-impact alternatives.

The Steele County 2005-2025 Transportation Plan even included a connection between Dane Road and Rose Street—designed *with* North Country in mind, as it was already platted. Residents reasonably relied on that plan when choosing to live there. It influenced both their decisions and the subdivision's layout—none of which contemplated a return to a long-abandoned corridor.

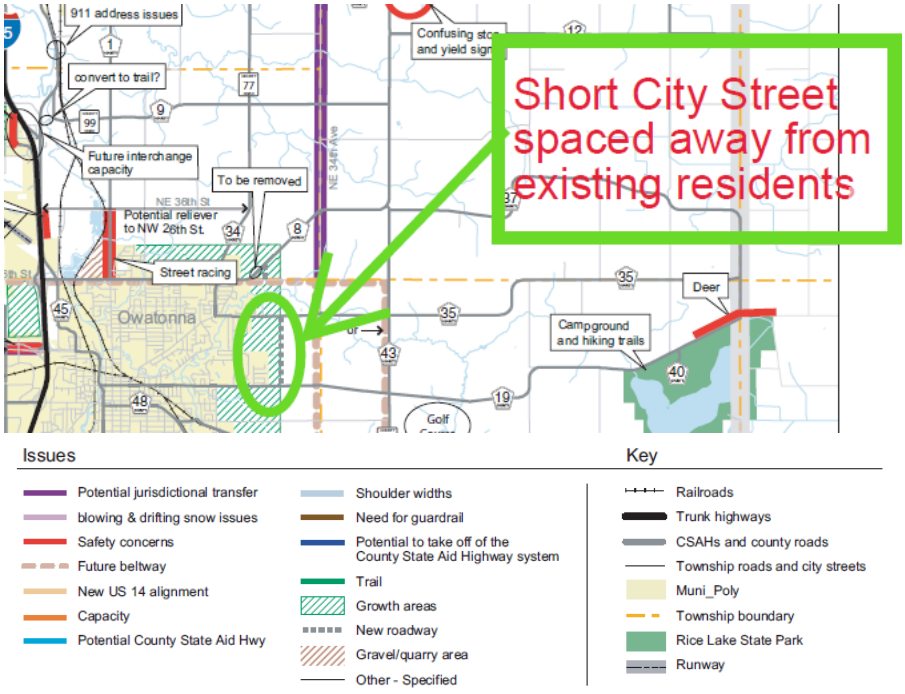


Figure R27 – The *2005–2025 Steele County Transportation Plan* illustrates planned growth between the North Country Subdivision, in its early stages of development, and a shorter proposed roadway.

Page 25: 2011 Beltline Study

The 2011 Beltline Study—completed by WSB—designated 44th Avenue as the preferred beltline route, later incorporated into the 2021 Highway 14 expansion. Yet, despite more than 30 years of planning, the beltline remains unfinished. Meanwhile, 34th Avenue (Alternative 5 today)—mapped as a 150-foot right-of-way and intended to serve as an inner collector—remains unobstructed. This stands in contrast to the previously mapped (29th Ave) corridor now being revived, which has long since been developed and compromised. WSB's current support for that route, despite their prior recommendation, raises serious concerns about the consistency and credibility of the planning process.

Page 28: Steele County 2040 Transportation Plan (2021)

Several issues in the Steele County 2040 Transportation Plan and related documents raise concerns about transparency and process integrity.

Memorandum Claim:
The community expressed support for County ownership of the new 29th Avenue during public meetings, listening sessions, open houses, and survey responses.

Concerns:
The Plan was adopted on July 13, 2021, but the first East Side Corridor open house wasn't held until July 21, 2022—over a year later. That open house had just two days' notice in the local paper and postcards arrived only days before. This timeline calls into question how "community input" was gathered for support of 29th Avenue prior to public engagement. In fact, residents have expressed concerns and opposition consistently since that first open house.

Memorandum:
The 29th Avenue project will reduce traffic on CSAH 45 and Mineral Springs Road and is supported by prior beltline and east-side corridor studies.

Concerns:
No studies have been presented to support this claim. The Memorandum itself was the first to share data and showed that only ~800 vehicles might be diverted from a single intersection—saving less than two seconds per trip. It also showed no traffic relief for CSAH 45. The claim of broader congestion relief is not substantiated.

New Development
The Memorandum notes new developments but omits critical details: both the North Country and Shady Hills subdivisions were built directly over the originally mapped right-of-way. Instead of initiating eminent domain, the Responsible Government Unit (RGU) narrowed the project area to 100 feet, leaving just 17 feet separating it from existing homes. This is a drastic departure from the 800-foot setback and 150-foot right-of-way originally recommended to minimize noise and visual impacts fails to provide the safe, cohesive travel experience that was initially planned (Figure R15).

Completely omitted from the Memorandum is the Joint Powers Agreement (https://www.owatonnaeastsidecorridor.com/downloads/05jointPowersagreement.pdf), signed on March 9, 2004, which aimed to preserve land for a future right-of-way. The agreement granted first right of refusal, first right of purchase, and a six-month contention window. Just six months later, the first home was built on that mapped right-of-way with no objection. Homes have continued to be constructed on this alignment without contention since (as seen in Figure R2)—reinforcing the abandonment of the corridor concept by both the city and county. No formal right-of-way or easement was ever recorded—only a conceptual alignment.

State and federal regulations require that projects avoid adverse impacts whenever feasible, followed by minimization and mitigation. The Memorandum itself acknowledges that Alternative 4 would offer the same benefits as Alternatives 2 and 3—making avoidance entirely feasible in this case. Yet, despite clear opportunity and regulatory guidance, the RGU has ignored this safer alternative. The safeguards that were designed to protect residents have been abandoned, and the consequences are now being unfairly shifted onto existing communities.

As noted in the Memorandum, The East Side Corridor will primarily serve future developments between the current boundary and 34th Avenue (Alternative 5), offering minimal benefit to existing neighborhoods. Alternative 4, which aligned with traffic needs and regulatory standards, was dismissed despite meeting stated goals. CSAH 45 and 48 traffic relief remains unproven.

Next Steps

"This ongoing study will also build on potential impacts identified in previous studies and consider efforts to avoid, minimize, and mitigate these impacts."

On October 14, 2024, residents asked whether avoidance would be included in the Environmental Assessment Worksheet (EAW). As of January 2, 2025, no answer has been given. The County Engineer had previously stated all regulations were being followed—but the earlier EAW had already recommended a route over 800 feet from homes. That should have been reflected in this Memorandum.

In November 2023, County Engineer Greg Ilkka admitted he didn't know homes had been built on the mapped right-of-way—despite residents raising the issue since July 2022. (See Figure R2.)

Residents have also offered compromise routes to reduce impacts. None have been considered. This lack of transparency and participation continues to erode public trust in the process.

Conclusion: Selective History Used to Justify a Preselected Route

Chapter 1 illustrates how selective historical interpretation has been used not to inform the best solution—but to validate a predetermined outcome. Rather than building on the full context of decades of planning, previous studies, and public feedback, this process has cherry-picked facts that support a specific route while ignoring key findings that emphasized avoidance, safety, and long-term cost savings.

The original intent of the mapped right-of-way, the 800-foot setbacks to prevent noise and visual impacts, and repeated recommendations for inner collectors like 34th Avenue (Alternative 5) have all been downplayed or omitted. Meanwhile, today's planning documents present a distorted narrative—one where current development patterns appear to have guided the process from the start, even when those developments conflict with previous plans.

This selective use of history paints an incomplete and misleading picture, one designed to rationalize building within 17 feet of existing homes instead of organically identifying the most balanced and responsible alternative. If the goal is truly to develop the most cost-effective, least harmful, and community-centered solution, the process must embrace the full scope of historical data and resident concerns—not rewrite them to justify an already-made decision.

Chapter 2: Traffic Studies and New Information

The second chapter of the Memorandum focuses heavily on travel time, trip length, and congestion relief to justify the preferred alternative. However, the data used to support these conclusions is riddled with inaccuracies, biased assumptions, and questionable calculations—many of which contradict basic math or exclude more favorable alternatives. These errors raise serious concerns about whether this analysis was designed to explore all viable routes fairly, or merely to validate a predetermined outcome.

Page 34: Appendix C: Connectivity and Travel Times

Emerging Inaccuracies and Misleading Assumptions

Several issues undermine the credibility of the travel time data used to justify the preferred route:

- **Four of six modeled routes use incorrect distances**, which directly skews travel time calculations. While travel time can vary, distance is a fixed metric and should not be misrepresented.

Motor Vehicle Trip Length/Distance (in miles) and Travel Time (in minutes) between Origins and Destination)

		Destinations		
Existing	Origins	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
	26th St NE & Kenyon Rd	10 min/4.5 mi	10 min/3.9 mi	not served by any ESC alternative
	Country View Ave & Fox Hollow Ln	7 min/3.5 mi	10 min/3.7 mi	11 min/4.9 mi

- Actual measurements show:
  - 26th St. to Hy-Vee: 4.1miles, 11minutes
  - Countryview & Fox Hollow Ln to Owatonna High School: 3.7miles, 8 minutes
  - Countryview & Fox Hollow Ln to Hy-Vee: 3.9miles, 11 minutes
  - Countryview & Fox Hollow Ln to the hospital: 5.1mi, 12 minutes

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

Figure R28 – Accurate times and distances based on google from WSB designated points

- At the May 30, 2023 open house, WSB representative Jack Corkle dismissed resident concerns that the East Side Corridor would not improve travel times, stating that such concerns were merely "opinions" and that tools like Google Maps were not reliable for calculating accurate distances or times. Ironically, the travel times and distances presented in the Memorandum are based on Google Maps data—the very tool residents were told was insufficient.

These discrepancies call into question the accuracy of the data submitted to government agencies in support of the East Side Corridor.

When accurate distances and times are used a different picture emerges

When proper distances are applied, the perceived advantage of Alternative 3 nearly disappears. In fact, the time difference between Alternatives 3 and 4 is reduced to mere seconds on the one route—and even then, that route primarily benefits those who are now asking for the road to be moved farther from their homes. Most North Country residents will likely continue using their existing routes to reach destinations like Hy-Vee, regardless of which alternative is selected.

Residental Analysis of Connectivity Data for Alts 3 and 4

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi
	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi	14 min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi	10 min/4.2 mi	10 min/5.4 mi
	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi	14 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi	11 min/4.6 mi	11 min/6.0 mi
	faster than existing			
	similar/shorter distance			
	slower than existing			

Figure R29 – Connectivity Comparison data for Alternatives 3 and 4 with accurate distances and time.
(Note: assuming Alternative distances and times are accurate for this comparison)

Based on accurate distances:

- **Alternative 3**: 2 routes are faster, 2 are similar, 1 is longer.
- **Alternative 4**: 2 routes are faster, 1 is similar, 2 are longer.

Compare this to WSB's claims:

- **Alternative 3**: 1 route faster, 3 similar, 1 longer.
- **Alternative 4**: 1 similar, 4 longer.

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi	14 min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi	10 min/4.2 mi	10 min/5.4 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi	14 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi	11 min/4.6 mi	11 min/6.0 mi

Even WSB's own data is inconsistently applied. For example, the route from 26th St & Kenyon Avenue to the high school shows a 10-minute travel time for both Alternatives 3 and 4. Yet Alternative 3 is highlighted yellow (labeled "similar/shorter distance"), while Alternative 4 is highlighted red (labeled "slower than existing").

This selective framing creates the illusion of a more significant difference between the alternatives than actually exists.

	Origin	Owatonna High School/US 14 & US 218 Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi

Corrected Distances Reveal Key Misrepresentations

- Alternatives 3 and 4 perform more similarly than reported, with both offering two faster routes, not just one.
- Neither alternative significantly improves access to Hy-Vee, rendering that metric largely irrelevant.
  Alternative 4 presents fewer residential impacts, making it the more responsible and community-focused choice.

Real-World Travel Patterns Overlooked

WSB and Steele County assert that the East Side Corridor is needed to reduce traffic through downtown. However, no surveys were conducted to determine whether the intended users—such as residents of North Country—actually use downtown routes or alternative paths.

In contrast, residents conducted a small informal poll that revealed the majority of North Country residents already avoid downtown—even if it means taking less direct routes—in order to bypass congestion. This behavioral insight was overlooked by both WSB and the County Engineer.

The following exhibits compare:

- Google's recommended routes, including distances and travel times, and
- The routes residents actually use, which often prove faster in real-world conditions than Google's estimates.

For example, the route from Countryview & Fox Hollow to the hospital typically takes just 9 minutes via Greenhaven Lane, a path not reflected in the project's analysis.

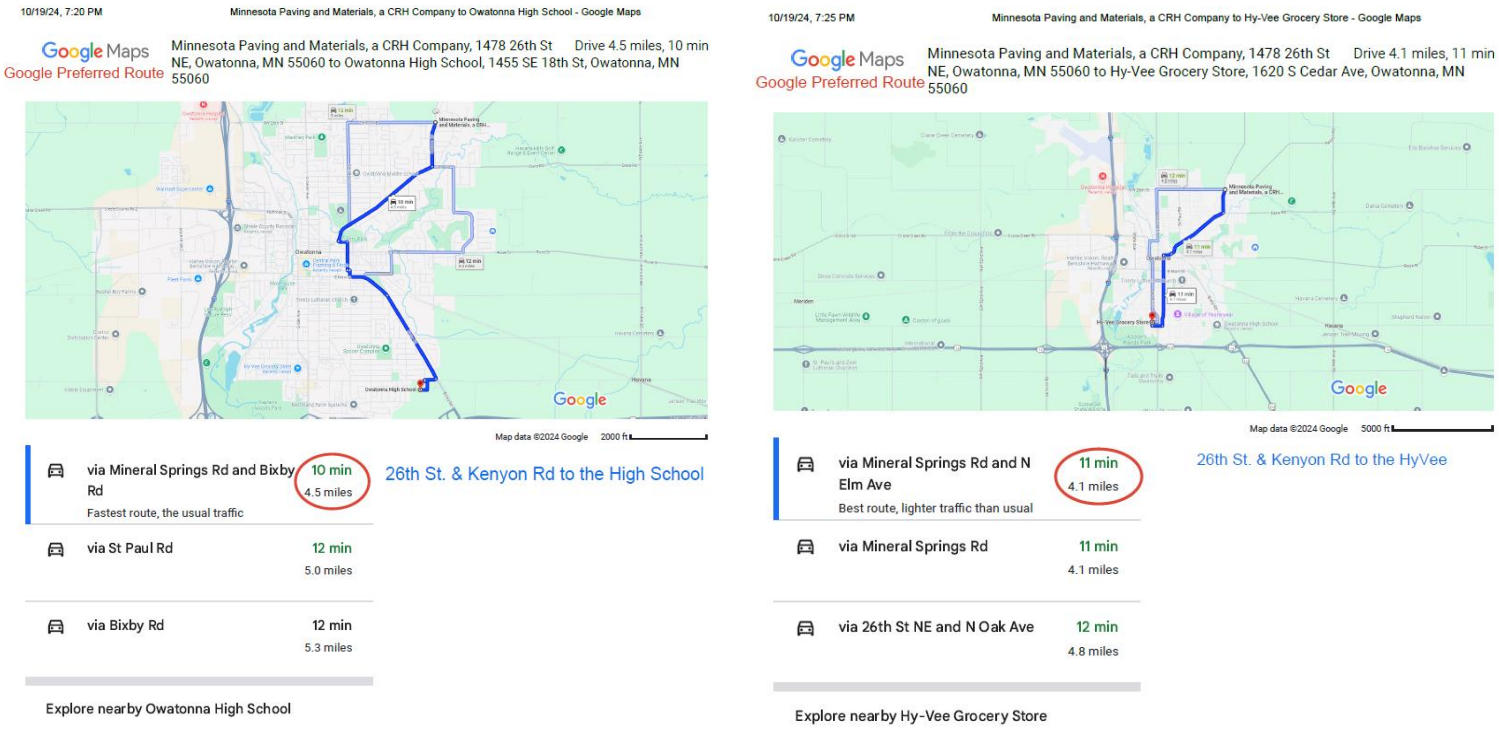


Figure R30 – 26th St. & Kenyon Rd to destination points

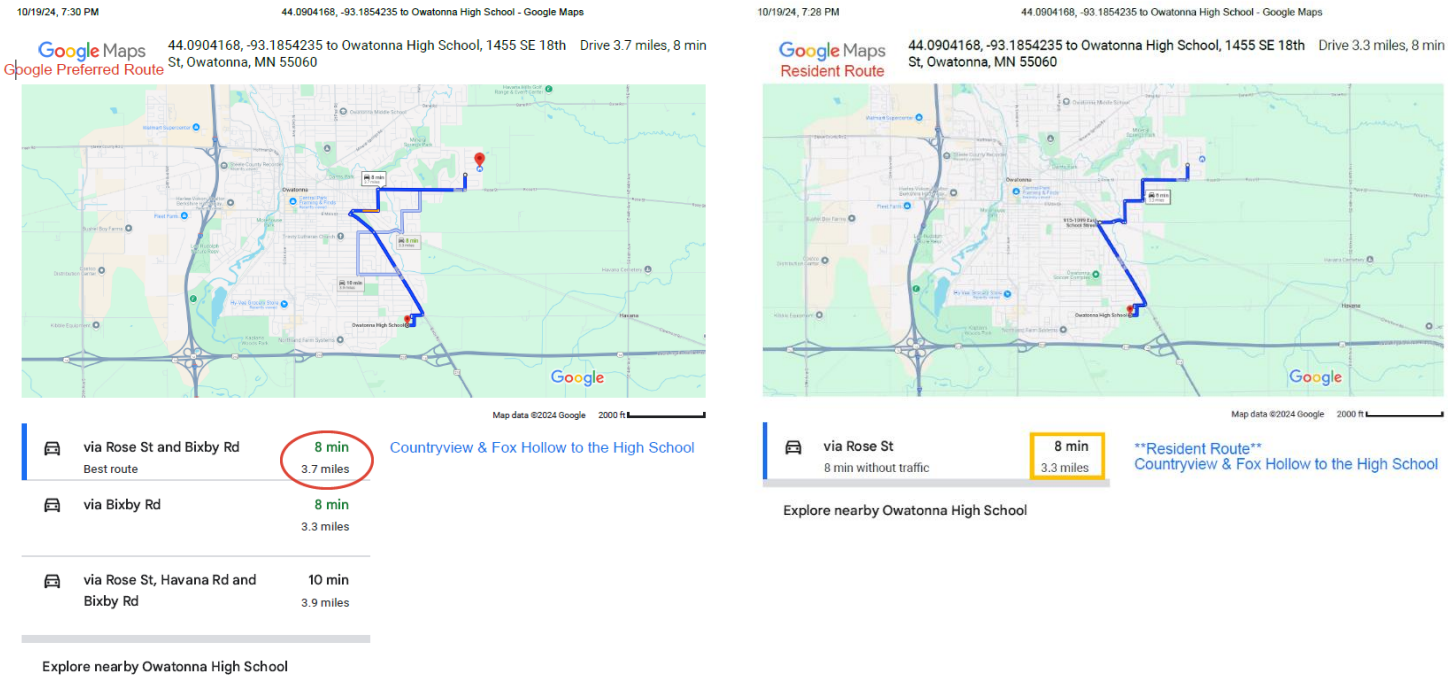


Figure R31 – Countryview & Fox Hollow Ln to the High School Google Recommended Route (left) 3.7 miles and Resident Preferred Route (right) 3.3 miles. Both 8 minutes travel time.

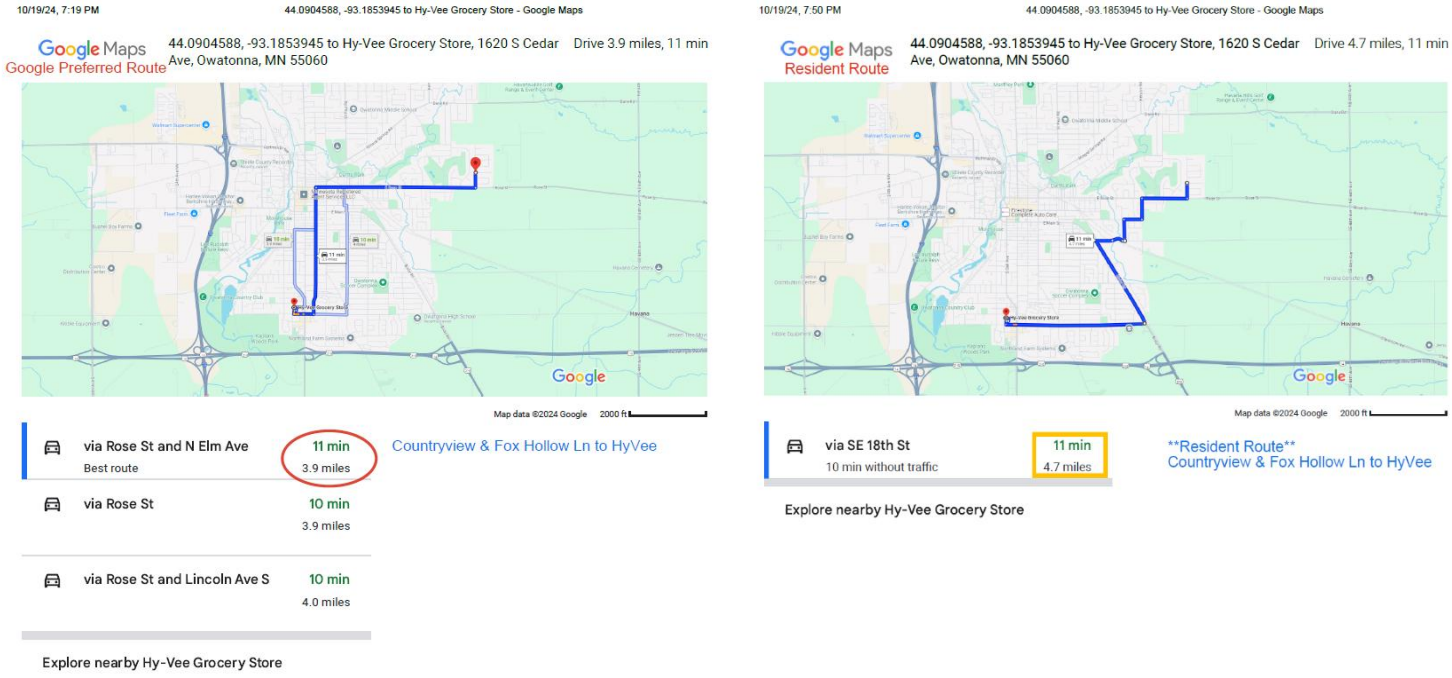


Figure R32 – Countryview & Fox Hollow Ln to Hy-Vee Google Recommended Route (left) 3.9 miles and Resident Preferred Route (right) 4.7 miles. Both 11 minutes travel time.

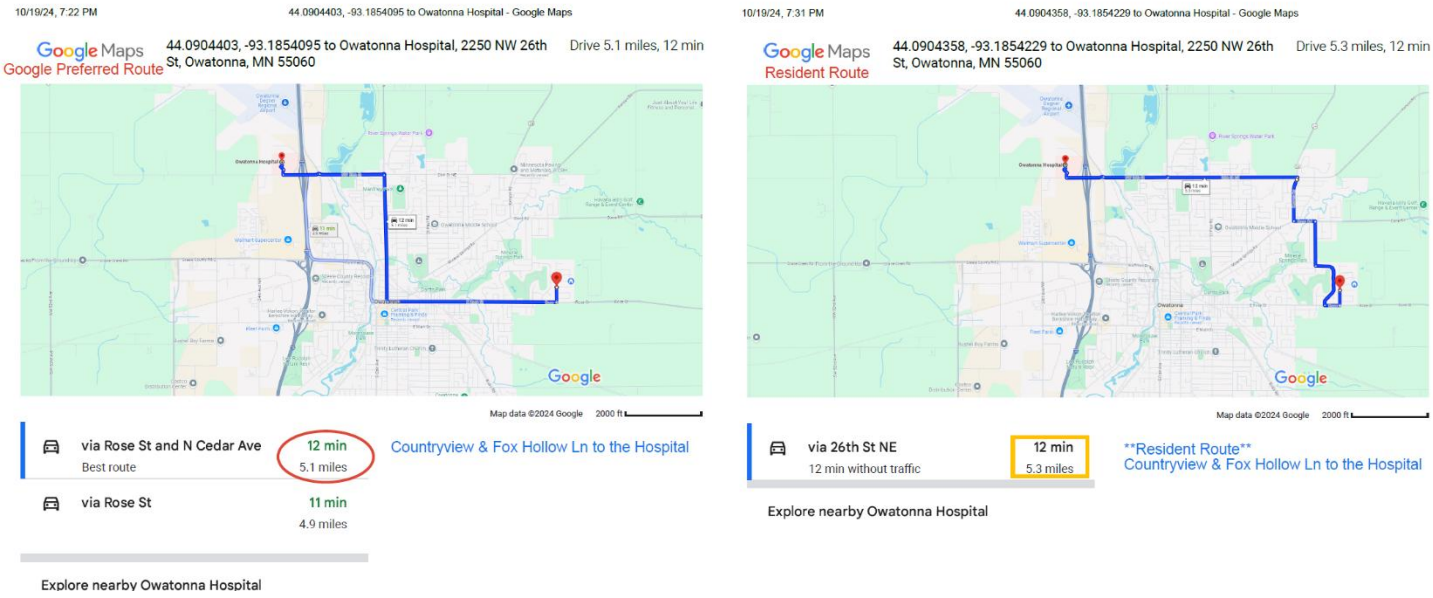


Figure R33 – Countryview & Fox Hollow Ln to the Hospital Google Recommended Route (left) 5.1 miles and Resident Preferred Route (right) 5.3 miles. Both 12 minutes travel time (although resident route is often faster).

The Memorandum fails to acknowledge that many residents already avoid downtown and are not contributing to traffic counts along the targeted routes. In fact, residents often choose longer routes, demonstrating a willingness to drive farther for only minor benefits—undermining the need for the proposed alignment. This makes the continued preference for Alternative 3 over Alternative 4—despite similar travel times and far greater residential impacts—appear less like an objective conclusion and more like an effort to justify a predetermined outcome.

Page 36: Traffic Analysis Memorandum

This analysis evaluates:

- Trip length and travel time between origins and destinations
- Downtown congestion impacts

However, it relies on the same inaccurate times and distances highlighted in the previous section. Notably, the chart on this page introduces an additional data set not found elsewhere in the Memorandum.

6	26th St NE and Cedar Ave	New Owatonna Senior High School	10	4.1	Cedar Ave, Rose St, Grove Ave, Main St, Bixby Rd, SE 18th St

That dataset—originally studied—was removed from final comparisons, because it showed no benefit from the East Side Corridor. If this route had genuinely offered improvements, the data would have reflected that. Instead, removing it appears to skew the analysis toward a predetermined outcome, rather than allowing the data to speak for itself.

Page 37: Calculations

While it's reasonable to use Google Maps for estimating travel times along existing routes, it is troubling that WSB both relied on and manipulated this data inconsistently. Distance—unlike time—is a fixed variable. Any deviation in distance between two known points signals an error or manipulation.

> The general method of estimating travel time and distance was to use Google Maps where possible for alternatives that follow existing roadways. Estimates for new alignments were determined by adding or subtracting time and distance from the Google Maps measurements. Travel time on new alignments was assumed to be one minute per mile in rural areas and two minutes per mile in developed areas. Although Alternative 6 has been dismissed from further consideration, it is shown in the tables in this section because it follows the existing SE 44th Avenue alignment and thus serves as the basis for many of the travel time and length estimates.

As professionals in this field, engineers are expected to apply fundamental mathematical principles—not manually add or subtract times from Google Maps or rely on broad assumptions. The formula is straightforward:

Time = Distance ÷ Speed

For example, the distance from 26th St. to 18th St. (3 miles), from Kenyon Rd. to Alternative 4 (1 mile), and then from Alternative 4 to the High School (1.25 miles) adds up to 5.25 miles. At 55 mph for 5 miles and 30 mph for the final 0.25 miles, the travel time is:

- **(5 ÷ 55 + 0.25 ÷ 30) × 60 = approximately 6 minutes (5:57)**

Yet, the Memorandum lists Alternative 4 from 26th St. & Kenyon Rd to the High School as taking 10 minutes**.** Even factoring in multiple stop signs (adding an exaggerated 30 seconds each), this route would still take no more than 8 minutes. These mathematical discrepancies raise serious questions about how travel times were calculated—and why they differ so drastically from basic math.

Compounding this issue is WSB's own contradiction. At the May 30, 2023 open house, representatives told residents that Google Maps was not a reliable tool for measuring travel times. Yet that same tool appears to be the foundation for their own data—and selectively modified to suit the outcome.

Similarly, the Alternative 5 (34th Avenue) route is 6.06 miles, which at 55 mph would take less than 7 minutes (6:36), yet the Memorandum claims it takes 11 minutes. These exaggerated time differences were used to disqualify Alternatives 4 and 5—an outcome that appears unsupported by real data.

Inaccurate and inconsistent calculations suggest these conclusions were not based on objective analysis, but rather tailored to disqualify specific alternatives. For a project of this magnitude, there is no justification for using hand-modified Google data and vague time assumptions like "1 minute per mile" in place of standard mathematical models or engineering software.

The differences aren't just minor—they're astounding, and they call into question the integrity of the decision-making process itself.

When standard mathematical formulas are correctly applied—even accounting for generous 30-second stops—a very different picture emerges. Alternative 3 offers no significant improvement over current routes, while Alternative 4 proves to be the fastest overall, with all routes showing time savings. Alternative 5 is only a few seconds slower on one route. (See Figure R34)

Residental Analysis of Alternatives Using Matememathical Formulas + Stops

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8	13min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7min/2.8 mi	10 min/4.3 mi	9 min/5.7 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	8 min/5.1 mi	11 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	6 min/3.3 mi	9 min/4.8 mi	10 min/6.0 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
5	26th St NE & Kenyon Rd	9 min/6.1 mi	12 min/7.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/4.3 mi	10 min/5.8 mi	11 min/7.0 mi

faster than existing
similar/shorter distance
slower than existing

**Alternative 3 in it's proximity to homes will cause a slower roadway - assumed a 40mph travel speed.
**Factored in 30 seconds for each of 4 stops on each route. Most stops do not take 30 seconds.

Figure R34 – Estimated Travel Times for Alternatives 3–5 Using Standard Time Formula with 30-Second Stop Delays Included.

How did WSB's "assumed" travel times for Alternatives 4 and 5 diverge so significantly from the travel times produced using standard distance-speed calculations? This discrepancy raises serious concerns about the validity of the assumptions used in the analysis. If basic formulas—combined with reasonable delays—demonstrate shorter or comparable travel times, then WSB's assumptions appear to have artificially disadvantaged Alternatives 4 and 5, leading to their premature dismissal.

Page 38-44: Justifications

These pages attempt to justify travel time differences between alternatives. However, the analysis did not use actual calculated times or consider current travel behaviors of residents—calling the validity of these comparisons into question. Even using inaccurate data, the Memorandum acknowledges that Alternatives 2 through 4 offer similar benefits. So why was Alternative 4 removed from consideration? Had proper calculations been applied, Alternative 5 likely would have remained viable as well. The pattern suggests bias in favor of a predetermined outcome rather than a fair evaluation of all options.

Page 45: Trip Time Summary

Tables 8 and 9 rely on travel times and distances derived from methods previously shown to be inconsistent and unreliable. Given the questionable techniques used—such as adding and subtracting from Google Maps without proper calculations—these summaries should not be considered accurate or dependable until travel times are recalculated using standard methodologies.

Page 45: Downtown congestion impacts

This section fails to reflect the actual travel patterns of residents. Due to downtown traffic delays and poorly synchronized lights, many residents already avoid this area—opting for longer but faster-moving alternative routes. These routes, shown in Figures R31–R33, were not studied or acknowledged.

Additionally, while the report claims future growth may increase downtown congestion, it overlooks a key fact: there is no east-west connector that bypasses downtown. The East Side Corridor, being a north-south route, does not solve this core issue. For example, travel from NE Owatonna to the Hy-Vee area remains unaffected, making such data points irrelevant to the East Side Corridor's justification.

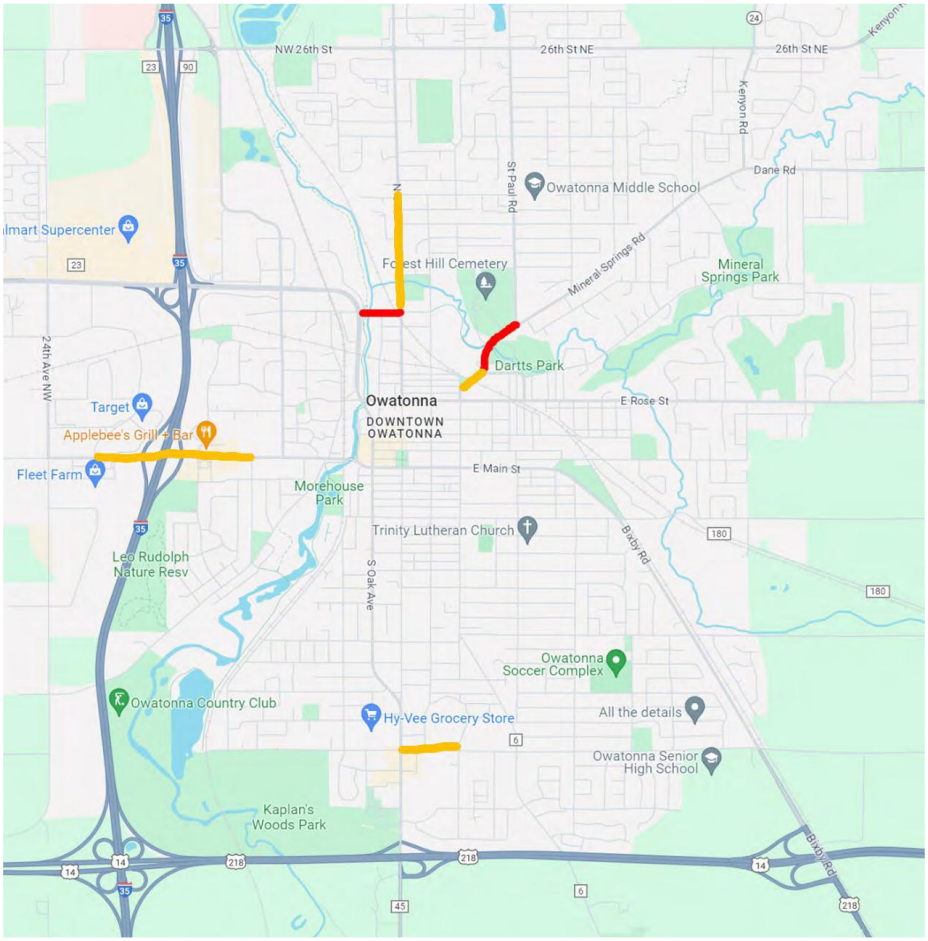
As Owatonna was designed with a spoke-and-wheel road system meant to draw people into the downtown core, the report also fails to address potential economic and logistical consequences of diverting traffic away from downtown—the very heart of the city.

Page 46: Roads Approaching Capacity

Figure 8 claims that certain roads are nearing or at capacity, yet no accompanying studies or data are provided to support this assertion. According to the Memorandum, the East Side Corridor may alleviate traffic at two locations—but these are essentially the same spot, just feet apart on Mineral Springs Road, with a reported net savings of only two seconds.

More critically, this plan redirects traffic toward the already problematic intersection at 18th Street and Oak Avenue, a location long recognized for safety concerns. In effect, the proposal simply shifts the problem rather than solving it, acting as a temporary band-aid for congestion on Mineral Springs Road.

As Owatonna continues to grow, Mineral Springs Road will likely remain a primary east-west connector regardless. This raises the question: does the East Side Corridor actually solve a problem, or just relocate it?



That's not to say a corridor on the east side of town isn't necessary or unjustified—but using downtown traffic relief as the primary rationale is not a sound or measurable justification. The most significant benefit of this project is clearly tied to future development. If growth is the goal, then infrastructure must come first—but that requires transparency. Plans for future growth should be shared openly, yet so far, that data has been withheld from this project.

Page 47: Roads Approaching Capacity Continued

Table 10 in this report, shown below, is based on projected 2040 traffic data taken from the Steele County 2040 Transportation Plan. However, the 2040 Plan was developed and adopted *after* East Side Corridor studies were already underway and residents had been referencing data from the then-current 2025 Plan. The timing of the 2040 Plan's release raises legitimate concerns about whether it was produced, at least in part, to help justify the East Side Corridor—rather than serving as an objective, forward-looking planning document.

Table 10. Roadways approaching or exceeding capacity per the Steele County 2040 Transportation Plan.

Roadway	From	To	2040 AADT	Capacity	V/C
Bridge St	Park Dr NW	Selby Ave	20,500	22,000	0.93
18th St SW	CR 45	Hartle Ave	9,500	10,000	0.95
North St	CR 45	Cedar Ave	11,300	10,000	1.13
Cedar Ave	North St	16th St NE	9,200	10,000	0.92
Mineral Springs Rd	Fremont St	Cherry St	9,300	10,000	0.93
Mineral Springs Rd	Cherry St	St Paul Rd	10,100	10,000	1.01

In comparing data from MnDOT's Traffic Mapping Application (https://www.dot.state.mn.us/traffic/data/tma.html), as referenced in this section, traffic volumes have decreased by 8–20% on all but one of the identified "congested" roadways between 2019 and 2024. This trend raises important questions about whether congestion is currently a legitimate concern warranting such significant infrastructure investment.

Roadway	From	To	2019 AADT	2024 AADT	2040 AADT	Capacity	Current V/C	Capacity Change
Bridge St	Park Dr NW	Selby Ave	15400	11,123	20,500	22,000	0.51	-19.4%
18 St SW	CR 45	Hartle Ave	6200	6,550	9,500	10,000	0.66	3.5%
North St	CR 45	Cedar Ave	8900	6,959	11,300	10,000	0.70	-19.4%
Cedar Ave	North St	16 St NE	7200	5,521	9,200	10,000	0.55	-16.8%
Mineral Springs Rd	Freemont St	Cherry St	7900	7,025	9,300	10,000	0.70	-8.8%
Mineral Springs Rd	Cherry St	St. Paul Rd	9300	7,825	10,100	10,000	0.78	-14.8%
			**There was no 2019 data, next most recent 2011 data used					

Figure R35 – Current and Historical AADT: Traffic volumes in Owatonna have shown a downward trend over time.

The only roadway that saw an increase—just 3.5%—was 18th Street, the same corridor this report acknowledges will see added traffic under the East Side Corridor plan. While the 2040 AADT projections suggest this segment may near capacity, reaching those levels would require a traffic increase of over 30%, which is a significant and currently unsupported growth assumption.

Inflated Diversion Estimates and Questionable Assumptions

This report claims that a maximum of 3,800 vehicles could be diverted by the East Side Corridor—1,500 from Bigelow Avenue and 2,300 from Mineral Springs Road. However, this total is misleading. Bigelow intersects Mineral Springs Road, and with only 12 homes on this segment of Bigelow, it's logical that many of the 1,500 vehicles also travel on Mineral Springs. Therefore, combining both figures inflates the number and risks double-counting traffic. The actual number of unique trips that could be diverted should not be assumed to be more than 2300 possible vehicles.

Compounding this issue, the report assumes—without supporting evidence—that 50% of these trips would benefit from the East Side Corridor. Whether that number is accurate or inflated is unclear, as no origin-destination data or survey results were presented.

However, actual calculations tell a different story. Traveling from Bigelow and Mineral Springs Road to the high school via Alternative 5 covers 6.3 miles—0.8 miles at 30 mph and 5.5 miles at 55 mph—yielding a total travel time of approximately 7.5 minutes. The current route is 3.5 miles and takes 8 minutes per Google Maps. Even though Alternative 5 saves 30 seconds, it adds significantly more distance—a tradeoff many drivers are unlikely to make.

Alternative 3 offers a similar 8-minute travel time over 5 miles, assuming an average speed of 40 mph. Again, for no significant time savings and a 71% increase in distance, drivers may simply continue using current routes.

Bigelow & Mineral Springs Rd to High School

Route	Time	Distance
Current:	8 minutes	3.5 miles
Alternative 3 (29th Ave):	8 minutes	5 miles
Alternative 4 (New Route):	6.5 minutes	5.3 miles
Alternative 5 (34th Ave):	7.5 minutes	6.3 miles

Figure R36 – Travel Times Based on Distances and Speed Calculations

Additionally, this area would not benefit from the East Side Corridor for most key destinations. For instance, Hy-Vee is already just 7 minutes away. Even if the East Side Corridor reduced travel time to the high school to 6 minutes, Hy-Vee—located 1.6 miles farther west—would still take at least 10 minutes. Current alternatives to the hospital are also faster. It's unlikely that anyone would choose to drive east just to go west again.

In reality, the only potential benefit of the East Side Corridor for these residents might be travel to the high school—but even that is questionable. While OHS serves approximately 1,500 students, it is highly unlikely that more than half of the 1,500–2,300 vehicles recorded at this intersection are headed there. A more plausible explanation is that much of this traffic is traveling to and from the nearby elementary and middle schools, which serve over 2,000 students just a few blocks away, that would not significantly benefit from the East Side Corridor.

Given the flawed assumptions and lack of supporting data, even the claim that 800 vehicles would benefit is speculative at best. And even if that number were accurate, the projected benefit amounts to a cumulative savings of just two seconds per vehicle. Recent decreases in traffic volumes may already offer similar relief, at no cost, further undermining the justification for the project.

Chapter 2 Summary: Traffic Data Manipulation Reveals Biased Outcome

Chapter 2 critically examines the traffic data and connectivity analysis used to support the East Side Corridor project. It reveals that WSB and Steele County relied on questionable assumptions, inconsistent travel time estimates, and manipulated Google Maps data rather than using standard, transparent calculations. Multiple travel routes contain inaccurate distance measurements, and fundamental mathematical formulas were overlooked—despite being essential to traffic modeling.

Additionally, the report fails to account for real-world resident behavior, such as the common practice of avoiding downtown congestion by taking alternative routes. It also overstates potential benefits, such as time savings and diverted traffic volumes, without sufficient evidence or clarity on how those figures were derived. In some cases, traffic appears to have been double-counted, and unsupported assumptions—like 50% of drivers benefiting from the East Side Corridor—are presented as fact.

What is clear is that recent traffic trends show a decrease in congestion, and standard travel time formulas demonstrate that Alternatives 4 and 5 are faster than Alternative 3. Yet, despite their advantages, Alternatives 4 and 5 were dismissed prematurely.

By using imprecise assumptions and manipulated Google Maps estimates rather than accurate calculations, this report presents skewed data—raising legitimate concerns that the analysis was designed to justify a predetermined Preferred Alternative rather than objectively identifying the most effective, lowest-impact solution.

Chapter 3: Cost Analysis

This chapter highlights how cost estimates were selectively presented to support Alternative 3. Alternatives 4 and 5, which may offer fewer impacts and cost-saving advantages, were excluded from detailed analysis. Key expenses—like noise walls and urban roadway—inflate Alternative 3's cost, while lower-impact options were dismissed without full comparison.

Page 61: East Side Corridor Alternative Cost Estimates

Given the prohibitive cost of home condemnations, Alternatives 1A, 1B, 1C, and 2 were never truly feasible. Alternatives 4 and 5 were dismissed due to alleged travel time disadvantages—even though the Memorandum repeatedly asserts that Alternatives 2–4 offer comparable performance. This analysis has mathematically disproven the claims of longer travel times. As a result, cost breakdowns for Alternatives 4 and 5 were not included. However, using Attachment K, we can draw meaningful inferences about their potential costs and benefits.

Cost Estimates*

Item	Unit	Unit Cost	Option 1A		Option 1B		Option 1C		Option 2		Option 3	
			Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway (urban)	Mile	$ 3,600,000.00	2	$ 7,200,000.00	2.6	$ 9,360,000.00	2.6	$ 9,360,000.00	2	$ 7,200,000.00	2	$ 7,200,000.00
Roadway (rural)	Mile	$ 2,500,000.00	3.02	$ 7,550,000.00	2.83	$ 7,075,000.00	2.93	$ 7,325,000.00	3.29	$ 8,225,000.00	3.55	$ 8,875,000.00
Railroad Crossing	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00
Bridge	Each	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00
Box Culvert	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	3	$ 1,500,000.00	2	$ 1,000,000.00
Sound Wall	Lin Ft	$ 620.00	8000	$ 4,960,000.00	15700	$ 9,734,000.00	14900	$ 9,238,000.00	3300	$ 2,046,000.00	3700	$ 2,294,000.00
Building Removal	Each	$ 30,000.00	36	$ 1,080,000.00	38	$ 1,140,000.00	50	$ 1,500,000.00	10	$ 300,000.00		$ -
Total Take (Relocation)	Each	$ 250,000.00	36	$ 9,000,000.00	38	$ 9,500,000.00	50	$ 12,500,000.00	10	$ 2,500,000.00		$ -
RW (Perm) (Residential)	Sq Ft	$ 3.00	775,556	$ 2,326,668.00	756,191	$ 2,268,573.00	665,090	$ 1,995,270.00	794,362	$ 2,383,086.00		$ -
RW (Perm) (Rural)	Sq Ft	$ 0.75	775,556	$ 581,667.00	756,191	$ 567,143.25	665,090	$ 498,817.50	794,362	$ 595,771.50	1,983,451	$ 1,487,588.25
RW (Temp) (Residential)	Sq Ft	$ 1.00	267,827	$ 267,827.00	305,735	$ 305,735.00	254,666	$ 254,666.00	261,828	$ 261,828.00		$ -
RW (Temp) (Rural)	Sq Ft	$ 0.25	267,827	$ 66,956.75	305,735	$ 76,433.75	254,666	$ 63,666.50	261,828	$ 65,457.00	743,287	$ 185,821.75
		Total Cost		**$ 38,033,118.75**		**$ 45,026,885.00**		**$ 47,735,420.00**		**$ 29,577,142.50**		**$ 25,542,410.00**

*This is a high level budgetary comparison between alternatives and is not meant to reflect actual project costs. Variability and contingency are built into the estimate.

According to the current analysis, Alternative 3 includes 2 miles of urban roadway and 3.55 miles of rural roadway, totaling 5.55 miles. However, in its expanded form, the alignment only measures 4.6 miles. This discrepancy raises questions—where is the additional mile accounted for?

Due to its proximity to existing homes, Alternative 3 would create significant noise impacts, necessitating a $2.3 million noise wall. In contrast, Alternatives 4 and 5 are located farther east, away from noise-sensitive areas, and would not require such mitigation as they effectively avoid residential impacts. Urban roadway was incorporated into Alternative 3 to comply with MnDOT's speed requirements, yet rural roadway is substantially more cost-effective.

Residents previously informed officials of a federal regulation that allows the purchase of land for avoidance, funded in the same way as noise mitigation. That opportunity was ignored. Now that federal funding has been withdrawn, the full cost of the $2.3 million (or more as a stand-alone noise wall) noise wall will fall on Steele County taxpayers. This represents a missed opportunity for both cost savings and impact avoidance—an outcome that could have been prevented with better engagement and responsiveness to public input.

See Figure R37 for a comparison of known cost-related elements. Although Alternatives 4 and 5 would require longer roadways due to their locations farther east, Alternative 5 already includes 66 feet of owned right-of-way—a significant cost offset. Much of the route also follows an existing roadbed, reducing both construction costs and farmland disruption. It includes an existing railroad crossing, avoiding the need to create a new one and closing Havana Road, preserving east-west connectivity. Furthermore, Alternative 5 has already been mapped as a 150-foot right-of-way corridor and crosses Maple Creek at a previously established crossing protecting natural resources. 34th Avenue prevents floodplain encroachment, reducing the need for costly flood mitigations and allowing for shorter bridge span.

Item	Unit	Unit Cost	Alternative 3		Alternative 4		Alternative 5	
			Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway (urban)	Mile	$3,600,000.00	2	$7,200,000.00	0	-	0	-
Roadway (rural)	Mile	$2,500,000.00	3.55	$8,875,000.00	5	$12,500,000.00	5.54	$13,850,000.00
Railroad Crossing	Each	$500,000.00	1	$500,000.00	1	$500,000.00	0.5	$250,000.00
Bridge	Each	$4,000,000.00	1	$4,000,000.00	1	$4,000,000.00	1	$4,000,000.00
Box Culvert	Each	$500,000.00	2	$1,000,000.00	2	$1,000,000.00	2	$1,000,000.00
Sound Wall	Lin Ft	$620.00	3700	$2,294,000.00	0	$0.00	0	$0.00
Building Removal	Each	$30,000.00		-		-		-
Total Take (Relocation)	Each	$250,000.00		-		-		-
RW (Perm) (Residential)	Sq Ft	$3.00		-		-		-
RW (Perm) (Rural)	Sq Ft	$0.75	1983451	$1,487,588.25	2,373,451	$1,780,088.25	1,329,133	$996,849.42
RW (Temp) (Residential)	Sq Ft	$1.00		-		$0.00		$0.00
RW (Temp) (Rural)	Sq Ft	$0.25	743287	$185,821.75	743287	$185,821.75	743287	$185,821.75
		Total Cost:		**$25,542,410.00**		**$19,965,910.00**		**$20,282,671.17**

R37 – Cost analysis break down if Alternatives 4 and 5 had been included. Since Alternative 5 is an already existing roadway, there is a road bed that could be used as a basis for a new roadway reducing the "Roadway (Rural)" cost.

Both Alternatives 4 and 5 are more cost-effective and faster than Alternative 3. The estimated cost difference between the two is approximately $300,000. However, when factoring in potential savings from existing mapping and infrastructure, Alternative 5 may ultimately be less expensive. In contrast, Alternative 4 would impact more farmland due to the absence of previously acquired right-of-way.

Of all the options, 34th Avenue (Alternative 5) provides the greatest long-term flexibility, the fewest disruptions to residents and agriculture, and significant cost advantages. It is also the route local residents have consistently supported for more than 30 years.

Chapter 4: Conclusion

Conclusion

In summary, the inconsistencies in historical context, omission of critical data, and lack of basic mathematical applications in calculating travel times call into question whether this report genuinely followed the MEPA and NEPA processes to identify the most effective solution—or whether it was crafted to validate a predetermined outcome. Based on this review and supporting documentation, it appears to be the latter.

While the East Side Corridor concept originated in the 1990s and a general route was identified, those plans were effectively abandoned in 2004 when the City of Owatonna and Steele County allowed homes to be built within the mapped right-of-way. This shift was documented in subsequent studies, and future transportation plans modified the alignment, including shorter and more easterly alternatives. 34th Avenue (Alternative 5 today) was specifically mapped and preserved as an inner corridor, consistent with multiple studies and policy goals.

When standard travel time formulas are properly applied, Alternatives 4 and 5 are found to be equally fast—or even faster—than Alternative 3. They also have far fewer impacts to existing neighborhoods. While the project offers minimal current relief for existing traffic congestion, it does provide potential long-term benefit to future residents. Ironically, the neighborhood most affected by Alternative 3—N. Country—is also the one that stands to gain the most immediate benefit, and yet its residents have consistently advocated for avoidance since the first public open house in July 2021. Despite this, their input appears to have been disregarded, with inaccuracies and omissions passed along to state and federal authorities.

A full cost analysis shows that Alternatives 4 and 5 are more cost-effective than Alternatives 1–3. However, that analysis was excluded based on inaccurate travel time assumptions—assumptions that were not grounded in formulaic math but rather Google Maps and estimates. This flaw significantly undermines the credibility of the stated rationale for selecting Alternative 3.

Of the remaining options, Alternative 4 is the fastest and slightly more cost-effective, but it lies in a floodplain and would impact more farmland. Alternative 5—34th Avenue—offers a mapped corridor, existing roadbed, owned right-of-way, and fewer disruptions to farmland or homes. For over 30 years, residents have voiced support for this route. Nearly 600 people have now formally advocated for it.

Based on all of the above, Alternative 5 (34th Avenue) should be considered the data-supported, cost-effective, community-aligned, and environmentally responsible Preferred Alternative for the East Side Corridor.

Comment #151

Farmland Impact Analysis and Federal Noncompliance

ESC EAW Comment #32

Date: December 29, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Legal Deficiency of Farmland Impact Analysis and Federal Noncompliance (MEPA, NEPA, FPPA)

The EAW's treatment of farmland is legally inadequate under the Minnesota Environmental Policy Act (MEPA), the National Environmental Policy Act (NEPA), and applicable federal farmland protection laws.

The EAW acknowledges that the East Side Corridor would permanently convert approximately 64 acres of prime or unique farmland. However, the analysis is limited primarily to a numerical accounting of acreage and parcels. MEPA requires more than quantification. Environmental review must evaluate the nature, extent, and significance of environmental effects, including whether impacts are irreversible and whether they can be avoided or minimized. Prime agricultural land is a protected environmental resource under Minnesota law, and its permanent conversion constitutes an irreversible environmental effect.

The EAW does not analyze functional agricultural impacts necessary to assess significance, including but not limited to:

- fragmentation and bisection of agricultural fields;
- disruption of drainage and subsurface tile systems;
- loss of productive efficiency due to irregular field remnants;
- long-term reductions in agricultural productivity;
- ongoing economic impacts beyond one-time land acquisition;
- long-term tax base implications associated with conversion of agricultural land;
- cumulative impacts for segmentation; and
- disproportionate impacts.

By failing to analyze these impacts, the EAW does not provide sufficient information for the Responsible Government Unit (RGU) to determine whether the project has the potential for significant environmental effects on farmland, as MEPA requires.

The EAW further fails to evaluate avoidance and minimization. MEPA requires environmental review to inform decision-makers whether adverse environmental effects can be avoided or reduced through alternative locations, alignments, or design modifications. Here, the EAW does not meaningfully evaluate whether alternative alignments, reduced right-of-way widths, or use of non-agricultural corridors could lessen farmland impacts. Identifying impacts without analyzing whether they can be avoided or minimized renders the document incomplete.

In addition, the EAW improperly treats the East Side Corridor as an isolated action. Farmland impacts must be evaluated cumulatively where a project is part of a broader pattern of development-facilitating transportation infrastructure. Incremental conversion of farmland through connected or reasonably foreseeable projects constitutes a cumulative environmental effect that must be disclosed and analyzed under both MEPA and NEPA.

Because the East Side Corridor involves federal funding and FHWA coordination, compliance with NEPA is required. NEPA mandates a "hard look" at direct, indirect, and cumulative environmental impacts, including cumulative farmland loss resulting from transportation projects that facilitate development and land conversion. The EAW does not evaluate how this project contributes to cumulative farmland loss when combined with reasonably foreseeable development and infrastructure expansion.

Further, the project triggers the **Farmland Protection Policy Act (FPPA)**, which applies to federally funded or assisted projects that convert prime, unique, or statewide-important farmland. FPPA requires completion of **Form AD-1006 (Farmland Conversion Impact Rating)** and coordination with the Natural Resources Conservation Service (NRCS). The EAW does not disclose that an FPPA review was conducted, does not include an AD-1006, and does not analyze farmland impacts consistent with FPPA criteria. Failure to complete and disclose FPPA review constitutes a procedural violation of federal law.

Finally, NEPA requires disclosure sufficient to support informed public participation. Reducing farmland impacts to an acreage table deprives the public of the information necessary to understand the permanence, severity, and broader implications of farmland conversion. Disclosure without analysis does not satisfy NEPA's "hard look" requirement.

For these reasons, the EAW's farmland analysis fails to comply with MEPA, NEPA, and the Farmland Protection Policy Act. Because the project involves permanent conversion of prime farmland, unaddressed cumulative impacts, and unresolved federal compliance deficiencies, the Responsible Government Unit cannot lawfully conclude that the project lacks the potential for significant environmental effects. Preparation of an Environmental Impact Statement (EIS) is therefore required.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Impacted resident

Comment #152

Improper Federal Funding Manipulation, Predetermination, and Chilling of Public Participation
ESC EAW Comment #37

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Improper Federal Funding Manipulation, Predetermination, and Chilling of Public Participation

I submit this comment to document a clear and troubling sequence of events demonstrating **predetermination**, **false claims regarding the need to transfer federal funds, improper manipulation of federal funding**, **misrepresentation of resident intent**, and a **chilling effect on public participation** related to the East Side Corridor (ESC) project.

Chronology of Events

March 3, 2025
The Public Works Committee met. The agenda and minutes show **no discussion of a federal funding transfer for the ESC** (attached)

March 24, 2025
Residents launched a GoFundMe fundraiser for the stated purpose of **seeking government transparency and accountability**, including public data access. The fundraiser did **not** threaten litigation related to the ESC project and did not reference any intent to sue. (attached)

March 25, 2025 (8:30am)
The day after the fundraiser launched, County Engineer contacted MnDOT State Aid proposing to remove $3.96 million in federal funding from the East Side Corridor project. In this email, he explicitly stated that a primary benefit of removing federal funding would be to **avoid spending a "very significant portion" of that funding on noise walls**, which he characterized as "arguably not a good use" of funds. (attached)

This correspondence demonstrates that the funding shift was motivated not by engineering necessity or environmental review outcomes, but by an intent to **avoid mitigation obligations** associated with federal funding.

March 25, 2025 (later the same day)
The Steele County Board of Commissioners met in regular session. The East Side Corridor and the proposed federal funding transfer were **not discussed**, debated, or voted on, and therefore do not appear in the official minutes. (attached)

March 27, 2025
Despite no recorded Board authorization, the County Engineer formally submitted a letter to the Southeast Minnesota Area Transportation Partnership (ATP) requesting approval to transfer the ESC's federal funds. In that letter, he asserted that a "neighborhood group" was

"threatening litigation" and presented that claim as a project risk justifying the transfer. (attached)

This claim was false. At that time, no litigation threats had been made regarding the ESC project.

April 1, 2025
Residents first learned of the federal funding transfer through remarks made at a City Council meeting—**a meeting at which the East Side Corridor was not on the agenda**. There was no prior public notice, hearing, or opportunity for residents to respond before the funding transfer process was already underway. (attached)

That same day, I emailed Commissioner Abbe to ask about the funding transfer. On **April 2, 2025**, Commissioner Abbe responded that he had **no knowledge** of the matter, confirming that the Board had not been meaningfully informed or engaged before staff actions were taken. (attached)

April 8, 2025
At the April 8 County Board meeting, numerous residents spoke during public comment, stating variations of "Federally fund it, or forget it," emphasizing that federal funding was necessary to ensure required environmental review and mitigation.

That same evening, the federal funding transfer was presented as an "informational" item. **No recorded vote was taken**, yet the transfer process continued forward.

Proceeding with a federal funding transfer without a recorded vote, contrary to the requirements of Minn. Stat. § 13D.01, subd. 4(b), further demonstrates that key project decisions were made outside the public process and before completion of environmental review. Furthermore, presenting the funding transfer as "informational" while proceeding without a recorded vote obscured the Board's decision-making responsibilities and limited meaningful public participation, undermining the transparency required for lawful and informed environmental review. Under Minnesota Open Meeting Law, all appropriations of money must have a recorded vote. (minutes attached) .

During the meeting and in official materials, the County Engineer again referenced alleged litigation threats by residents—claims that remained unsupported by evidence and contradicted the content of the GoFundMe fundraiser itself. These false claims publicly mischaracterized resident intent and were relied upon to justify the reallocation of federal funds.

Hostile Environment and Chilling Effect

Following the April 8 meeting, the public engagement environment became openly hostile. County Administrator Renae Fry stated that the litigation claims originated from the GoFundMe

fundraiser, then immediately backtracked, saying she "couldn't say" it was us/our group that made the statements but they hear it all the time—implicitly acknowledging that she knew about the fundraiser and that it did **not** threaten litigation or justify the claims being made.

This sequence demonstrates that:

- Staff knew residents were **not threatening litigation**
- Staff nevertheless used that false narrative to justify funding actions
- Residents were publicly portrayed as obstructive or legally aggressive
- Public participation was chilled through mischaracterization and hostility

Significance to Environmental Review

This record shows that:

- Federal funding decisions were driven by a desire to **avoid required mitigation obligations**, rather than by environmental analysis or outcomes.
- **ESC EAW Comment #36** documents that the County was aware of the regulatory and environmental consequences of dropping federal funding prior to pursuing the transfer.
- Funding was shifted **before** environmental review was complete
- The County acted to **limit the applicability of federal environmental safeguards**
- The public was excluded from meaningful participation at critical decision points
- False claims were used to discredit resident involvement

These actions undermine the integrity of the environmental review process and demonstrate **predetermination**, warranting heightened scrutiny and preparation of an independent, Environmental Impact Statement (EIS) with FHWA oversight.

Conclusion

The Environmental Assessment Worksheet fails to disclose this funding manipulation, the improper sequencing of decisions, the false portrayal of resident intent, and the resulting chilling of public participation. This omission is material. Environmental review cannot be considered objective or complete when key decisions were made in reaction to resident advocacy rather than environmental analysis.

For these reasons, the Responsible Governmental Unit must require a full Environmental Impact Statement.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

STEELE COUNTY
PUBLIC WORKS POLICY COMMITTEE AGENDA
Public Works Facility – 3000 Hoffman Drive - Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

Monday, March 3, 2025 at 10:00 a.m. – Public Works Conference Room

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Agenda

1. The Environmental Trade Show rental fee.
2. Approve Professional Services Contract with Erickson Engineering for the design of the replacement of Summit Township Bridge L5584 in an amount not to exceed $29,190 and authorize the County Engineer to sign the contract.

Information

3. Professional Services Contract for Clinton Falls Township Bridge Replacement
4. CSAH 2/CSAH 43/CR 180/CR 171 Intersection Improvement Feasibility Study Alternatives (I'll have an attachment for this early afternoon today)
5. Dodge County Wind, LCC Road Use Agreement
6. CSAH 46 No Parking Request
7. Project updates
    a. CSAH 48/18th Street Rail Crossing
    b. CR 180 Rail Bridge
    c. East Side Corridor
    d. Landfill Demo Relocation

Department Head Reports

Disclaimer: This agenda has been prepared to provide information regarding and upcoming meeting of the Steele County Policy Committee. This document does not claim to be complete and is subject to change.

STEELE COUNTY
PUBLIC WORKS POLICY COMMITTEE MINUTES
Public Works Building – 3000 Hoffman Drive - Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

Tuesday, March 3, 2025 at 10:00 a.m. – Public Works Conference Room

---

Attendees: Commissioner Krueger, Commissioner Prokopec, County Engineer Paul Sponholz, Four Seasons Director Steve Schroht, Assistant County Engineer Jackson Knudson, Landfill Supervisor Josh Johnson, Environmental - Katie Barden, and Executive Assistant Rebecca Kubicek.

Consent:

1. Committee recommends approving Professional Services Contract with Erickson Engineering for the design of the replacement of Summit Township Bridge L5584 in an amount not to exceed $29,190 and authorize the County Engineer to sign the contract.
   Three consultant firms were invited to propose. Two proposals were received for this project. Erickson Engineering specializes in this type of project and was also the low quote.

General:

2. Professional Services Contract for the design of the replacement of Clinton Township Bridge
   Currently soliciting three firms for proposals. Should have results for the March 25th Board meeting.

3. CSAH 46 No Parking Request
   The committee discussed the different options regarding parking on CSAH 46. The committee is recommending placing "no parking" signs on the west side of the road. The committee requested the item go to the full Board on March 25th.

Information:

- The Steele County's Environmental Trade show is coming up in May. Since this is a county event, there is a possibility of offering a lower facility rental fee if necessary. The committee offered ideas for the show. The committee will look at the profit/loss statement at the April 8th committee meeting and if necessary will bring to the Board on April 22nd**.**

- CSAH 2/CSAH 43/CR 180/CR 171 Intersection Improvement Feasibility Study Alternatives. Alternative #4 is being considered as the Preferred Alternative. The committee requested this item be brought to the March 25th work session for review by the Board to accept the finding of the feasibility study. Engineering Department will then move into a full environmental study.

- Dodge County Wind, LCC Road Use Agreement. The Engineering department continues to work on the Road Use Agreement, detailing the usage impact. Currently planned for the March 25th Board meeting.

Highway Project Updates:

- CSAH 48/18th St Roundabout: The RR canceled the latest meeting to resolve agreement differences and rescheduled for a different date.
- CR 180 Rail Bridge: The RR would support a rebuild of the railroad bridge(option 2A) at Steele County's cost
- Eastside Corridor: The County Engineer met with Owatonna Township officials who are in support of only the 29th Ave corridor.

Department Head Reports

Four Seasons: In the upcoming weeks, ice will be removed from the west rink and then east rink will follow. The west rink will remain dry floor till after the fair.

Highway: Kevin Lindquist is retiring end of May. Engineering department is looking for two Engineer Techs.

Landfill: Demolition Relocation project started last week and is going well. The dry winter has allowed there to be little leachate that needs to be removed. SEH is working on the final plans for expansion.

Residents pressure county board

A large contingency of residents representing the neighborhood where the proposed East Side Corridor would be located makes its voices heard at last week's Steele County Board meeting in Owatonna. They tried unsuccessfully to turn over a petition with more than 500 names.

Petition calls for better solution with East Side Corridor

Demand Transparency for Steele County Families

Co-organized

Matt S and Melissa Z are organizing this fundraiser.

Donation protected

Steele County and the City of Owatonna are planning a $30M+ highway project called the East Side Corridor (ESC) that will run dangerously close to our homes—some within just 17 feet of the right-of-way. Many families with young children live in these neighborhoods, yet many city and county leaders refuse to engage with the community in good faith.

Despite our legal right to access public records under Minnesota's Chapter 13 Data Practices Act, release of all data by the county and city is being delayed, blocked, and denied. It has been months since we requested this data (October 2024 for county and January 2025 for city).

County and city meetings have been held behind closed doors, with no public documentation.

Citizens have been denied access to public data, and even when available, they are not allowed to photograph it—despite state and local precedent.

What are they hiding?

Our message to local officials:

"Government should work for the people, not against them. We have followed the law. We have asked for transparency. Instead, we have faced roadblocks, secrecy, and silence. We will not stop until the truth is revealed."

To demand accountability, we need to file a legal request for the State of Minnesota to investigate these violations. Each request costs $1,000 per government entity, meaning we need to raise at least

$2,000 to move forward. If violations are confirmed, fines may be imposed, records will be required to be released, and individuals could even be removed from office.

Every dollar counts! Any unused funds will be donated to local organizations that strengthen our community.

This isn't just about a road—it's about accountability.

How You Can Help

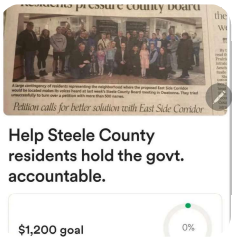
✅ Donate – Even a small contribution makes a difference.

✅ Share – Spread the word to friends, family, and neighbors.

Together, we can demand transparency, accountability, and a voice in the future of our community!

For more information about our cause, please visit our website and Facebook page.

Show your support for this GoFundMe



Updates (1)

March 28th, 2025
by Matt S, Organizer

In just 2 days of our fundraiser going public, we all did it! Our fundraiser goal has been met. Thank you all so much for your help. We will be filing the paperwork in the coming days to have the city and county investigated! We will keep you updated as things progress. Thanks again!

Donations (23)

See top

This fundraiser is located near you

See all

Co-organizers (1)

Matt S
Organizer
Owatonna, MN

Contact

Melissa Z
Co-organizer

Words of support

Please donate to share words of support.

Created March 24th, 2025 · Community

Report fundraiser

$2,100 raised

Share

The organizer has currently disabled new donations to this fundraiser.

This fundraiser is located near you

Anonymous
$20 · 2 mos

Anonymous
$100 · 2 mos

Bob Grant
$250 (Offline) · 2 mos

Anonymous
$50 · 2 mos

Anonymous
$50 · 2 mos

See all | See top

lyssalynn13@gmail.com

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Tuesday, March 25, 2025 8:30 AM
To: Fausto Cabral (fausto.cabral@state.mn.us)
Cc: sean.murphy@owatonna.gov
Subject: FW: ATP 6 2029 application template - CSAH 48/Main St Reconstruct

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

Fausto,

Sean has been discussing our joint project CSAH 48/Main Street with you for federal funding to help pay the city's share of the project. We already have federal HSIP funding ($450,000) for this project, so the project is already federalized.

What if we were to remove the federal funding from the East Side Corridor project and put it on this project, $3,960,000? That would solve some significant issues with the ESC, defederalize that project, and remove the need for us to do a CATEX on that project, while getting us the 30% needed on the Main St. project, a project that is already federalized. The biggest benefit, we'd align federal dollars better to maximize road improvements on Main Street and not have to spend a very significant portion of that nearly $4 million on noise walls, arguably not a good use for these funds.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

Note: Since the East Side Corridor was not addressed at this meeting, it is not reflected in the official minutes.

PROCEEDINGS OF THE STEELE COUNTY BOARD OF COMMISSIONERS

REGULAR SESSION March 25, 2025

STATE OF MINNESOTA }
} ss
COUNTY OF STEELE }

The Steele County Board of Commissioners met in Regular Session at 5:00 p.m. on March 25, 2025 with Commissioner's Brady, Glynn, Prokopec, Abbe and Krueger present. Also present were Human Resources Director Gina McGuire, Finance Director Candi Lemarr, IT Director Dave Purscell, County Engineer Paul Sponholz, County Assessor Brian Anderson, County Attorney Robert Jarrett, PT&E Jennifer Mueller, MNPrairie Director Tara Reich, County Sheriff Lon Thiele, Public Health Director Amber Aaseth, County Administrator Renae Fry and Executive Assistant Rebecca Kubicek.

Call to order and Pledge of Allegiance.

Motion by Commissioner Glynn, seconded by Commissioner Abbe to approve the agenda with a reduction of $25.71 in the payment of the bills and to bring forward MNPrairie Resolution "Terminate Minnesota Prairie County Alliance Joint Powers Agreement" from the work session. Ayes all.

Public Comment: Two people spoke regarding the upcoming item - Termination of MNPrairie Joint Powers Agreement.

Correspondence: City of Owatonna TIF for District No. 3-18 letter from Northland Public Finance

Motion by Commissioner Abbe, seconded by Commissioner Glynn to approve Consent Agenda. Ayes all.

Consent Agenda:

A. Approve the minutes of March 11, 2025 Board Meeting
B. Approve the minutes of March 11, 2025 Board Work Session
C. Approve the minutes of March 13, 2025 Board Special Session
D. Approve Bills and Journal Entries
E. Approve Personnel Report

New Hires/Promotions/Demotions/Transfers **(Positions previously approved by Board):**

Name	*Position/Dept.*	*Rating/Step*	*Date*
Noah Blum	Engineering Tech I/Highway	B23/4	03/25/2025
Courtnee Kopachek	Correctional Officer/DC	B24/2	03/31/2025

F. Approve Body Art Establishment Temporary License for Seven Tattoo Parlor for March 28th – March 30th at the Four Seasons Centre.
G. Adopt **Resolution 25-016** approving the Restorative Practices Advisory Committee (RPAC) member appointments.
H. Approve Public Health to receive an annual allocation of 10% of the Opioid Settlement Funds awarded by the County each year for administration of this funding.
I. Approve Fitness Room Policy at the Detention Center.
J. Approve amendments to the 2025 Fee Schedule.
K. Approve Landfill Certificate letter for Blue Earth and authorize the chair to sign.
L. Approve Professional Services Contract with Erickson Engineering for the design of the replacement of Clinton Falls Township Bridge 74514 in an amount not to exceed $27,990 and authorize the County Engineer to sign the contract.

General Agenda:

Motion by Commissioner Krueger, seconded by Commissioner Prokopec to approve the Request for Proposal for the Disbursement of the Steele County Local Homeless Prevention Aid Funds. Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Abbe to approve the Request for Proposal for the Disbursement of the Steele County Statewide Affordable Housing Aid Funds, approve Scoring Matrix and authorize Staff to Administer the plan contained in the approved RFP. Ayes all.

Motion by Commissioner Krueger, seconded by Commissioner Prokopec to approve the Amendments to the Steele County Local Housing Trust Fund Ordinance # 40. Ayes all.

Commissioner Krueger offered the following **Resolution with attached recommendations**, seconded by Commissioner Glynn

Terminate Minnesota Prairie County Alliance Joint Powers Agreement

2025-017

WHEREAS, the Steele County Board of Commissioners entered into a joint powers agreement to create Minnesota Prairie County Alliance on May 19, 2014, hereafter referred to as "JPA";

WHEREAS, the JPA created a Joint Powers Board, hereafter referred to as "JPB"; the JPB was delegated the Steele County's powers to administer essential human services programs and services mandated by federal or state law;

WHEREAS, the termination clauses contained in Section 15.2 of the JPA states "[t]his Agreement continues in force until two-thirds of the boards of commissioners of the Member Counties that have not given a notice to withdraw adopt resolutions to terminate this Agreement."; and

WHEREAS, the Steele County Board of Commissioners has not given notice to withdraw;

NOW, THEREFORE, BE IT RESOLVED the Steele County Board of Commissioners votes to terminate the Minnesota Prairie County Alliance agreement, with immediate effect.

BE IT FURTHER RESOLVED the Joint Powers Board remains active until December 31, 2026, or until an earlier time, to conduct the winding down of JPB affairs and conduct an orderly transition to County operations.

BE IT FURTHER RESOLVED it is the intention of the Steele County Board of Commissioners to allow the Joint Powers Board as needed authority to conduct essential human services operations until such time operations can be transitioned to the County. Steele County retains exclusive authority and control over required human services.

BE IT FURTHER RESOLVED the Steele County Board of Commissioners directs the County Administrator to take all action necessary to re-establish the Steele County Department of Human Services.

Recommendations:

- Recommend to the Joint Powers Board that they issue a public statement regarding the mutual decision to dissolve MN Prairie County Alliance.

- Recommend to the Joint Powers Board that they establish a wind down transition team, seek proposals from accounting firms to conduct a forensic audit of MN Prairie County Alliance, retain an external consultant to oversee operations, including financial, during the wind down, and take such actions as may be needed to protect the interests of the three counties during the wind down period.
- The County should create its own Department of Human Services
- Direct the County Administrator and County Attorney to oversee the orderly transition of human services to county operations, including, but not limited to, recommending consulting services as may be necessary to structure the new human services department, coordinating with Waseca and Dodge counties' staff on transition matter, and developing a hiring plan so as to retain current MNPrairie staff as may be reasonable and necessary to establish and operate Steele County's new human services department.

Upon the vote being taken, five Commissioners voted in favor thereof, none absent and not voting. A copy of the Resolution is on file in the Administration Office.

Commissioner Abbe offered the following **Resolution**, seconded by Commissioner Krueger

Regarding Official Agendas, Minutes, and Records
2025-018

WHEREAS, the Steele County Board of Commissioners must maintain official agendas, minutes, and records according to the Official Records Act. *See* Minn.Stat. § 15.17.

WHEREAS, Minnesota law allows records to be produced in the form of computerized records. Further, the law does not require data to be kept in any specific format nor publish a summary. *See generally* Minn.Stat. §§ 13.03; 15.17.

WHEREAS, it is more effective and efficient for government operations for all records to be kept in an electronic format for members of the public to access government records via the county webpage.

NOW, THEREFORE, BE IT RESOLVED all official agendas, minutes, board packets, ordinances, and resolutions shall be maintained and published electronically. Minutes and agendas will be available on the county web page at a minimum two years.

BE IT FURTHER RESOLVED this resolution shall apply to this body and all formal committees of this body with an effective date of April 1, 2025.

Upon the vote being taken, five Commissioners voted in favor thereof, none absent and not voting. A copy of the Resolution is on file in the Administration Office.

Commissioner Reports:

Commissioner Glynn reported his attendance at Land Use and Records Committee, History Center and the County / Township meeting.

Commissioner Prokopec reported his attendance at Southeast Emergency Medical Services, Workforce Development Joint Powers Board, Closed Session, Steele / Waseca Drug Court, Public Safety and Health Committee, and SPERO.

Commissioner Abbe had nothing to report.

Commissioner Krueger reported his attendance at a Closed Session, Emergency Communication Board, Public Safety and Health Committee, MNP Finance and Joint Powers Board meeting, SMART Bus, Emergency Communication and Rack, County / Township meeting, and a presentation at SCHA " Let's Smile".

Commissioner Brady reported his attendance at SPERO and Closed Session.

County Attorney had nothing to report.

County Administrator reported that as a result of her participation at the Southeast Minnesota Together meetings, she is in conversation with a professor from Winona State University about having her students intern with Steele County.

LISTING OF BILLS
March 25, 2025

Alternative Business Furniture	23,399.15
APX Construction Group LLC	148,337.32
ArchKey Technologies	22,610.00
Central Farm Services	5,317.92
Counties Providing Technology	4,651.00
Faribo Plumbing & Heating Inc	3,103.50
Granicus LLC	7,350.26
IDWholesaler	5,000.00
Jones Haugh & Smith Inc	9,690.00
League Of Minnesota Cities	2,160.00
Moore Md/KellyannaJ	4,099.58
Office of MN IT Services	3,287.24
OpenGov Inc	32,172.05
Phone Station Inc	13,785.00
Sorenson's Appliance & Tv	2,528.50
STEPP MFG	60,123.50
Stewart Sanitation	2,345.90
Summit Food Services LLC	6,948.94
Thomson Reuters - West	2,707.36
UKG Kronos Systems LLC	3,565.07
WHKS & Co	49,353.85
WSB & Associates Inc	5,500.50
94 Payments less than 2000	36,276.09
Final Total:	**454,312.73**

Motion by Commissioner Abbe, seconded by Commissioner Krueger to adjourn to the Call of the Chair at 5:30 p.m. Ayes all.

_____
CHAIRMAN

ATTEST: _____
ADMINISTRATOR

STEELE COUNTY
HIGHWAY DEPARTMENT
PO Box 890 • 3000 Hoffman Dr NW • Owatonna, MN 55060-0890
(507) 444-7670 • Hwy@SteeleCountyMN.gov

March 27, 2025

Greg Paulson, ATP 6 Chair
Southeast Minnesota Area Transportation Partnership
2900 48th Street NW
Rochester, MN 55901-5848

RE: STBGP Funding Transfer Request

Dear Mr. Paulson:

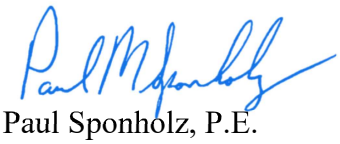
Steele County was awarded $3,960,000 in STBGP funding for the East Side Corridor Project (SAP 074-070-009) for fiscal year 2026. Our project team has run into significant challenges to be able to deliver the project with these funds.

Work to complete the environmental documents was started in 2021 and the Federal Highway Administration initially directed us to complete a Programmatic Categorical Exclusion document. In 2023, the FHWA redirected us to instead complete a Non-Programmatic Categorical Exclusion document which required us to do some significant rework. Now as we are nearing completion of that document currently estimated by late 2025, there are still significant remaining risks to be able to deliver the project in time to use these funds. Even if we complete the environmental document by the December 2025 deadline, we will not have enough time to complete final plans and significant right of way acquisition for construction in 2026. While negotiations have begun with the Canadian Pacific Kansas City Railroad (CPKC) for a necessary new crossing, they are slow to respond. Previous changes to a CPKC crossing on another project has taken over five years of negotiations and still is not resolved. Also, there is a neighborhood group adamantly opposed to this project and threatening litigation against the county which could pose significant risk to the project timeline.

We would like to transfer these funds to another eligible project, the CSAH 48 Main Street (SAP 074-648-008) project for fiscal year 2026. This project is already federalized with a HSIP award of $450,000. The project will reconstruct CSAH 48 Main Street from Oak Avenue to Grove Avenue. A feasibility report was completed in 2023 and our team is about to start final design with construction easily feasible in 2026.

Please consider this request for funding transfer. We request the ATP approve the request for a STIP amendment. Please contact me if you require additional information or have any questions. I may be reached at (507) 475-2253 or at paul.sponholz@steelecountmn.gov.

Sincerely,



Paul Sponholz, P.E.
County Engineer

Encl: CSAH 48 Main Street Feasibility Report

Cc: Fausto Cabral, MnDOT District 6 State Aid Engineer
Sean Murphy, City Engineer, City of Owatonna
Andrew Plowman, WSB

CITY COUNCIL MEETING
Tuesday, April 1, 2025 at 7:00 PM
Charles S. Crandall Center Chambers, City Hall at 540 West Hills Circle
Roll Call: Council Members Burbank, Boeke, McCann, Svenby, Voss, Dotson, and Raney

PLEASE NOTE: At 5:30 p.m. Council will meet in a Study Session in Council Chambers, City Hall at 540 West Hills Circle. Council will review a draft of the proposed 2026-2028 Strategic Plan.

1. **INTRODUCTORY ACTIONS:** Call to Order; Roll Call and Pledge of Allegiance
   - 1.1. Council Agenda
   - 1.2. Mayor Jessop
     - 1.2.1. Proclamation - Child Abuse Prevention Month - April 2025
2. **CONSENT AGENDA ITEMS**
   - 2.1. Minutes – Council Meeting – March 18, 2025
   - 2.2. Board/Commission Minutes
     - 2.2.1. OPU Meeting - February 25, 2025
     - 2.2.2. Human Rights Commission Meeting - February 11, 2025
   - 2.3. Licenses/Permits
     - 2.3.1. Event Permit - NHS Color Run - OHS - May 10, 2025
     - 2.3.2. Retail Fireworks License - Walmart
     - 2.3.3. Tree Trimmer Permits
     - 2.3.4. Exempt Permit - St Mary's School of Owatonna - August 12-14, 2025
     - 2.3.5. Exempt Permit - Sacred Heart Church - August 15-17, 2025
   - 2.4. Miscellaneous
     - 2.4.1. Flock Safety License Plate Reader (LPR)
     - 2.4.2. Professional Services Agreement – 2025 Stormwater Education & Outreach - Clean River Partners
     - 2.4.3. PFAS Source Identification and Reduction Grant - Minnesota Pollution Control Agency
3. **ACTION ITEMS**
   - 3.1. Finance Report
   - 3.2. Ordinances
     - 3.2.1. First Reading Proposed Ordinance 25-05, Charitable Gambling.
     - 3.2.2. First Reading Proposed Ordinance 25-06: Adopt S-8 Supplement to the 2015 Ordinance Code

3.3. Resolutions:

3.3.1. Resolution 15-25: MnDOT Variance 18th Street SE Trail Extension Project

3.3.2. Resolution 16-25: Requesting Federal Funds for Main Street (CSAH 48) Project

3.4. Miscellaneous

3.4.1. Authorization to Proceed - 2025 CIP Overlay

3.4.2. Authorization to Proceed - 2025 Crack Sealing and Seal Coating Project

3.4.3. 2025 Deer Management Program

4. **STAFF REPORTS**

4.1. Jeff Mundale, Chief of Police

5. **PUBLIC COMMENTS:** Please limit comments to 2 minutes. Please approach the microphone, sign-in and state your name and address for the record after being acknowledged by the Council President. Speakers will be limited to two minutes to deliver their comments. Those speaking are asked to conduct themselves in a respectful manner as they deliver their comments. Audience members are asked to refrain from reacting to comments. The City Council will not respond directly to comments in this venue or take immediate action in response to them.

6. **COUNCIL COMMENT AND GENERAL INFORMATION**

7. **ADJOURN**

DATE: April 1, 2025
TO: Mayor and City Council
FROM: Sean Murphy, Public Works Director
SUBJECT: Resolution 16-25: Requesting Federal Funds for Main Street (CSAH 48) Project

Purpose:
Requesting City Council approval Resolution 16-25 Requesting Federal Funds for Main Street (CSAH 48) Project.

Background:
Main Street (CSAH 48) from Oak Avenue to Chambers Avenue is in need of rehabilitation and reconstruction. Steele County is leading the effort on this project as it is a County State Aid Highway. The project was initially slated for 2029 but due to Steele County's construction schedule, they are proposing moving construction to 2026. The City intends to apply for Federal Highway funds are distributed through the Statewide Transportation Improvement Plan (STIP) following the approval of Resolution 16-25, applications are being accepted for 2029 and the City would reimburse the county with potential received federal funds at the time of fund reciept.

A feasibility study was presented and approved during the May 16, 2023 City Council Meeting.

Budget Impact:
Federal funds available for application total $749,000. Costs not covered by the federal funds will be paid for using State Aid Funds.

Staff Recommendation:
Staff recommends approval.

Attachments:
1. Res 16-25 Requesting Federal Funds for Main Street (CSAH 48) Project

RESOLUTION NO. 16-25

A RESOLUTION AUTHORIZING FEDERAL TRANSPORTATION PROJECT GRANT
MAIN STREET (CSAH 48) REHABILITATION

WHEREAS, transportation projects receive federal funding from the Federal Transportation Act; and

WHEREAS, the Federal Highway Administration (FHWA) requires that sponsors agree to operate and maintain facilities constructed with federal transportation funds for the useful life of the improvement and not change the use of right-of-way or property ownership acquired without prior approval from the FHWA; and

WHEREAS, the Minnesota Department of Transportation (MnDOT) has determined that for projects implemented with these funds, the above requirements should be applied to the project sponsor; and

WHEREAS, the City of Owatonna is the project sponsor for the transportation project identified as Main Street (CSAH 48) Rehabilitation.

NOW, THEREFORE, BE IT RESOLVED, that the City of Owatonna will assume full responsibility for the operation and maintenance of the property and facilities related to the aforementioned project.

Passed and adopted this _____ day of _____, with the following vote:

Aye___; No___; Absent___.

Approved and signed this _____ day of _____.

_____
Matthew T. Jessop, Mayor

ATTEST:

_____
Kris M. Busse, City Administrator/City Clerk

Owatonna City Council Minutes
April 1, 2025

On Tuesday, April 1, 2025, at 7:00 p.m., Council President Raney called the regular session of the Owatonna City Council to order in the Chambers of the Charles S. Crandall Center. Present were Council Members Voss, Burbank, Boeke, McCann, and Raney; Mayor Jessop; City Attorney Walbran; Public Works Director Murphy; Police Chief Mundale; Assistant City Administrator Tuma, IT Technology Specialist Inz; City Administrator Busse, Administrative Coordinator Clawson. Council Members Dotson and Svenby, were unable to attend.

Following the roll call of members, Council Member McCann made a motion to approve the agenda as presented, Council Member Boeke seconded the motion, all members present voted aye in approval.

Mayor Jessop presented a proclamation for April as Child Prevention Month. Effective child abuse prevention activities succeed because of the partnerships created between child welfare professionals, education, health, community- and faith-based organizations, businesses, law enforcement agencies, and families. This proclamation was presented to the Owatonna Exchange Club last night in Central Park and blue ribbons tied around trees symbolizing awareness against child abuse.

Consent Agenda Items

Council President Raney explained council members review the Consent Agenda items prior to the meeting for approval in one motion. Consent Agenda items for this meeting include:

- Minutes – Council Meeting – March 18, 2025
- OPU Meeting - February 25, 2025
- Human Rights Commission Meeting - February 11, 2025
- Event Permit - NHS Color Run - OHS - May 10, 2025
- Retail Fireworks License – Walmart
- Tree Trimmer Permits
- Exempt Permit - St Mary's School of Owatonna - August 12-14, 2025
- Exempt Permit - Sacred Heart Church - August 15-17, 2025
- Flock Safety License Plate Reader (LPR)
    - Flock Safety is a US-based company that provides computer vision-enabled video surveillance technology for their license plate readers (LPR), gunshot detectors and real-time video cameras. LPRs are not traffic cameras but will serve as a force multiplier by directing law enforcement resources to areas based upon LPR alerts. Flock's LPR cameras capture registration and vehicle details. They do not capture personal identification characteristics. LPRs also provide alerts on stolen cars, stolen license plates, revoked, suspended and canceled drivers and an agency's "hot list". LPR data is classified as private data - nonpublic data on individuals. Data is subject to the agency's records retention schedule. LPR technology is designed with privacy, accountability and transparency. A department policy and biennial audit is required for the requested eight LPR cameras. The cost is a $24,000.00 annual subscription.

Professional Services Agreement – 2025 Stormwater Education & Outreach - Clean River Partners

An agreement for education and outreach services. The City's Municipal Separate Storm Sewer System (MS4) Permit requires the city to provide routine stormwater and water quality related education, outreach, and public involvement programs and opportunities on an annual basis. Activities and tasks identified in this Scope of Services will be used to meet these MPCA permit requirements and included in mandatory annual reporting. An informed and educated community greatly reduces future capital expenditures related to storm system maintenance and restoration of water quality through prevention and best management practices. The total cost of the services is $9,734.00.

PFAS Source Identification and Reduction Grant - Minnesota Pollution Control Agency

A PFAS Source Identification and Reduction Grant from the Minnesota Pollution Control Agency. Minnesota passed a number of laws in the past few years to reduce the use of PFAS in industry and consumer products. To comply with state regulations and limit the industrial use and eventual human consumption of PFAS, the City of Owatonna has been working with Nero Engineering to prepare a plan to minimize PFAS, completed in June 2024, and is now implementing the PFAS Minimization Plan by identifying PFAS sources. Additional work and expenses are anticipated as the city continues to work towards PFAS reduction and securing this grant will assist in paying for this work. The city will be reimbursed for all qualifying expenses related to the PFAS Identification and Reduction Project, up to $75,000.

Council Member McCann made a motion to approve these Consent Agenda items, Council Member Burbank seconded the motion; all members present voted aye for approval.

Finance Report

Council Member Voss recapped payments made for amounts greater than $20,000 during this period.

$ 23,175.00	Electric Pump Inc - Riverwood lift station replacement pumps
31,041.00	League of MN Cities Ins Trust - SCDIU Property/Causality coverage insurance premium
22,437.35	Owatonna Area Chamber of Commerce - Lodging Tax Aug-Sept - Lodging tax December 2024 - $2,162.57 - Lodging tax January 2025 - $20,274.78
55,352.76	Owatonna Motor Co - 2025 Ford F150 - WWTP - $55,188.96 - 2025 Ford F150 - WWTP - $55,188.96 - misc. parts/supplies $163.80
59,135.00	Ramy Turf Products - Bowie Victor Hydro seeder - Stormwater
155,042.98	Southeast Service Cooperative - March 2025 health ins premiums
22,688.34	US Bank - Entire organization monthly credit card purchases Jan/Feb 2025
$ 171,113.33	Other Expenditures

$ 539,985.76	Subtotal
102,761.00	HRA Housing Assistance Payments
$ 642,746.76	Total Expenditures Presented for Approval

Council Member Boeke made a motion to approve payment of all bills presented, Council Member McCann seconded the motion, all members present voted aye in approval.

First Reading Proposed Ordinance 25-05, Charitable Gambling

City Administrator Busse presented Proposed Ordinance 25-05 for council consideration to increase the number of charitable gambling premises permits from five per organization to eight in licensed liquor establishments. Concerns were received that the current limit is too restrictive, and staff advised increasing the number of permits per organization would not have a negative effect. Council Member Voss made a motion for approval, Council Member Burbank seconded the motion. With a roll call vote was taken, voting aye were Council Members Burbank, Boeke, McCann, Voss and Raney; No Nays; the motion carried. The second/final reading of this proposed ordinance will be heard during the next Council Meeting on April 15, 2025.

First Reading Proposed Ordinance 25-06: Adopt S-8 Supplement to the 2015 Ordinance Code

City Attorney Walbran presented Proposed Ordinance 25-06 to adopt Supplement 8 to the 2015 City Code of Ordinances. American Legal Publication completed recodification of the City Code of Ordinances in 2015. Supplements are prepared with new ordinances since adoption of a prior supplement; this is the eighth supplement. Supp-8 includes 22 ordinances approved since adoption of Supp-7 in October 2023; the last ordinance included is Ordinance #1666, passed December 2, 2024. Council Member McCann made a motion for approval, Council Member Burbank seconded the motion. With a roll call vote was taken, voting aye were Council Members Burbank, Boeke, McCann, Voss and Raney; No Nays; the motion carried. The second/final reading of this proposed ordinance will be heard during the next Council Meeting on April 15, 2025.

Resolution 15-25: MnDOT Variance 18th Street SE Trail Extension Project

Public Works Director Murphy requested approval of Resolution 15-25 approving a variance from the standard for State Aid Operation for the 18th Street SE Trail Extension Project No. S.A.P. 153-090-002. A variance from Minnesota Rules for State Aid Operation 8820.9961 requiring 60-degree angled parking with a present ADT of greater than or equal to 3,000 to have a distance between the traffic lane and parking stall to be 19 feet was requested in May of 2024. The MNDOT Variance Committee found that minimum design standards for 45-degree and 60-degree pull-in diagonal parking, to allow the distance between traffic lane and back-in parking stall for 60-degree parking be 8.4 feet as approved in the variance letter dated August 8, 2025, was signed August 21, 2025. The approved variance results in plan revisions to reflect the change to back in parking. Council Member Voss made a motion for

approval, Council Member Boeke seconded the motion, and all members present voted aye in approval.

Resolution 16-25: Requesting Federal Funds for Main Street (CSAH 48) Project

Public Works Director Murphy commented that applications for Federal Highway funds, Statewide Transportation Improvement Plan (STIP) are currently being accepted for 2029. He requested approval of Resolution 16-25 authorizing request STIP funds for the Main Street (CSAH 48) Project, Main Street (CSAH 48) from Oak Avenue to Chambers Avenue. Steele County is leading the effort on this project, it is a County State Aid Highway. The Main Street project was initially slated for completion in 2029; but Steele County is now proposing this project for next year, 2026. The county was awarded STIP funds during 2026 for use towards the East Side Corridor Project; however, they have a better chance to deliver the Main Street Project within the required time fame. The City will reimburse the county when these STIP funds are received, this is a request for a $749,000 STIP distribution during 2029. A Feasibility Study was presented and approved during the City Council Meeting on May 16, 2023, for the Main Street Project. Council Member McCann made a motion for approval, Council Member Burbank seconded the motion. Council Member Boeke asked what expense the city will incur towards the Main Street Project. Murphy responded the Total Estimated Project Cost is $7.7 million. Of these costs, those eligible for State Aid are $6.6 million, which will be paid 75% by the county and 25% by the city. The City's expense will be just under $1.7 million but this does not include costs for aesthetics like lighting changes or streetscape amenities similar to those used in the Cedar Avenue N Streetscape Project. With no additional comments, all members present voted aye for approval.

Authorization to Proceed - 2025 CIP Overlay

Public Works Director Murphy requested authorization to proceed with an advertisement for bids for the 2025 CIP Overlay. Street segments with surfaces that require repairs beyond crack sealing and routine pothole filling, but have adequate underground infrastructure are good candidates for a mill and overlay project to prolong the street's surface life. Approximately 1.64 miles will be included in the Capital Improvement Overlay Project. Bids will be received April 9th and brought to Council for consideration on April 15th. Council Member Boeke made a motion for approval, Council Member McCann seconded the motion, all members present voted aye in approval.

Authorization to Proceed - 2025 Crack Sealing and Seal Coating Project

Public Works Director Murphy requested authorization to proceed with an advertisement for bids for the 2025 Crack Sealing and Seal Coating Project. The city annually crack seals roadways in advance of sealcoating to prolong surface life. Approximately 5.02 miles are planned for crack sealing and sealcoating in 2025. Bids will be brought to Council for consideration when received. Council Member Voss made a motion for approval, Council Member Boeke seconded the motion, all members present voted aye in approval.

2025 Deer Management Program

Park & Rec Director TW Dieckmann requested authorization for staff to apply for the annual Deer Management Program Permit through the MN Department of Natural Resources (DNR). The city's 2025 program will run similarly to the 2024 program, with a few slight changes as presented in the Staff Report during the March 18th City Council Meeting. Council Member Burbank made a motion for approval, Council Member McCann seconded the motion, all members present voted aye in approval.

STAFF COMMENTS

Jeff Mundale, Chief of Police, provided updates of recent activities at the Police Department.

- Hosted the Owatonna Community Leadership Academy on March 11th.
- Staffing updates: Two officers are currently in training. An offer for a Patrol Officer was made to a current CSO. Our CSO position has been used as a recruitment tool for potential officers. We have an open-ended application for officers and have received some good applicants and will continue to promote the application.
- Next week, the Police Explorers will be participating in the Explorer's 50th Celebration in Rochester. Teams from all over the country will be participating. Captain DuChene, Captain Sorenson and I will also be in Rochester to attend Executive Training.
- IC Poet Grant Applicants – Hope to acquire a candidate to attend this program when it is offered again. I anticipate that there will be a grant opportunity soon and plan to submit a RFP and apply for this grant. Last time, we had some good candidates identified but insufficient time to acquire the required clearance and unable to participate.
- FLOCK Safety System – Thank you for approving this license plate reader technology during tonight's meeting. It will take some time for Owatonna to develop this program, weather does not affect the use of these cameras. Faribault has this system which assisted them in several arrests over the last several years. Mankato and Albert Lea are also looking into acquiring this system. Currently 53 MN communities use FLOCK Safety systems.
- Officer Martin and Vegas attended a SHOC yesterday at the school, they always make a big hit with the students.
- Detective Berg will be making a presentation at Sr Place regarding fraud against seniors.
- May 15th is the date set for the 2025 Police Officer Banquet. The "Officer of the Year" has not been announced and consideration in process. This annual banquet is hosted by the Moonlighter's Exchange Club.

PUBLIC COMMENTS

Gale Knapp, 249 E Main Street – Commented that her home is a historical home and access to her home will be affected by the Main Street Project. She is interested in the design of this project and requests that homeowners along the street be consulted as project plans proceed. Accessibility to her home (front entrance, new side entrance and garage entrance) will all be affected as will access to her next-door neighbor's home.

Melissa Zimmerman, 2525 Stony Creek Dr – Commented that she had prepared a comment for tonight's meeting but now changing after the action taken for federal funding planned for the East-side Corridor Project during 2026 is now directed to the 2026 Main Street Project. She asked if the change in the funding allocations, will push back or void the East Side Corridor Project? She asked everyone be kept in the loop that will be affected by these projects.

MAYOR AND COUNCIL COMMENTS:

Council Member Raney thanked everyone for attending the meeting.

At 7:32 p.m., Council Member Boeke made a motion to adjourn, Council Member Burbank seconded the motion and with no objection, the meeting ended.

Respectfully submitted,

Jeanette Clawson, Administrative Coordinator

STEELE COUNTY BOARD AGENDA

Administration Center - 630 Florence Avenue – Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

TUESDAY, APRIL 8, 2025 at 5:00 PM
County Boardroom, Steele County Administration Center

Persons with background material for agenda items are asked to provide them to the Administrator's Office 5 days prior to the meeting date so that the material can be linked to the online agenda. If handouts at the Board meeting are necessary, please bring enough copies for the Board, county staff, the press and the public. Generally, 15 copies should be sufficient.

Agenda

1. Call to Order
2. Pledge of Allegiance
3. Approve Agenda
4. Public Health Services Video

Public Comment

Those wishing to speak must state their name and address for the record after they are acknowledged by the Board Chair. Each person will be limited to two (2) minutes to make his/her remarks.

Speakers will address all comments to the Board as a whole and not one individual commissioner. The Board may not take action on an item presented during the Public Comment period, unless the item is already on the agenda for action. When appropriate, the Board may refer inquiries and items brought up during the Public Comment period to the County Administrator for follow up.

Correspondence

5. Environmental review for wastewater treatment and/or collection system project letter (pg. 4)

Consent Agenda - *Items listed on the Consent Agenda are considered routine and non-controversial by the County Board. There will be no separate discussion of these items unless requested by a member of the County Board.*

6. Approve March 25, 2025 Board Minutes (pg. 7)
7. Approve March 25, 2025 Board Work Session Minutes (pg. 12)

8. Approve Bills (pg. 14)
9. Approve Personnel Report (pg. 49)
10. Adopt a **Resolution** accepting a cash donation for the Steele County Sherrif's Office from Dean and Kathryn Mennen in an amount of $500.00. (pg. 50)
11. Approve SE MN Emergency Communications expense increase from $1,000 to $4,334 (pg. 52)
12. Approve MN DNR Boat and Water Grant in an amount of $3,124.00 and authorize the Chair and the Sheriff to sign. (pg. 54)

General Agenda

13. April Anniversary Report (pg. 64)
14. East Side Corridor Federal Funding Transfer Request (Informational) (pg. 65)

County Board Work Session – Tuesday, April 8, 2025

15. Action Items

Internal Central Services Committee – April 1, 2025

16. Approve Delegation of Authority to Hire and Appoint Budgeted Positions. (pg. 67)
17. Approve position reclassification from a Highway Tech to Highway Accountant and from a part time .8 to a full-time position. (pg. 69)

Public Works Committee - March 3, 2025

18. Adopt a **Resolution** banning parking on the west side of CSAH 46 (pg. 74)
19. Approve the Dodge County Wind, LCC Road Use and Repair Agreement (pg. 76)

Information Items

20. Internal Central Services Committee Minutes – April 1, 2025 (pg. 109)
21. Property & Maintenance Committee Minutes – April 3, 2025 (pg. 111)

Presentations:

Commissioner Reports:

Next Meeting Notices:

Public Works Committee – **Tuesday, April 8 at 8 a.m., Public Works Facility**

Land Use & Records – **Thursday, April 10 at 8 a.m. in the Boardroom**

Steele County Agenda Item

Informational

Subject: East Side Corridor Federal Funding Transfer Request

Department: Highway

Committee: Public Works **Committee Meeting Date:** NA

Work Session Date: NA **Board Meeting Date:** April 8, 2025

Purpose:

To provide information regarding a request to transfer federal funding from the East Side Corridor (ESC) Project to the CSAH 48 Main Street project

Background:

The County was awarded $3,960,000 in federal funding for the ESC Project. Conditions of using that funding requires a federal environmental document completed by December 1, 2025 and construction started in 2026. The County has been working on that document since January 2022.

Even though the environmental document is nearly complete, the project team no longer is confident that the remaining environmental and final design work will be completed to meet the federal timelines. Past delays were due especially because the Federal Highway Administration (FHWA) changed which level of environmental document to prepare, which added more than a year to the project timeline. Recently, a significant change on the consultant staff disrupted progress. Then with the changes in the federal administration, federal policy is changing which will likely require significant changes to the makeup of the federal environmental document adding more delays.

In addition to delays, some significant risks could affect the project timeline. Staff still needs to complete an agreement with the railroad for a new crossing. Staff has already started working with the railroad to complete the agreement and anticipate it completed with the final plans, but the last similar agreement has taken over five years of effort. Also, the county has received information that a neighborhood group may bring litigation against the project which could potentially delay construction.

With those delays and those significant risks, staff is asking the Southeast Minnesota Area Transportation Partnership (ATP) (the entity that reviews and approves this federal funding) to transfer that federal money to another eligible project so the county doesn't lose that funding. Staff is asking that the money be transferred to the CSAH 48 Main Street project, a project that already has federal funding awarded to it and can meet the required timelines. The ATP meets March 11 to consider this request.

If approved, the Main Street project which has final design budgeted in 2025 would move construction from 2028 to 2026.

The project team is working with MnDOT and FHWA to determine what this means for the ESC project, but has no further information from them at this time. The team intends to continue moving the ESC project along as quick as possible, aiming for construction starting late 2026 and finishing about 2028.

Financial Impacts:

If the transfer of funds is approved, staff will make proposals to shift other funds currently allocated to Main Street to the ESC to replace the federal funding. There is no change to the overall budget or funding amounts. If the transfer is not approved, the ATP could reallocate the funding to another county and we would lose that funding.

Attachments:

NA

PROCEEDINGS OF THE STEELE COUNTY BOARD OF COMMISSIONERS

REGULAR SESSION April 8, 2025

STATE OF MINNESOTA }
} ss
COUNTY OF STEELE }

The Steele County Board of Commissioners met in Regular Session at 5:00 p.m. on April 8, 2025 with Commissioner's Glynn, Prokopec, Abbe, Krueger and Brady present. Also present were Human Resources Director Gina McGuire, Finance Director Candi Lemarr, IT Director Dave Purscell, County Engineer Paul Sponholz, County Assessor Brian Anderson, County Attorney Robert Jarrett, Public Health Director Amber Aaseth, County Administrator Renae Fry and Executive Assistant Rebecca Kubicek.

Call to order and Pledge of Allegiance.

Motion by Commissioner Abbe, seconded by Commissioner Glynn to approve the agenda with removal of item # 19 - Wind Farm. Ayes all.

Presentation: Public Health Video

Public Comment: One person spoke regarding the Main Street project. Six spoke regarding the Eastside Corridor funding transfer. One spoke regarding the Havana feasibility study.

Correspondence: Environmental review for wastewater treatment and/or collection system project letter.

Consent Agenda:

Motion by Commissioner Glynn, seconded by Commissioner Abbe to approve Consent Agenda. Ayes all.

A. Approve the minutes of March 25, 2025 Board Meeting
B. Approve the minutes of March 25, 2025 Board Work Session
C. Approve Bills
D. Approve Personnel Report

New Hires/Promotions/Demotions/Transfers (Positions previously approved by Board):

Name	*Position/Dept.*	*Rating/Step*	*Date*
Carrie Holmen	Accounting Specialist/Finance	B25 / 4	4/07/2025
Christian Overland	Correctional Officer (Programs)/ Det Cent	B24 /1	4/21/2025

Resignations/Retirements/Terminations:

Name	*Position*	*Department*	*End Date*
Stephen Tschopp	Engineer Tech III	Highway	4/11/2025
Melissa Kofstad	Emerg Preparedness Coord	Public Health	4/17/2025
Ryan Rasmusson	Appraiser III	Assessor	4/18/2025
David Brown	Int. Hwy Working Foreperson	Highway	4/25/2025

Open Positions-Pending Board Approval:

Position	*Department*	*Notes*
Engineering Technician I/II/III	*Highway*	*Backfill Tschopp*
Emg Preparedness Coord / RN	*Public Health*	*Backfill Kofstad*
Correctional Officer	*Detention Center*	*Backfill Overland (Transfer)*
Financial Spec to Accountant	*Highway*	*Backfill Holmen (Transfer)*
Appraiser I/II/III	*Assessor*	*Backfill Rasmusson*
Hwy Wking Foreperson/Maint Tech	*Highway*	*Backfill Brown (Retirement)*

E. Adopt a **Resolution** accepting a cash donation for the Steele County Sherrif's Office from Dean and Kathryn Mennen in an amount of $500.00.

ACCEPTANCE OF CASH DONATION
FOR STEELE COUNTY SHERIFF'S OFFICE
2025-19

WHEREAS, Minnesota Statute §465.03 allows counties to accept grants and donations of real or personal property for the benefit of its citizens;

WHEREAS, said donations must be accepted via resolution of the County Board of Commissioners by a two-thirds majority of its members; and

WHEREAS, the Board of Commissioners finds that it is appropriate to accept the donations offered;

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners in and for the County of Steele, Minnesota, that it accepts, with sincere appreciation, the donation of:

$ 500.00 from Dean & Kathryn Mennen

F. Approve SE MN Emergency Communications expense increase from $1,000 to $4,334
G. Approve MN DNR Boat and Water Grant in an amount of $3,124.00 and authorize the Chair and the Sheriff to sign.

General Agenda:

Human Resource Director, Gina McGuire read the April Anniversary report

Name:	**Position:**	**Department:**	**Annv. Date**	**YS:**
Dave Purscell	IT Director	Information Tech.	March	7
Sean Grivette	Correctional Officer	Detention Center	April 1st	9
Matthew Gwin	Correctional Officer	Detention Center	April 3rd	19
Anthony Cassen	Highway Maint. Tec	Highway	April 8th	6
Travis Ernste	Adult Prob.Officer III	Community Correction	April 10th	8
Chad Forystek	Sergeant	Sheriff	April 13th	27

Joyce Prusha	Correctional Srgt	Detention Center	April 15th	23
Leah Kent	LPN	Public Health	April 15th	17
Jocelyn Brooks	Custodian	Facilities and Fleet	April 15th	3
Samantha Ahrens	Adult Prob. Officer II	Community Correction	April 16th	18
Melissa Bos	Acct. Support Spec.	Highway	April 16th	7
Nancy Gjerald	Accounting Tech.	Detention Center	April 19th	21
Thomas Grems	Landfill Operator	Landfill	April 22nd	1
Paul Sponholz	County Engineer	Highway	April 23rd	7
Robert Benson	Home Care Supervisor	Public Health	April 25th	3
June Piepho	Family Support Spec.	Public Health	April 26th	19
Michael Kath	Maintenance Worker	Facilities and Fleet	April 26th	4
Jane Christenson	Technical Clerk II	Sheriff	April 30th	11

The County Engineer reported on the Eastside Corridor Federal Funding. Steele County was awarded $3.96M dollars in Federal Funding for the Eastside Corridor project. The Engineer reviewed the stringent deadlines mandated by the federal government in order to use the funds. As a result of many delays and setbacks, the project team is not confident they can complete the required tasks on time, so the dollars are at risk of being lost. The Engineer provided examples of the setbacks, including but not limited to additional reporting and more detailed reports required by the Federal Government. The Engineer is requesting the Southeast Minnesota Area Transportation Partnership (ATP) shift the Federal funding to the Main Street project that is likely to meet the deadlines. If the change is approved, funds earmarked for the Main Street project could be used for the Eastside corridor project. If this shift is not approved by ATP, the county will need to look to other funding sources for future projects.

Motion by Commissioner Krueger, seconded by Commissioner Glynn to approve Delegation of Authority to hire and appoint budgeted positions to the Administrator. Four voted in favor thereof, Abbe voting against. Motion passes.

Motion by Commissioner Glynn, seconded by Commissioner Abbe to approve position reclassification from a Highway Tech to Highway Accountant and from a part time .8 to a full-time position. Ayes all.

Motion by Commissioner Krueger, seconded by Commissioner Brady to table the Resolution for Parking Restrictions on CSAH 46 till the April 22 meeting. Four voted in favor thereof, Glynn voting against. Motion passes.

Commissioner Reports:

Commissioner Glynn reported his attendance at ICS Committee and the Extension Committee meeting.

Commissioner Prokopec reported his attendance at Public Works Committee.

Commissioner Abbe reported his attendance at Land Use / Records committee, MNP Personnel meeting, MNP JPB meeting, Counties Providing Technology Zoom meeting, Annual County / Township meeting, SCHA Compliance Training, Rice / Steele 911 JPB meeting, and Property & Maintenance committee.

Commissioner Krueger reported his attendance at SCHA Finance Committee, SCHA JP meeting and Compliance training, met with Representative Sexton regarding Medford projects, and Public Works Committee.

Commissioner Brady reported his attendance at Extension Committee, ICS Committee meeting, Rice / Steele 911 JPB meeting, Property and Maintenance committee, Planning Commission meeting.

County Attorney had nothing to report.

County Administrator reported her attendance at the Rice / Steele 911 facility tour. She presented the Citizen Code of Conduct to the Extension Committee. She still needs to present the Code of Conduct to the Board of Adjustments and Planning Commission.

LISTING OF BILLS
April 8, 2025

Advanced Correctional Healthcare Inc	19,676.59
American Lung Association	3,005.74
Block Plumbing & Heating Inc	2,499.60
Braun Intertec Eng Inc	2,222.50
Cardinal Health 110 LLC	3,936.78
Central Farm Services	19,354.40
CTI	28,671.41
ESRI Inc	40,900.00
From the Ground Up LLC	7,995.00
Goodpointe Technology Inc	6,575.00
High Point Networks	3,382.39
Hillyard- Hutchinson	3,050.20
I & S Group Inc	2,760.00
ICON Constructors LLC	184,322.33
Jones Haugh & Smith Inc	3,222.50
Life Fitness LLC	44,985.12
Office of MN IT Services	15,624.25
Owatonna Public Utilities	204,393.12
Pro- West & Associates Inc	4,603.50
SE MN Emergency Medical Services	5,000.00
Short Elliott Hendrickson Inc	32,890.48
Stenzel/David Allen	3,431.63
Streamline Communications LLC	8,480.26
Summit Food Services LLC	10,421.94
Thompson Sanitation	75,722.74

Univ Of Mn Regents	70,237.50
Ziegler,Inc	7,765.83
72 Payments less than 2000	34,389.29
Final Total:	**849,520.10**

Motion by Commissioner Abbe, seconded by Commissioner Prokopec to adjourn to the Call of the Chair at 6:28 p.m. Ayes all.

James Brady
CHAIRMAN

ATTEST: _____
ADMINISTRATOR

Comment #153

Public Comment – Coupling of the 18th Street Railroad Roundabout and the ESC
EAW Comment #26

Date: December 28, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Public Comment – Coupling of the 18th Street Railroad Roundabout and the East Side Corridor

I am submitting this comment to document the direct functional coupling between the 18th Street railroad roundabout and the East Side Corridor (ESC), and to explain why treating these projects as separate actions constitutes improper segmentation.

Internal County correspondence confirms that the County explicitly discussed **"decoupling" the East Side Corridor from the roundabout project**, demonstrating that these projects were understood internally to be connected (see attachment). Despite this, the roundabout was advanced, constructed, and funded as a standalone project and excluded from cumulative analysis in the ESC Environmental Assessment Worksheet.

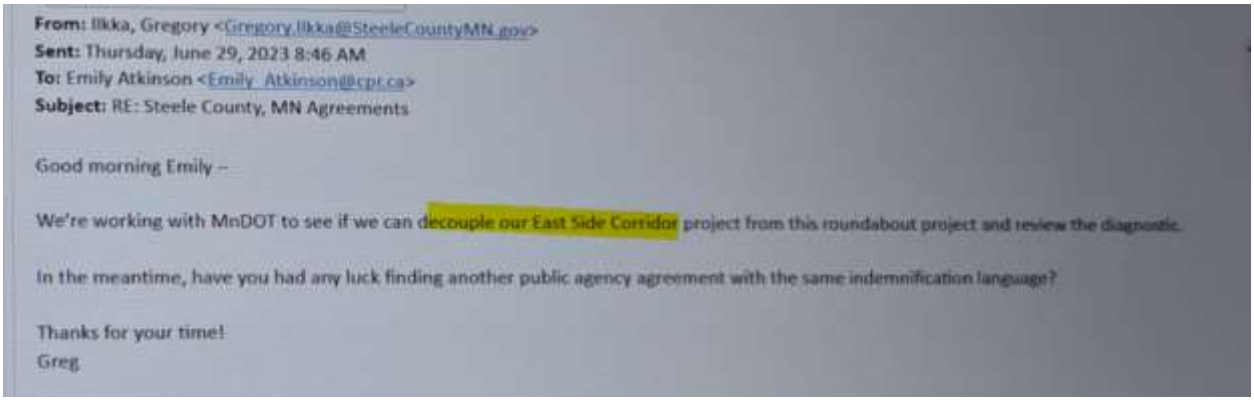
The 18th Street railroad roundabout functions as the **primary southern access point** of the ESC. Its location, geometry, and traffic operations directly affect ESC safety, traffic flow, and feasibility. The roundabout was constructed without securing required railroad permits and at a distance closer to the railroad than required, creating a known non-compliance that will necessitate future reconstruction.

At the same time, the County has argued that the ESC is needed to address traffic generated by the new Owatonna High School located along 18th Street, while asserting for environmental purposes that the 18th Street improvements and the ESC are unrelated. These positions are mutually exclusive.

Under MEPA and NEPA, projects that are functionally dependent, rely on one another for utility, or are used to justify each other are **connected actions** and must be evaluated together. Segmenting the roundabout from the ESC artificially limits the scope of environmental impacts, masks safety and cost consequences, and undermines informed public participation.

This coupling further reinforces the need for a **full, independent Environmental Impact Statement** evaluating the entire east-side transportation and development system as a single action.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident



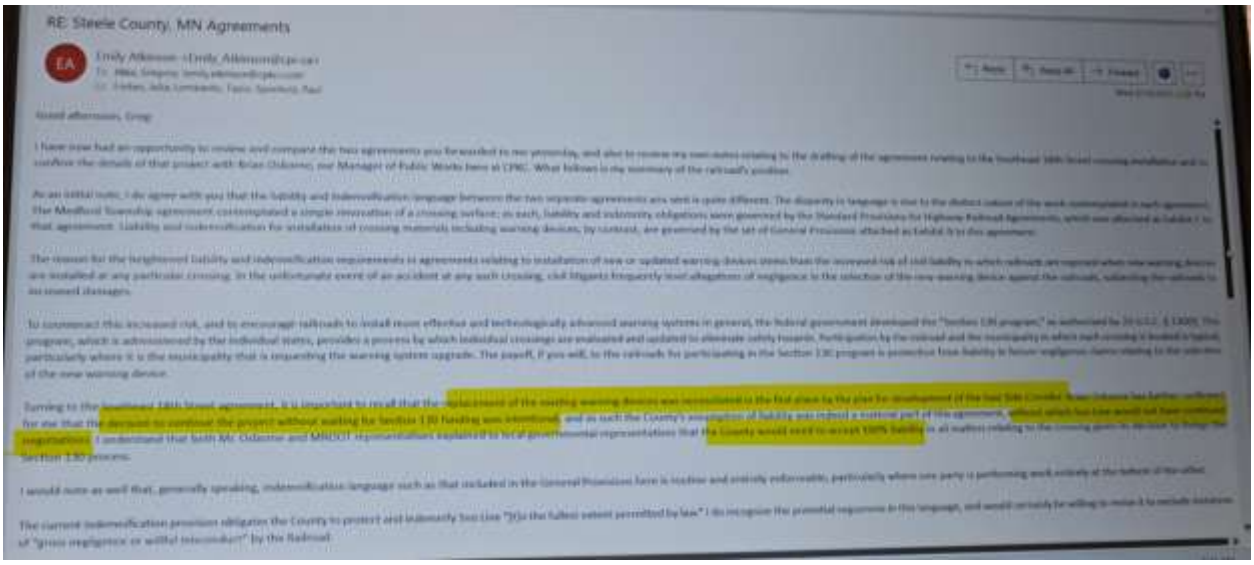
From: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>
Sent: Thursday, June 29, 2023 8:46 AM
To: Emily Atkinson <Emily_Atkinson@cpr.ca>
Subject: RE: Steele County, MN Agreements

Good morning Emily –

We're working with MnDOT to see if we can decouple our East Side Corridor project from this roundabout project and review the diagnostic.

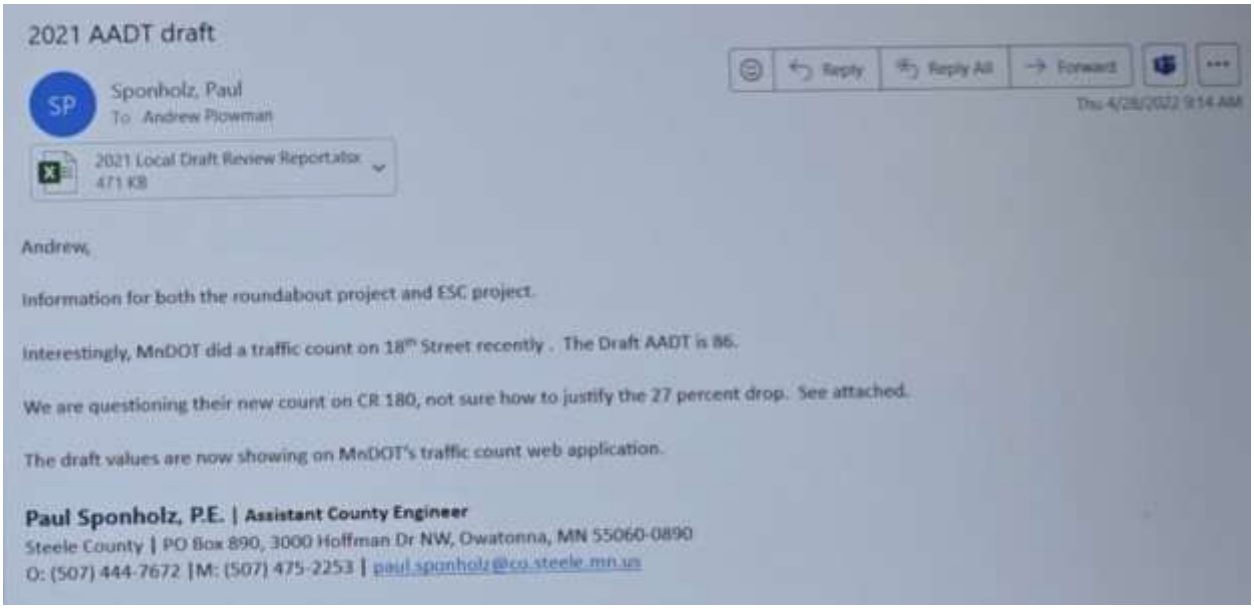
In the meantime, have you had any luck finding another public agency agreement with the same indemnification language?

Thanks for your time!
Greg



RE: Steele County, MN Agreements

EA



2021 AADT draft

SP

Sponholz, Paul
To Andrew Plowman

Reply | Reply All | Forward

Thu 4/28/2022 9:14 AM

2021 Local Draft Review Report.xlsx
471 KB

Andrew,

Information for both the roundabout project and ESC project.

Interestingly, MnDOT did a traffic count on 18th Street recently . The Draft AADT is 86.

We are questioning their new count on CR 180, not sure how to justify the 27 percent drop. See attached.

The draft values are now showing on MnDOT's traffic count web application.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | paul.sponholz@co.steele.mn.us

DEPARTMENT OF TRANSPORTATION

Memo

Date: 3/22/2023

To: Paul Sponholz
Assistant County Engineer

From: Julie Whitcher
State Rail Safety Engineer

RE: Railroad Crossing Review

Pursuant to Minnesota Rule 8830.1000 ACTIVE WARNING DEVICES; STANDARDS, USE, ALTERATION, REMOVAL, the Office of Freight and Commercial Vehicle Operation's Railroad Safety and Coordination Unit has reviewed plan sheets for new roundabout construction adjacent to the grade crossing at the location mentioned below.

Location: Bixby Rd/18th St intersection.
SP: 153-115-005
USDOT Number: 380288F

Due to restricted approaching sight visibility, and in anticipation of future development of the East Side Corridor, it is the determination of the Rail Office that the proper level of warning requires the installation of active warning devices at the reconfigured grade crossing. The warning devices shall consist of flashing lights and gates, with constant warning time circuitry and a cantilever in the NE quadrant. The railroad is responsible for designing and installing the warning devices in compliance with the MMUTCD. Advance warning signage shall be installed by the County as part of the project. Signage shall consist of W10-1 with RxR pavement markings on the westbound approach of 18th St, W10-2L on the southbound approach of Bixby Rd, and W10-2R on the northbound approach of Bixby Rd.

In the event the railroad is not able to have the warning devices installed prior to the roadway being open to the public, the Rail Office recommends maintaining the current stop configuration in both directions until the railroad signals are active. As information, the standard installation window provided by MnDOT in our signal agreements with the railroads is 18-months, materials shortages in the industry have required that timeline be extended for some projects.

The proposed trail will require warning signage at the grade crossing. This signage shall consist of stop signs and cross bucks in both directions (R1-1, 18x18x18, R15-1 24.5x4.5). The plans received by this office do not specify the distance from the back of the proposed curb to the edge of bituminous of the new trail. It appears that the trail may be in conflict with the warning device locations and should be pushed back far enough so the gate arm counterweights do not impact trail users. While there is no MMUTCD specification for this setback industry standards are generally 4'-6" from the CL of the mast to the edge of pavement.

I've attached Appendix A-7 of the State of Minnesota STIP for fiscal years 2023-2026 to provide examples of projects funded through the Section 130 Program. As you will see from these examples, the Section 130 Program is largely remedial rather than intended to provide funding to mitigate risk identified in the design or construction process.

3. Crossing Protection

Sponholz question: "[S]ince the signals/gates that the diagnostic requires is only required by our request in anticipation of the construction of the East Side Corridor in the next five years [something that is not a certainty yet], could we remove the requirement for signals/gates and leave the crossing protected by a stop sign as is current since it is a gravel township road and the ADT is only 80 vpd?"

Pursuant to Minnesota Rule 8830.1000, "[T]he commissioner [of the Department of Transportation] shall determine which devices are appropriate for the grade crossing. In determining which devices are appropriate for the grade crossing, the commissioner shall consider the type of roadway, volume of trains and vehicles per day, and visibility standards."

Attached, please find the correspondence set related to the active warning device determination made for this crossing. This correspondence set contains a Railroad Crossing Review dated 3/22/23 (original signed by MnDOT Rail Safety Engineer Julie Whitcher on the same date). Please note that, although anticipated construction of the East Side Corridor was a consideration, the determined need for an active warning device did not rest solely on the anticipated construction and was, in fact, based on several factors. Consistent with Minn. Rule 8830.1000, consideration was also given to "previous staff site visits, existing knowledge of the crossing and intersection, the plan sheet submitted to my office on February 27, 2023 (attached here as reference), the expected traffic volume as relayed to my office via email on February 7, 2023 (attached here as reference), the type of roadway, volume of trains per day, vehicles per day, [and] visibility standards[.]" (Whitcher Email to Sponholz, March 22, 2023 2:57 pm).

Although the above-referenced February 27, 2023 email and anticipated construction project were not the sole determinative factors in OFCVO's decision to require an active warning device system, the email did provide valuable context about the East Side Corridor construction effort (construction funding source, programmed construction date, projected traffic counts, and the County's safety device proposal):

> *Any determination should also consider future construction we are planning besides this project. While the existing SE 18th Street is a gravel road with only 80 vehicles/day, we have secured federal funding for our East Side Corridor project which will use SE 18th Street. That project, scheduled for construction in 2025, will reconstruct and pave SE 18th Street, and will have a projected future traffic volume of 5000 vehicles/day. As previously discussed, the county proposes to have crossing gates and flashing lights at this crossing. The existing control is only crossbucks with stop sign.*

(Sponholz Email to Whitcher, February 7, 2023 4:17:34 PM). This information was appreciated as OFCVO reviewed the overall safety of the crossing environment and provided its safety device determination.

In light of all crossing circumstances (specifically including the factors listed above), MnDOT's determination that this crossing requires an active warning device system is unchanged. Not only does safety require this level of warning at this crossing but the County was aware of this likely determination by MnDOT and proposed the same level of protection at the crossing until recently.

I will note that the Railroad Crossing Review provided a temporary safety solution in the event the crossing could not be equipped with lights and gates prior to the roadway being opened.

From: Sponholz, Paul
To: Whitcher, Julie (DOT)
Cc: Brian Osborne; Rice, Christopher (DOT); Cabral Neto, Fausto (DOT)
Subject: RE: City of Owatonna MN SE18th ST Round- Onsite Diagnostics
Date: Tuesday, February 7, 2023 4:17:34 PM
Attachments: 17953-000_sm-updated 20230103.pdf

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

Julie,

Brian Osborne from CP asked I reach out to you to determine the level of warning for the SE 18th Street crossing near Bixby Rd (CSAH 48). He is working on the preliminary engineering and plans for the crossing. Attached is the latest layout for the project.

Any determination should also consider future construction we are planning besides this project. While the existing SE 18th Street is a gravel road with only 80 vehicles/day, we have secured federal funding for our East Side Corridor project which will use SE 18th Street. That project, scheduled for construction in 2025, will reconstruct and pave SE 18th Street, and will have a projected future traffic volume of 5000 vehicles/day. As previously discussed, the county proposes to have crossing gates and flashing lights at this crossing. The existing control is only crossbucks with stop sign.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

---

From: Brian Osborne <Brian_Osborne@cpr.ca>
Sent: Monday, February 6, 2023 4:17 PM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: City of Owatonna MN SE18th ST Round- Onsite Diagnostics

Paul,
Can you please reach out to MNDOT with the latest plan-set and a request that they determine the level of warning for the proposed crossing. Please contact Julie Whitcher.

Thank You

Brian Osborne
Manager Public Works
O- 612-330-4555
C- 612-760-2945
Brian_Osborne@CPR.CA
Canadian Pacific Plaza

Comment #154

Date: December 28, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Failure to Maintain Independent Environmental Review and Consultant Role Separation

Lack of Independent Environmental Review Due to Concentration of Consultant Roles

I submit this comment to document concerns regarding the lack of independence in the environmental review of the East Side Corridor (ESC), arising from the concentration of planning, technical analysis, engineering, implementation, and public-facing communications within a single consulting firm.

This comment does not allege misconduct. Rather, it addresses a structural failure in the environmental review process that undermines the independence, objectivity, and credibility required under the Minnesota Environmental Policy Act (MEPA).

Concentration of Consultant Roles

Based on publicly available information and project documentation, WSB has played a central role in:

- Preparing or contributing to the technical studies used to justify the ESC;
- Developing related transportation infrastructure projects that are cited as background conditions or supporting need;
- Designing or providing engineering services for multiple interrelated roadway, trail, railroad, and utility projects in the same geographic area;
- Hosting and maintaining the primary public-facing project website and timeline materials for the ESC;
- Providing construction observation and engineering oversight services through a Master Services Agreement (MSA);
- Supporting utility planning and GIS implementation for Owatonna Public Utilities in corridors overlapping or adjacent to the ESC footprint.

These roles extend beyond discrete technical tasks and collectively position a single consultant to define the transportation problem, analyze the need, shape the alternatives, design related infrastructure, and present the project to the public.

The table below summarizes major transportation, utility, development, and planning projects in the ESC area and identifies the consultants associated with each.

Project	Consultant
Master Trails Study	**WSB**
Master Downtown Study	**WSB**
Imagine Owatonna	**Stantec**
East Side Corridor	**WSB**
The newly introduced 26th St. roundabout	**WSB**
Adjacent housing and commercial development identified in Imagine Owatonna	**Uknown**
Trail construction tied to the ESC footprint	**WSB**
The 18th St. railroad roundabout	**WSB**
Utility expansion and substation upgrades planned through already-segmented corridors	**WSB/OPU**
The Owatonna High School relocation and construction	**WSB**
CR 180 railroad crossing	**WHKS**
18th Street expansion	**SEH**
18th St. Trails	**WSB**
Main St. Project	**SEH**
26th St Roundabouts	**JHS**
26th St Roundabouts	**WSB**
26th St Expansion	**Bolton & Menk**
The Fire Station and Police Station	**IES**
The Havana Project	**WHKS**
Hwy 14 Expansion	**WSB**
OPU ArcGIS Enterprise Implementation	**WSB**
Engineering Oversight - MSA	**WSB**

Impact on Environmental Review Integrity

When the same consultant is responsible for identifying the problem, developing the solution, designing related projects, and communicating the project schedule and status to the public, the environmental review process risks becoming confirmatory rather than evaluative.

In this context, the Environmental Assessment Worksheet (EAW) cannot function as an independent review of environmental impacts and reasonable alternatives. Instead, it becomes constrained by prior planning assumptions, interrelated design decisions, and forward commitments embedded across multiple projects.

This concern is heightened where:

- Related projects are treated as background conditions rather than connected actions;
- Avoidance alternatives interfere with previously planned development or utility expansions;
- Environmental review is conducted after substantial planning, design, and coordination have already occurred.

Under MEPA, environmental review must occur early enough to meaningfully influence decisions. The concentration of consultant roles across planning, design, implementation, and public messaging undermines that requirement.

Public Confidence and Appearance of Predetermination

Even absent any improper conduct, the appearance of non-independence matters. The public must be able to trust that environmental review is not being guided—directly or indirectly—by entities that have already designed or are positioned to benefit from advancement of the project.

Here, the extensive overlap between ESC planning and other transportation, utility, trail, railroad, and development-related work performed by the same consultant reasonably raises questions about whether alternatives, including avoidance, are being evaluated on equal footing.

Request

For these reasons, I respectfully request that the Responsible Governmental Unit:

1. Acknowledge the concentration of consultant roles in the ESC and related projects;
2. Clarify how independence was maintained in the preparation of the EAW;
3. Confirm whether any consultant involved in prior planning, design, or implementation decisions will influence the EIS need determination; and
4. Require a **full, independent Environmental Impact Statement**, prepared with clear separation between project advocacy, design, and environmental analysis.

Only a fully **independent EIS** can restore confidence that environmental impacts, alternatives, and cumulative effects are being evaluated objectively and in compliance with MEPA.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

STEELE COUNTY
PUBLIC WORKS POLICY COMMITTEE MINUTES
Public Works Building – 3000 Hoffman Drive - Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

Tuesday, July 8, 2025 at 8:00 a.m. – Public Works Conference Room

Attendees: Commissioner Krueger, Commissioner Prokopec, Finance Director Candi Lemarr, Administrator Renae Fry, Highway Maintenance Supervisor Paul Kirtz, Interim Highway Director Alan Goodman, and Executive Assistant Rebecca Kubicek.

Information:

Interim Public Works Director spoke regarding the use of WSB Engineers through a Master Services Agreement for construction observation assistance for the two 2025 projects and assistance with plan design for the 2026 projects.

The Interim Public Works Director discussed using the sample agreement from Dodge County whereby the wind power contractors would be responsible for all repair work to the roads. Paul Kirtz will work with the townships regarding the Township Road agreements that are also found in this agreement. Alan Goodman will work with the wind power consultant to finalize the contracts and get them to Steele County Attorney for review.

Highway:

ES Corridor – Discussion regarding having an Open House on this project by the end of the year.

18th St Roundabout – The contractor has been working with Steele County and offered some flexibility to get the last leg of the project complete. The goal is to be done this year. If there is construction in the school season, Steele County will do its best to keep the road open during early morning and late afternoon movement of school traffic.

Beaver Lake - Archeological review is taking place. Work to obtain easements will continue while archaeological review is underway.

Main Street Open House: July 17th at OPU from 4 to 6 pm. Visual renderings will be available. Discussions continue regarding trails and crosswalks as the county is looking for the safest options for the public.

2025 Construction:

County lighting project is underway.

There will be 2 bituminous projects in August and one in September. County Rd. 3 will be later.

Waiting on the pavement markings contract to come back with signatures. In house technician will need to track the project completion.

There are two bridges that are closed. We were waiting for bonding which we now have and are now able to move forward. These are planned to be built next year.

Department Head Reports

Finance: Welcome Kris, new highway accountant.

PROJECTS

Owatonna ArcGIS Enterprise Implementation

Location:
Owatonna, MN

Expertise:
Technology

Services:

GIS Services

← **BACK TO PROJECTS**

Owatonna Public Utilities (OPU) has a long history of utilizing GIS for its system of record to support its customers and operations. OPU's GIS staff recognized the need to expand their GIS use beyond just a system of record to a system of engagement. OPU worked with WSB through WSB's Managed GIS Services program to perform an initial GIS assessment and then develop a Managed GIS Services plan to modernize its approach to GIS.

As part of the process to modernize their GIS, OPU wanted to migrate their existing platform into the latest and most advanced GIS technology called Esri's ArcGIS Enterprise. ArcGIS Enterprise gives OPU the resources needed to further advance their GIS goals, including a system wide GIS content management platform, resources to expand field operations, and the ability to effectively manage utility outage information. OPU also needed a robust IT infrastructure to build these programs and WSB recommended using Amazon Web Services (AWS). AWS is Amazon's secure cloud services platform that offers an advanced server environment which ensures reliability, security, and flexibility

for future development of network resources.

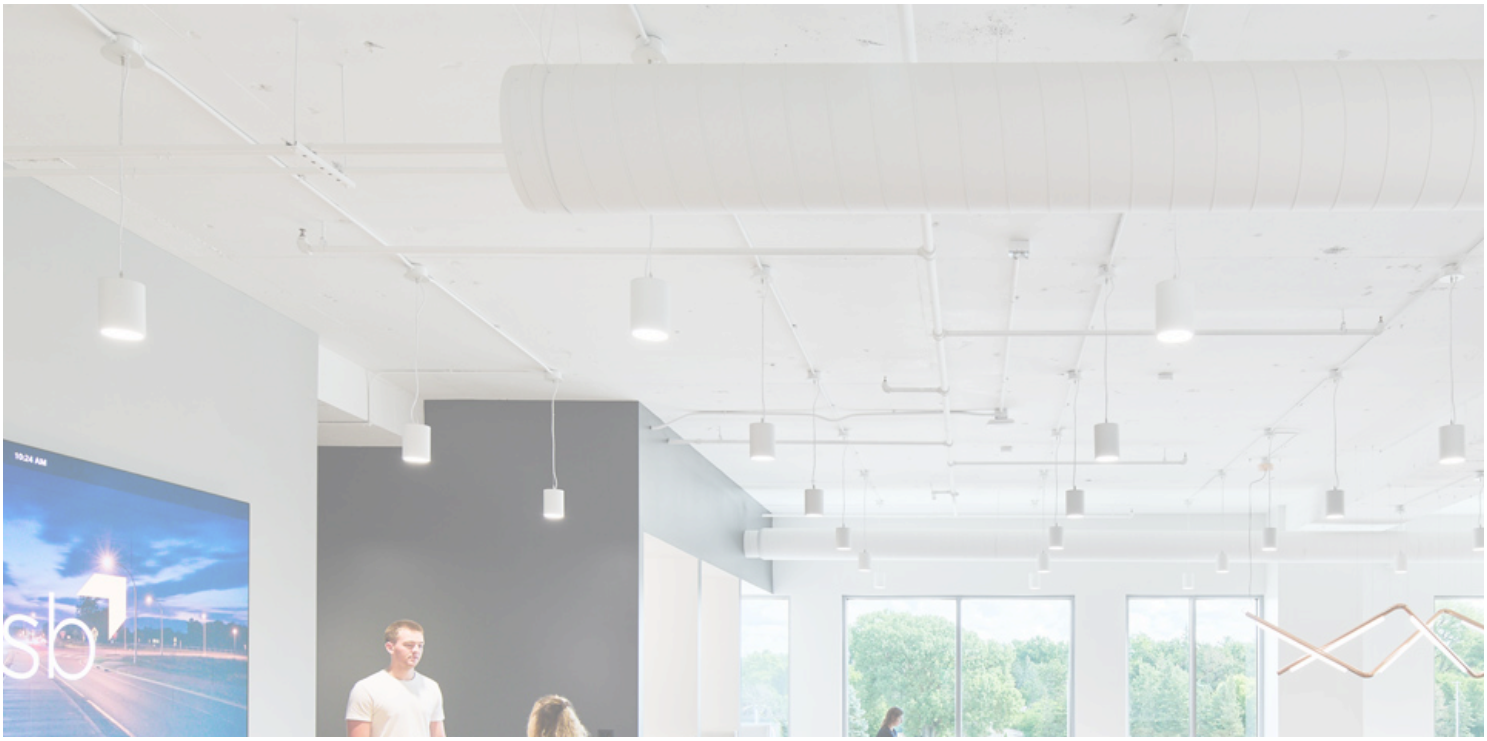
WSB tailored a plan for OPU which included the migration of their current GIS infrastructure to ArcGIS Enterprise deployed within AWS. WSB worked closely with OPU staff members throughout the project to ensure all stakeholders were involved and overall project success. By working with WSB, OPU has been able to successfully implement its ArcGIS Enterprise platform within a cloud environment, further expand its organizational use of GIS, and leverage new GIS tools and capabilities.

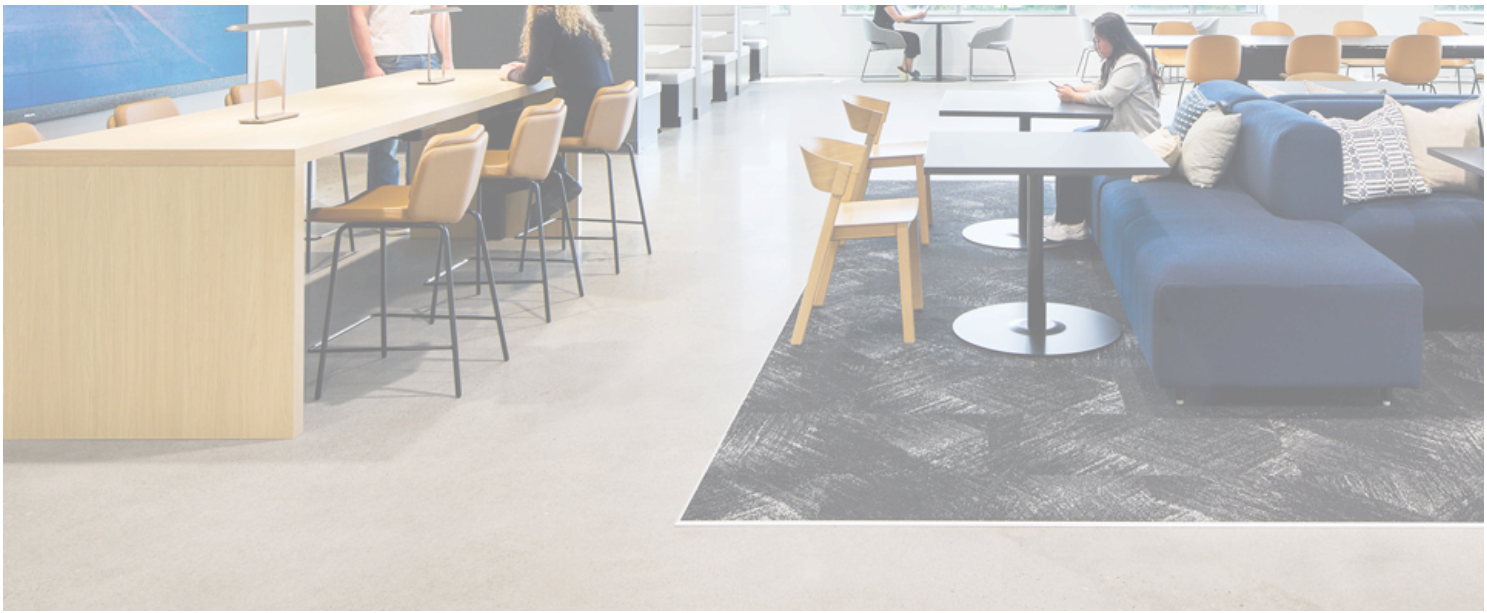
RELATED PROJECTS

Pavement Management Program Citizen's Taskforce – Meeting Facilitation, Analysis and Final Report

Bad River Watershed-Wide Wetland Functional Assessment

Lake Orono Restoration and Enhancement





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Comment #155

Loss, Destruction, and Inaccessibility of Public Data Impairing Meaningful Participation
ESC EAW Comment #43

Date: December 31, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: EAW Comment – Loss, Destruction, and Inaccessibility of Public Data Impairing Meaningful Participation

During the Environmental Assessment Worksheet (EAW) comment period for the East Side Corridor project, my ability to meaningfully review and comment on the proposed project was materially impaired due to the **loss, deletion, destruction, and subsequent corruption of public records while in the County's possession**.

On **December 9, 2025**, I inspected data provided by Steele County in response to my public data requests. During that inspection, I discovered that **more than 1,800 records that had previously existed and were known to be in the County's possession were no longer present**. These records had been available during a prior inspection of the same jump drive but were missing at the time of the December 9 inspection.

The County later claimed that the missing data had been "dropped back onto the drive." However, even if files were reintroduced, **the integrity of the data was irreparably compromised**. File structures, metadata, organization, and usability were altered such that the records could no longer be reasonably reviewed within the EAW comment timeframe.

To attempt to access the data originally, I was forced to load the files into appropriate software. This process required **approximately four hours of technical processing**, followed by **an estimated 16-20 hours of review time** merely to render portions of the data usable. This level of effort was not feasible during the limited EAW comment period and should not be required of a member of the public seeking access to public data. Additionally, the county provided a device that doesn't have the necessary software for review, making re-inspection of this data impossible.

In addition, **I explicitly requested a pause, extension, or restart of the EAW comment period on at least four separate occasions**, citing the County's failure to provide complete and usable public data. These requests were made in good faith and were intended to allow meaningful participation once the necessary records were made available. **No response was provided to any of these requests.**

As a result, I proceeded to submit comments based only on the limited and incomplete data available to me at the time. This occurred after **more than fourteen months of repeated delays, denials, and impediments to accessing public data relevant to the project**. The inability to obtain timely and usable records substantially constrained the scope and depth of public review during the EAW process.

Critically, the missing and corrupted records included materials directly relevant to the environmental review, alternatives analysis, and project decision-making. The absence and inaccessibility of this data prevented timely review and undermined my ability to submit fully informed comments during the EAW process.

MEPA requires meaningful public participation based on access to accurate and complete information. Where public data necessary to evaluate a project is deleted, destroyed, or rendered unusable while in government custody, the resulting environmental review **cannot be relied upon as complete, objective, or procedurally adequate**.

This comment is submitted to document that the EAW record was developed while key public data was unavailable or unusable due to County actions, and that this loss of data **materially impaired public participation** during the EAW comment period.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

Comment #156

Manipulation and Inconsistent Application of Truck Traffic and Noise Assumptions in the East Side Corridor Environmental Review

ESC EAW Comment #31

Date: December 29, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Manipulation and Inconsistent Application of Truck Traffic and Noise Assumptions in the East Side Corridor Environmental Review

I submit this comment to document serious deficiencies, inconsistencies, and apparent manipulation in the assumptions used to model truck traffic, noise exposure, and residential impacts for the East Side Corridor (ESC). Internal project correspondence demonstrates that key inputs affecting impact determinations were not based on verified data, were repeatedly adjusted to achieve preferred outcomes, and were later disavowed when residents identified their implications.

1. Proximity to Homes Was Known to Be Measured in Feet, Not Hundreds of Feet

Internal correspondence confirms that project staff and consultants were aware that the proposed ESC alignment would place the roadway extraordinarily close to existing homes. Emails acknowledge that the planned right-of-way is approximately 100 feet wide and that (mapped corridor is 150 with residents owning 50'), in some locations, the closest homes would be approximately **17 feet from the smaller right-of-way.**

Residents, lacking access to the same technical tools and modeling software used by engineering firms, initially measured the proximity to the right-of-way at approximately 15 feet. When WSB publicly clarified before City Council that the distance was 17 feet, residents immediately adopted the corrected figure. Despite this correction, residents' concerns regarding the extraordinary proximity—measured in feet rather than hundreds of feet—have continued to be dismissed as inaccurate or overstated, even though it was provided by the consultant.

Whether the separation is 15 feet or 17 feet is immaterial. Both distances represent an extreme and permanent encroachment that is orders of magnitude closer than separation distances typically contemplated in MnDOT noise guidance, which commonly assumes setbacks measured in **hundreds of feet**, not feet. This proximity is closer than Steele County's minimum right-of-way setbacks permit for new construction. Internal correspondence mocking the difference between 15 and 17 feet underscores the failure to appreciate the severity of proximity-based impacts when exposure occurs continuously and indefinitely.

2. Truck Traffic Percentages Were Assumed, Not Derived, and Were Repeatedly Shifted

The project's noise and traffic analyses rely heavily on assumed truck percentages rather than verified data. Residents were told that truck traffic would comprise approximately **15% of a projected 5,000 AADT**, implying roughly **750 trucks per day**.

When residents publicly performed this straightforward calculation and stated the resulting truck volume during meetings, project representatives immediately retreated from the number, characterized

it as misleading, and then discredited residents for relying on the very figures the project team had provided. This sequence demonstrates not a misunderstanding by the public, but a lack of discipline and transparency in how assumptions were communicated and defended.

Internal emails further show active discussion among consultants and staff about whether to apply **urban or rural truck mixes**, whether to default to "worst case" assumptions, and how to characterize segments so that results would remain "defensible." These discussions occurred despite the acknowledged absence of actual vehicle counts for a new alignment.

3. "Worst Case" Modeling Was Used Selectively and Strategically

Correspondence shows that project participants explicitly discussed using conservative or "worst case" assumptions in some contexts to avoid scrutiny, while in other contexts minimizing or downplaying impacts to justify advancement of the preferred alignment. This selective application undermines the credibility of the analysis.

For example, internal emails suggest applying rural truck percentages near residential neighborhoods to capture a "worst noise hour," while other portions of the project were characterized as urban to reduce perceived impacts. Such internal debates, absent transparent disclosure in the Environmental Assessment Worksheet (EAW), reveal that key outcomes depended on discretionary classification choices rather than consistent methodology.

The East Side Corridor is a single, continuous roadway and must be analyzed as such. Trucks traveling the corridor do not materially enter or exit between segments in a manner that would justify applying different vehicle mix assumptions along the same alignment. Whether a portion of the roadway is characterized as "urban" or "rural" based on curb-and-gutter design does not alter the fact that the same vehicles traverse the full length of the corridor.

Applying different truck percentages to adjacent segments of one uninterrupted roadway—based on surface design features rather than actual traffic behavior—artificially fragments the analysis and obscures real-world impacts. This approach allows modeling assumptions to be adjusted segment by segment to influence outcomes, rather than reflecting how truck traffic will actually function once constructed. For residents living along the corridor, exposure is continuous, not segmented, and truck traffic does not diminish simply because a curb is absent on one side of the road.

4. Impacts Were Known to Be Severe but Were Not Meaningfully Disclosed

Project correspondence acknowledges that most noise receptors would fall under urban truck criteria and that assumptions materially affect modeled results. Yet the EAW fails to disclose the sensitivity of outcomes to these assumptions, the lack of underlying traffic data, or the extraordinary proximity of homes to the roadway.

Noise mitigation discussions also ignore the fact that landscaping and fencing are not effective noise mitigation measures under MnDOT and FHWA guidance, particularly where homes are located within

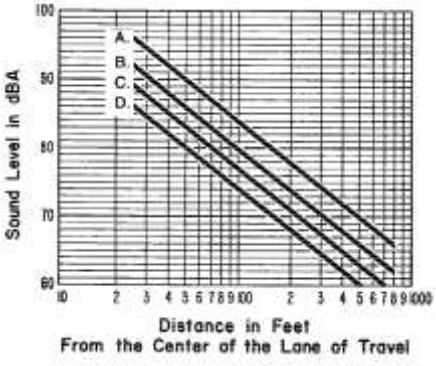
tens of feet of the roadway and where no mature, wide vegetative buffer exists or can be created within the constrained right-of-way.

5. MEPA and NEPA Require Honest Evaluation, Not Outcome-Driven Modeling

MEPA and NEPA exist to ensure that environmental consequences are evaluated honestly, consistently, and before irreversible commitments are made. When truck traffic volumes, noise exposure, and proximity impacts are based on assumed inputs that are adjusted, walked back, or selectively applied when challenged, the resulting analysis cannot be considered reliable.

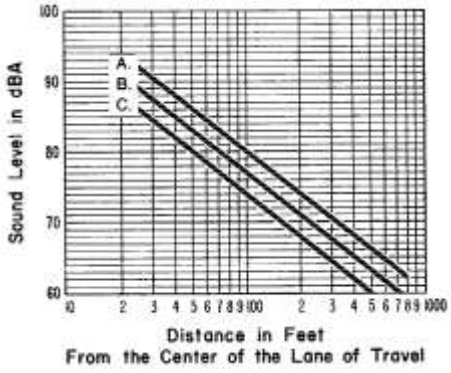
Minn. R. 7030.1040 noise guidance illustrates the magnitude of this failure. The noise charts underlying Rule 7030 indicate that separation distances on the order of **1,200 feet or more** are necessary to avoid significant heavy truck noise impacts. That distance is not hypothetical—it is consistent with the historic decision in the 1990s to move this corridor outward by approximately that amount, and it is the same separation residents have requested again to avoid permanent harm. Instead of grappling with this order-of-magnitude discrepancy, internal correspondence focuses on whether the roadway is 15 feet or 17 feet from homes.

7030.1040 NOISE LIMIT FOR VEHICLES OVER 10,000 POUNDS.



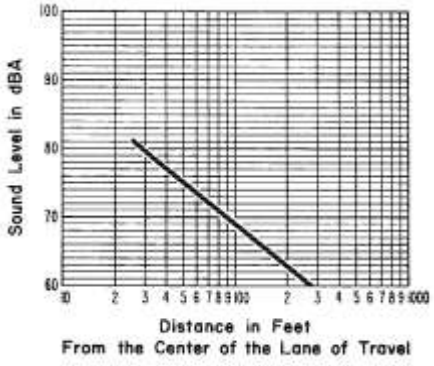
A. Speed limits greater than 35 mph.

7030.1050 MOTOR VEHICLE NOISE LIMITS FOR MOTORCYCLES.



B. Speed limits greater than 35 mph for vehicles manufactured on or after January 1, 1975.

7030.1060 NOISE LIMITS FOR OTHER VEHICLES.



Even absent heavy truck traffic, minimum residential separation distances are typically measured in the **hundreds of feet**, often on the order of **300 feet**. With the county provided projected truck volumes of approximately **750 trucks per day—roughly one truck every two minutes**—it is readily apparent why noise standards such as Minn. R. 7030.1040 reflect separation distances on the order of **1,200 feet or more** to avoid significant impacts. Even half that daily truck traffic is one truck every 4 minutes, still highlighting why distance is needed.

When residential exposure occurs at distances measured in **feet rather than hundreds or thousands of feet**, when truck traffic assumptions are unstable, and when "worst case" modeling is invoked or abandoned as convenient, the failure is not technical—it is **structural**.

Conclusion

The Environmental Assessment Worksheet fails to provide a credible evaluation of truck traffic and noise impacts because it relies on assumed and shifting inputs, inconsistent roadway classification, selective application of "worst case" modeling, and internal disagreements that were not disclosed to decision-makers or the public, further denying the public access to information and early and often participation. These deficiencies materially affect conclusions regarding impact severity, mitigation feasibility, and the comparative evaluation of alternatives.

The record demonstrates that extreme residential proximity was known, that truck traffic assumptions were not derived from verified data, and that modeling choices were adjusted or walked back when their implications were identified. When a continuous roadway is analyzed as fragmented segments to control outcomes, and when impacts measured in feet are evaluated using standards that contemplate hundreds or thousands of feet of separation, the resulting analysis cannot support informed decision-making.

These failures are not technical errors that can be corrected through clarification or minor revisions. They are **structural defects** that undermine the integrity of the environmental review and mask permanent, proximity-based impacts that cannot be mitigated through landscaping, walls, or operational adjustments.

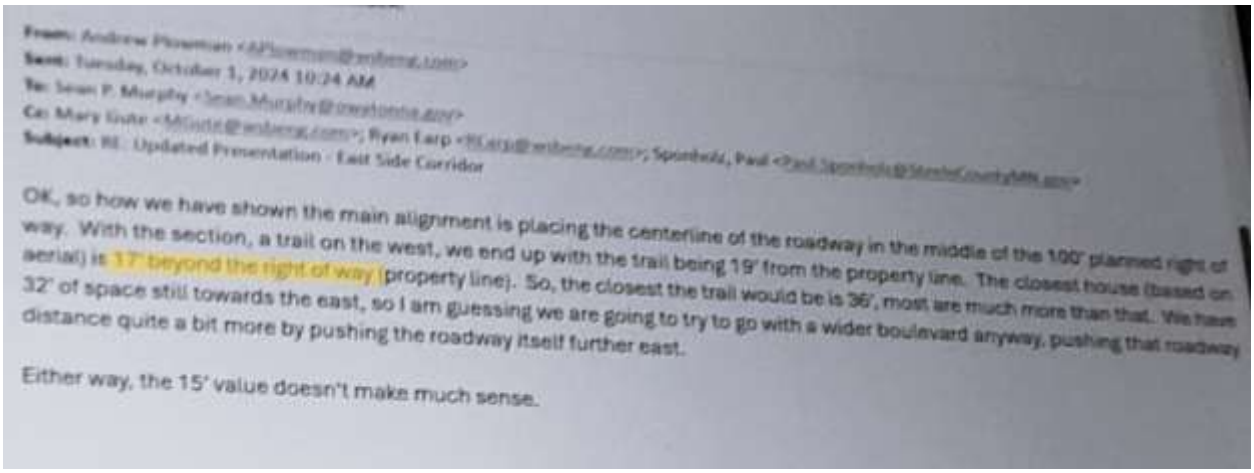
Because the EAW does not accurately disclose foreseeable truck traffic and noise impacts, does not apply consistent and transparent assumptions, and does not meaningfully evaluate avoidance alternatives that would eliminate extreme residential exposure, preparation of a **full Environmental Impact Statement (EIS)** is required. An EIS is necessary to restore analytical integrity, evaluate reasonable alternatives using consistent methodology, assess cumulative and irreversible impacts, and ensure that public health, safety, and environmental justice considerations are addressed before irreversible commitments are made.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Manipulation and Inconsistent Application of Truck Traffic and Noise Assumptions in the East Side Corridor Environmental Review

ESC EAW Comment #31

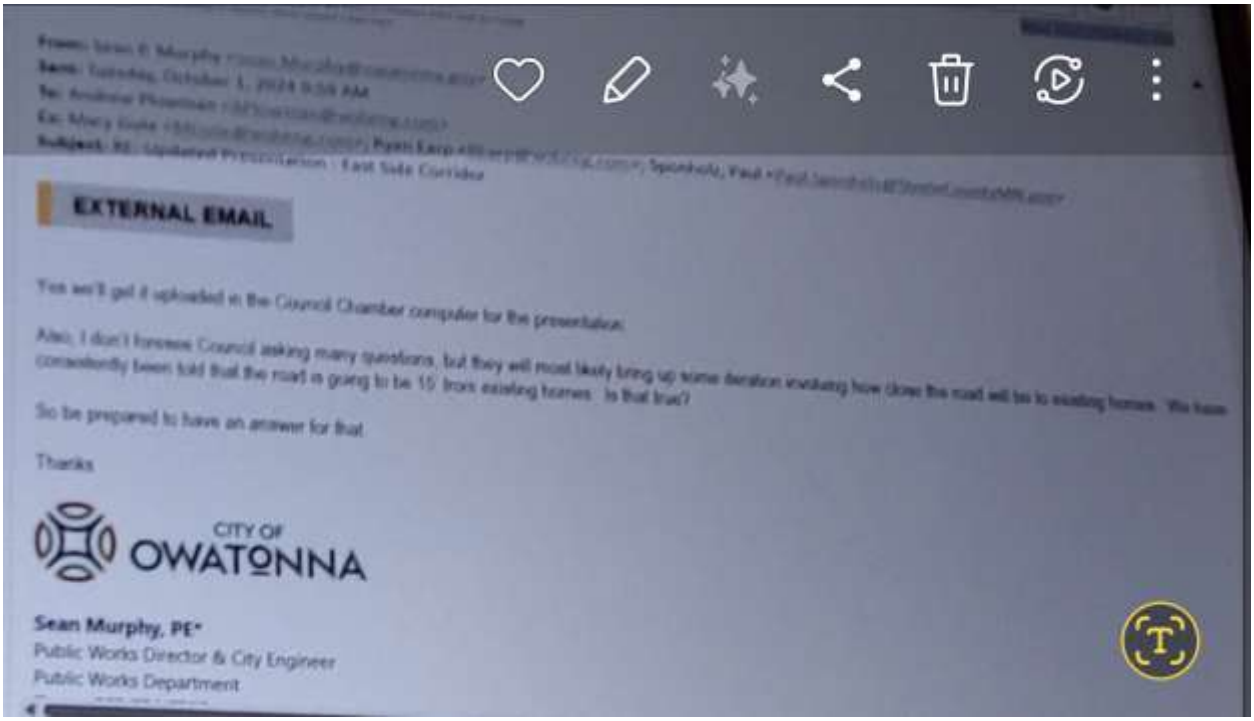
Note: *Following the Administrative Law Judge's MGDPA compliance order, substantial amounts of public records that had previously been available for inspection were no longer present for inspection and could not be retrieved despite reasonable efforts. The absence of these records prevented obtaining official copies. Accordingly, screenshots of video footage are submitted as the best available documentation of the referenced information.*



From: Andrew Plowman
Sent: October 1, 2024 10:24 AM
To: Sean Murphy
CC: Mary Gute; Ryan Erp; Sponholz, Paul
Subject RE: Updated Presentation – East Side Corridor

Ok, so how we have shown the main alignment is placing the centerline of the roadway in the middle of the 100' planned right of way. With the section, a trail on the west, we end up with the trail being 19' from the property line. The closest house (based on aerial) is 17' beyond the right of way (property line). So the closest the trail would be is 36', most are much more than that. We have 32' of space still towards the east, so I am guessing we are going to try to go with the wider boulevard anyway, pushing the roadway distance quite a bit more by pushing the roadway itself further east.

Either way, the 15' value doesn't make much sense.



From: Sean Murphy
Sent: October 1, 2024 9:59AM
To: Andrew Plowman
CC: Mary Gute; Ryan Erp; Sponholz, Paul
Subject RE: Updated Presentation – East Side Corridor

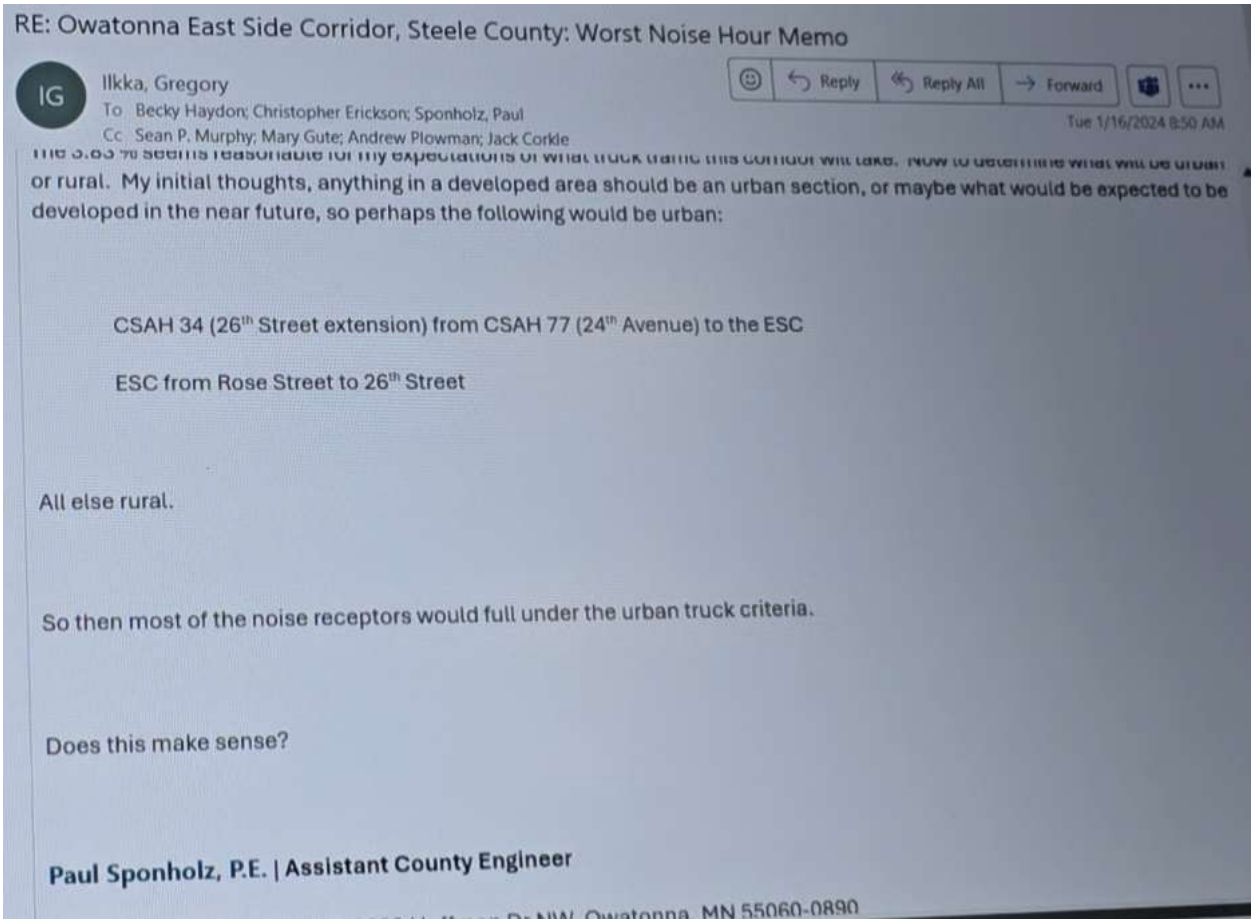
Yes, we'll get it uploaded to the Council Chamber computer for the presentation.

Also, I don't foresee Council asking many questions, but they will most likely bring up some [not sure] involving how close the road will be to existing homes. We have consistently been told that the road is going to be 15' from existing homes.

Is that true? So be prepared to answer that.

Thanks

Sean Murphy



RE: Owatonna East Side Corridor, Steele County: Worst Noise Hour Memo

IG

Ilkka, Gregory
To Becky Haydon; Christopher Erickson; Sponholz, Paul
Cc Sean P. Murphy; Mary Gute; Andrew Plowman; Jack Corkle

Reply | Reply All | Forward

Tue 1/16/2024 8:50 AM

The 3.63 % seems reasonable for my expectations of what truck traffic this corridor will take. Now to determine what will be urban or rural. My initial thoughts, anything in a developed area should be an urban section, or maybe what would be expected to be developed in the near future, so perhaps the following would be urban:

CSAH 34 (26th Street extension) from CSAH 77 (24th Avenue) to the ESC

ESC from Rose Street to 26th Street

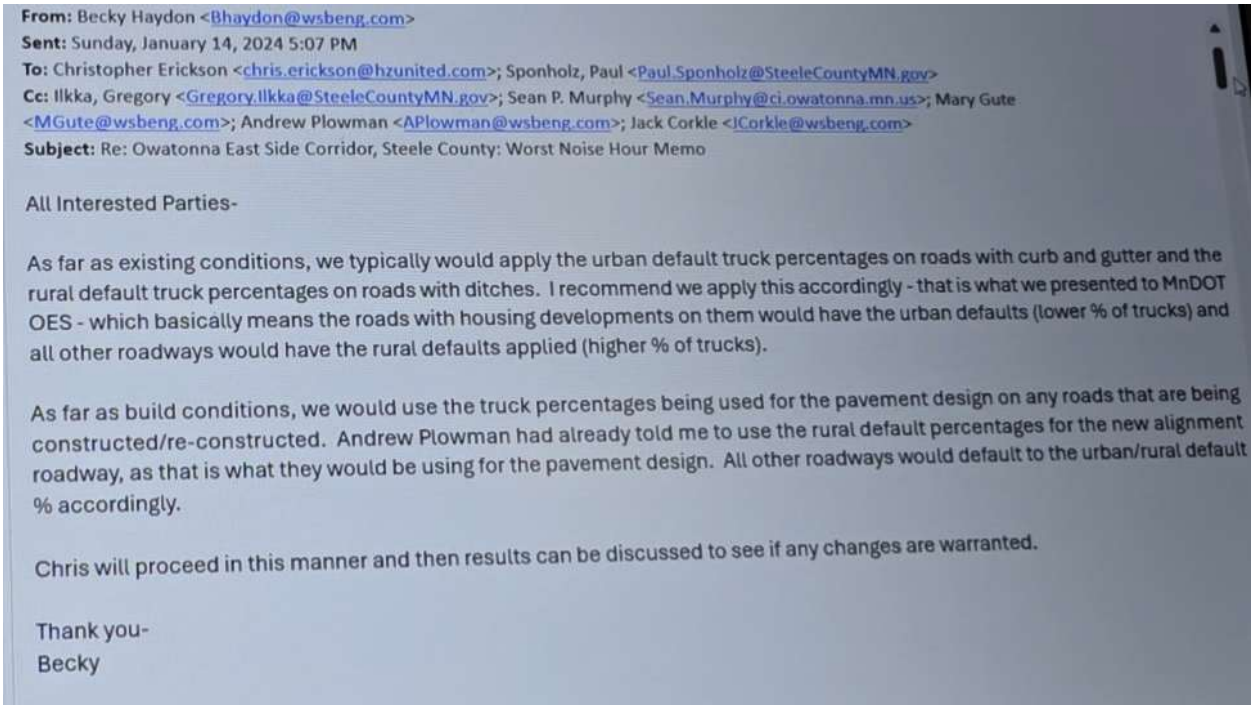
All else rural.

So then most of the noise receptors would full under the urban truck criteria.

Does this make sense?

Paul Sponholz, P.E. | Assistant County Engineer

NW, Owatonna, MN 55060-0890



From: Becky Haydon <Bhaydon@wsbeng.com>
Sent: Sunday, January 14, 2024 5:07 PM
To: Christopher Erickson <chris.erickson@hzunited.com>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Cc: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Mary Gute <MGute@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Jack Corkle <JCorkle@wsbeng.com>
Subject: Re: Owatonna East Side Corridor, Steele County: Worst Noise Hour Memo

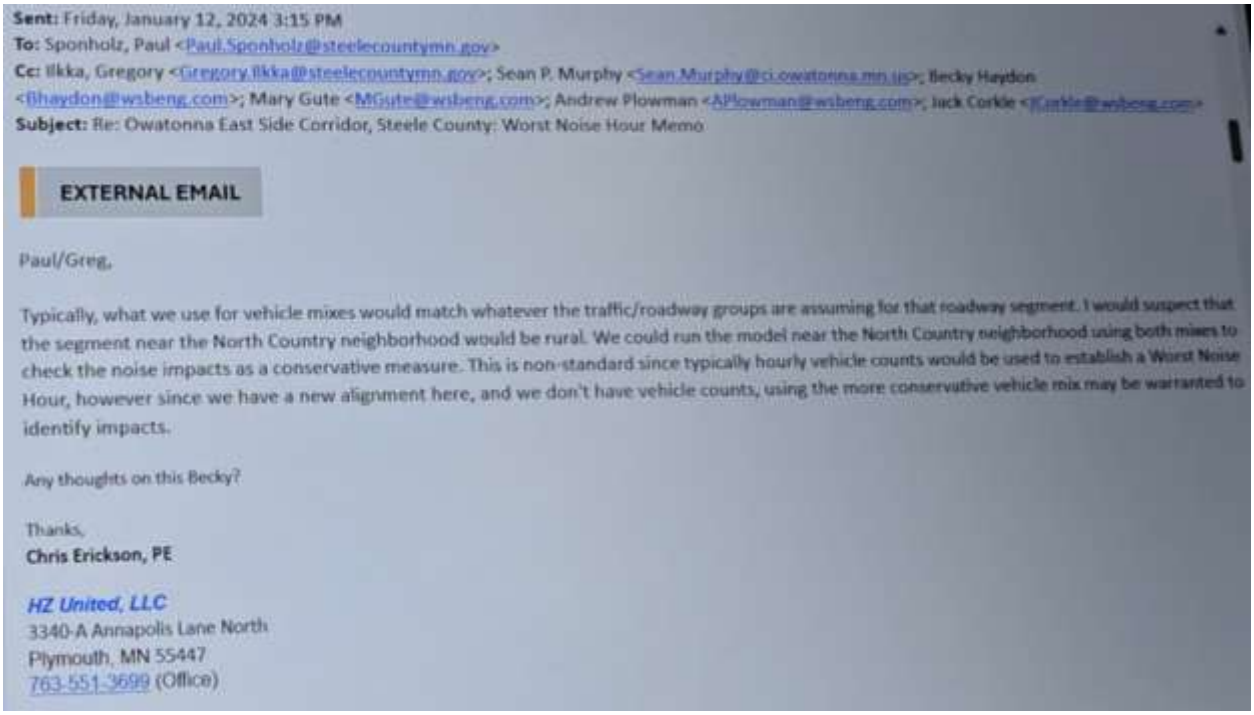
All Interested Parties-

As far as existing conditions, we typically would apply the urban default truck percentages on roads with curb and gutter and the rural default truck percentages on roads with ditches. I recommend we apply this accordingly - that is what we presented to MnDOT OES - which basically means the roads with housing developments on them would have the urban defaults (lower % of trucks) and all other roadways would have the rural defaults applied (higher % of trucks).

As far as build conditions, we would use the truck percentages being used for the pavement design on any roads that are being constructed/re-constructed. Andrew Plowman had already told me to use the rural default percentages for the new alignment roadway, as that is what they would be using for the pavement design. All other roadways would default to the urban/rural default % accordingly.

Chris will proceed in this manner and then results can be discussed to see if any changes are warranted.

Thank you-
Becky



Sent: Friday, January 12, 2024 3:15 PM
To: Sponholz, Paul <Paul.Sponholz@steelecountymn.gov>
Cc: Ilkka, Gregory <Gregory.Ilkka@steelecountymn.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Becky Haydon <Bhaydon@wsbeng.com>; Mary Gute <MGute@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Jack Corkle <JCorkle@wsbeng.com>
Subject: Re: Owatonna East Side Corridor, Steele County: Worst Noise Hour Memo

EXTERNAL EMAIL

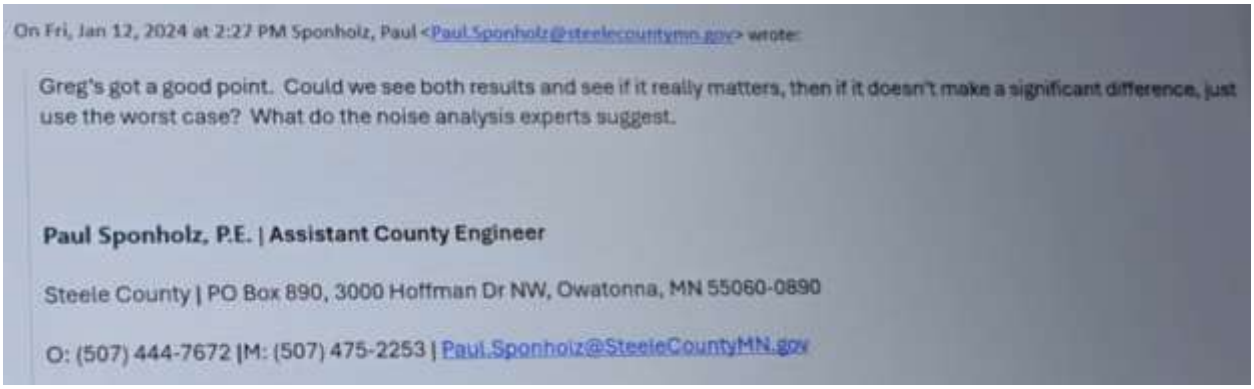
Paul/Greg,

Typically, what we use for vehicle mixes would match whatever the traffic/roadway groups are assuming for that roadway segment. I would suspect that the segment near the North Country neighborhood would be rural. We could run the model near the North Country neighborhood using both mixes to check the noise impacts as a conservative measure. This is non-standard since typically hourly vehicle counts would be used to establish a Worst Noise Hour, however since we have a new alignment here, and we don't have vehicle counts, using the more conservative vehicle mix may be warranted to identify impacts.

Any thoughts on this Becky?

Thanks,
Chris Erickson, PE

HZ United, LLC
3340-A Annapolis Lane North
Plymouth, MN 55447
763-551-3699 (Office)



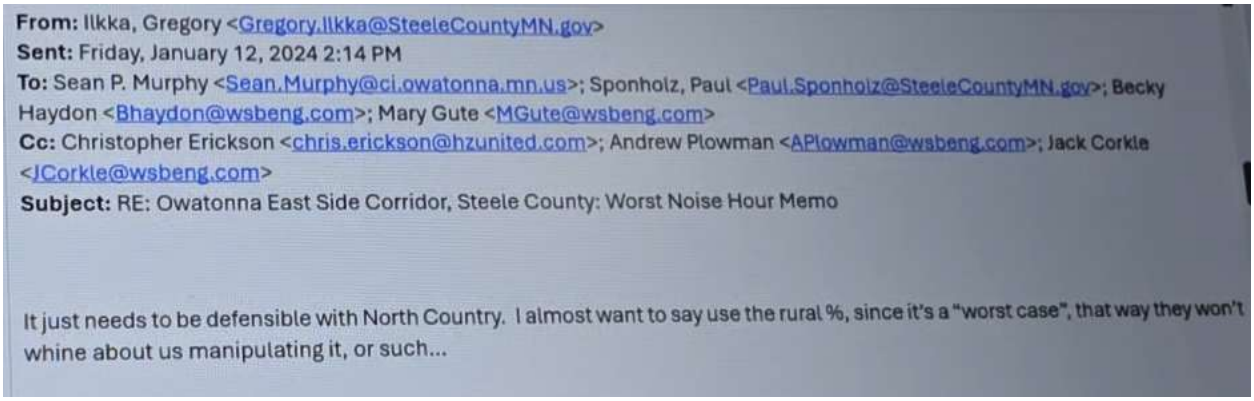
On Fri, Jan 12, 2024 at 2:27 PM Sponholz, Paul <Paul.Sponholz@steelecountymn.gov> wrote:

Greg's got a good point. Could we see both results and see if it really matters, then if it doesn't make a significant difference, just use the worst case? What do the noise analysis experts suggest.

Paul Sponholz, P.E. | Assistant County Engineer

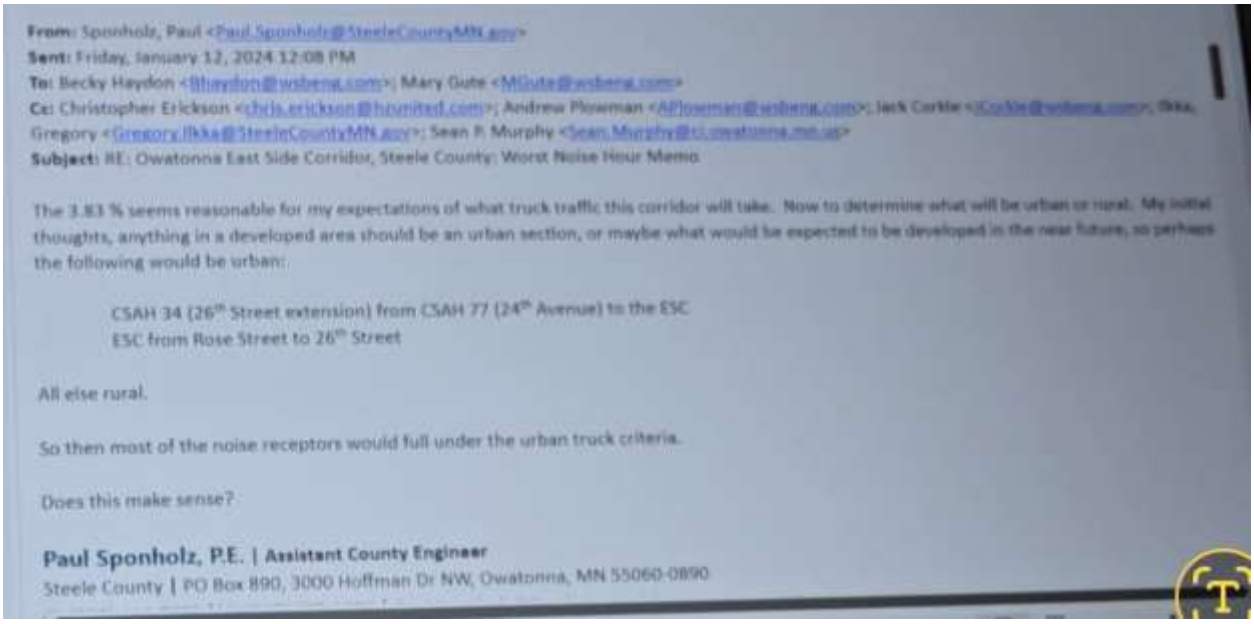
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890

O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



From: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>
Sent: Friday, January 12, 2024 2:14 PM
To: Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Becky Haydon <Bhaydon@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Cc: Christopher Erickson <chris.erickson@hzunited.com>; Andrew Plowman <APlowman@wsbeng.com>; Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Owatonna East Side Corridor, Steele County: Worst Noise Hour Memo

It just needs to be defensible with North Country. I almost want to say use the rural %, since it's a "worst case", that way they won't whine about us manipulating it, or such...



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, January 12, 2024 12:08 PM
To: Becky Haydon <BHaydon@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Cc: Christopher Erickson <chris.erickson@hounited.com>; Andrew Plowman <APlowman@wsbeng.com>; Jack Corkle <JCorkle@wsbeng.com>; Ikka, Gregory <Gregory.Ikka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>
Subject: RE: Owatonna East Side Corridor, Steele County: Worst Noise Hour Memo

The 3.83 % seems reasonable for my expectations of what truck traffic this corridor will take. Now to determine what will be urban or rural. My initial thoughts, anything in a developed area should be an urban section, or maybe what would be expected to be developed in the near future, so perhaps the following would be urban:

CSAH 34 (26th Street extension) from CSAH 77 (24th Avenue) to the ESC
ESC from Rose Street to 26th Street

All else rural.

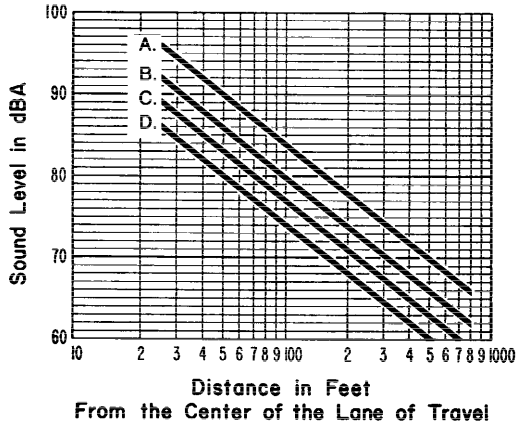
So then most of the noise receptors would fall under the urban truck criteria.

Does this make sense?

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890

7030.1040 NOISE LIMIT FOR VEHICLES OVER 10,000 POUNDS.

Motor vehicle noise limits for vehicles with a manufacturer's gross vehicle weight rating of more than 10,000 pounds and any combination of vehicles towed by such motor vehicle.



A. Speed limits greater than 35 mph.

B. Speed limits equal to or less than 35 mph and stationary run-up tests (for vehicles with governed engines). For stationary run-up tests on all-paved surfaces, add 2 dBA.

C. Speed limits equal to or less than 35 mph and stationary run-up tests (for vehicles with governed engines), for vehicles manufactured on or after January 1, 1978. For stationary run-up tests on all-paved surfaces, add 2 dBA.

D. Speed limits equal to or less than 35 mph and stationary run-up tests (for vehicles with governed engines), for vehicles manufactured on or after January 1, 1982. For stationary run-up tests on all-paved surfaces, add 2 dBA.

Statutory Authority: *MS s 116.07*

History: *18 SR 614*

Published Electronically: *December 12, 2003*

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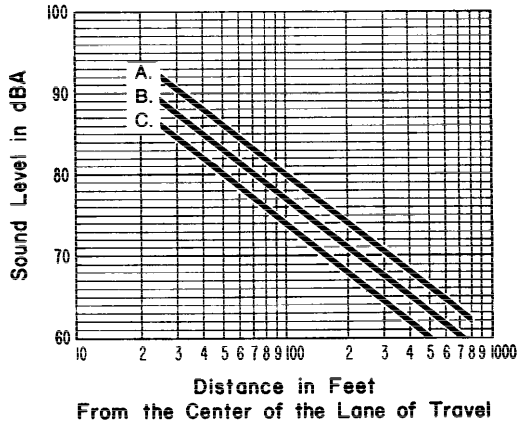
7030.1050 MOTOR VEHICLE NOISE LIMITS FOR MOTORCYCLES.



A. For vehicles manufactured before January 1, 1975.

B. Speed limits greater than 35 mph for vehicles manufactured on or after January 1, 1975.

C. Speed limits equal to or less than 35 mph for vehicles manufactured on or after January 1, 1975.

Statutory Authority: *MS s 116.07*

History: *18 SR 614*

Published Electronically: *December 12, 2003*

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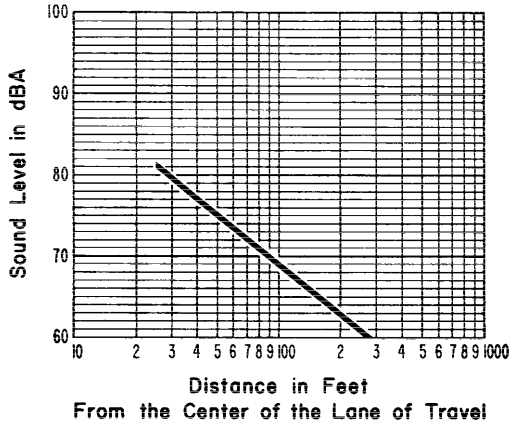
7030.1060 NOISE LIMITS FOR OTHER VEHICLES.

Motor vehicle noise limits for any other motor vehicle not included under parts 7030.1040 and 7030.1050 and any combination of vehicles towed by such motor vehicle.



Statutory Authority: *MS s 116.07*

History: *18 SR 614*

Published Electronically: *December 12, 2003*

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Comment #157

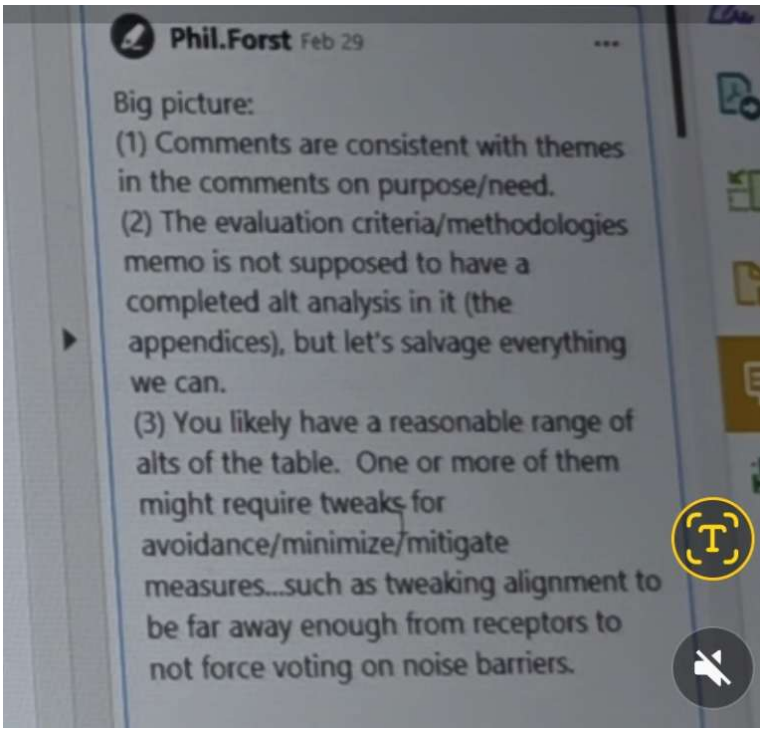
Date: December 30, 2025

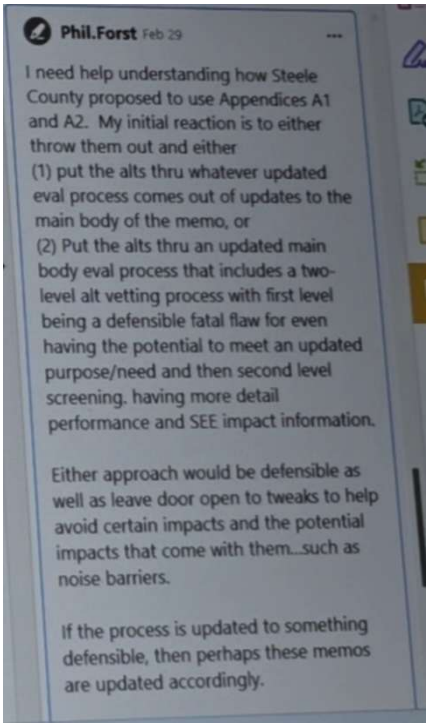
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Manipulation of Noise Mitigation Analysis and Environmental Review Process for the East Side Corridor (ESC)

I submit this comment to document serious procedural deficiencies in how noise impacts and mitigation were handled during the evaluation of alternatives for the East Side Corridor (ESC). While feasibility and cost-effectiveness analysis of noise walls is appropriate and required, the internal project record shows that noise impacts were improperly treated as *conditional*—subject to voting outcomes, funding choices, and sequencing decisions—rather than as *existing environmental impacts* that must be addressed under environmental review law.

Noise impacts do not change based on whether residents vote for a noise wall or whether federal funding is retained or abandoned. The impacts exist and, under MEPA and NEPA, must be avoided where feasible, minimized where avoidance is not possible, and mitigated where it can't be minimized, as part of the alternatives analysis. Comments within 2024 federal documentation further confirm that Steele County was placed on notice that alternatives were required to avoid impacts, yet avoidance was not consistently applied across alternatives.





1. Noise Impacts Were Treated as Conditional Rather Than Inherent

The project's own noise analysis indicates that a **20-foot noise wall is reasonable, feasible, and recommended** to address identified impacts at the Alternative 3/29th Ave location. The obligation to address those impacts exists regardless of later decisions about voting, alignment shifts, or funding sources.

However, internal correspondence shows that noise impacts and mitigation were repeatedly framed as contingent on:

- Whether a neighborhood vote occurred;
- Whether residents supported a noise wall;
- Whether federal funding was retained or eliminated.

This framing is procedurally improper. Environmental impacts are not optional, negotiable, or dependent on public voting outcomes.

---

2. Noise Mitigation Was Used to Influence Alternatives Selection

Internal communications show and avoidance option was studied and was complaint with all regulations. However, instead of avoiding, noise wall analysis and associated costs were discussed not as neutral mitigation requirements, but as variables to be adjusted, deferred, or excluded in order to influence which alignment would appear more favorable.

Examples include:

- Selective modeling of noise walls by alternative;
- Repeated adjustment of wall heights until cost-effectiveness thresholds could be rejected;
- Discussion of removing or separately presenting required mitigation costs to alter cost comparisons.

Required mitigation cannot be excluded from an alternative's cost simply because it complicates the comparison. Doing so prejudices alternatives and undermines the integrity of the environmental evaluation. Moreover, under MEPA and NEPA, environmental impacts must be avoided where feasible and mitigated where avoidance is not possible. Internal project emails demonstrate that avoidance was treated as conditional—dependent on whether residents voted for a noise wall—despite evidence that avoidance through alignment shifts was possible. Conditioning impact avoidance on a post hoc vote violates both the intent and the letter of MEPA and NEPA, which require that avoidance and mitigation be evaluated objectively and incorporated into alternatives before a preferred alternative is advanced.

3. Voting Was Improperly Positioned as a Gatekeeper for Mitigation

The internal record shows that noise wall voting was structured as:

- Occurring only after FHWA concurrence on a preferred alternative;
- A mechanism to justify changing alignments after the fact;
- A basis for determining whether mitigation would be pursued at all.

This sequencing reverses the environmental review process required under MEPA and NEPA. Voting cannot be used to determine whether known impacts will be addressed; it may only occur after impacts and mitigation have been fully disclosed and evaluated. These impacts were foreseeable, as reflected in FHWA comments (above) and the project record, yet they were not addressed prior to preferred alternative selection and were not applied consistently across alternatives as the FHWA recommended.

While Alternative 2 identified property condemnation impacts adjacent to the alignment, Alternative 3 dismissed similar but more severe impacts and did not identify condemnation, despite North Country homes existing within the alignment right-of-way. Treating identical impacts differently across alternatives constitutes prejudicial evaluation and invalidates the comparative analysis**.**

4. Federal Funding Was Treated as a Means to Avoid Mitigation Obligations

Project correspondence further shows that abandoning federal funding was discussed as a way to potentially avoid federal or state noise requirements, despite acknowledged uncertainty regarding federal permits and federal actions that could still trigger those standards.

This reflects an effort to manage regulatory exposure rather than comply with environmental obligations, further undermining the credibility of the process.

5. Withholding of Information Prevented Meaningful Public Participation

Key analyses, reports, and internal deliberations were intentionally withheld from public, only uncovered through public data, preventing affected residents from meaningfully evaluating alternatives while decisions were still open.

Conclusion

This record does not reflect a lawful evaluation of environmental impacts. Instead, it demonstrates a process in which:

- Noise impacts were treated as conditional rather than inherent;
- Mitigation was manipulated to influence cost comparisons;
- Voting and funding decisions were used to justify avoidance of impacts;
- Public participation was delayed until after alternatives were effectively selected.

Environmental review law does not permit impacts to be negotiated away. Impacts must be identified, disclosed, and avoided or mitigated **before** a preferred alternative is advanced.

After discovering the attached correspondence, residents notified elected officials on multiple occasions, placing Steele County and the City of Owatonna on notice of these deficiencies. The project nevertheless proceeded without correction.

Where, as here, the project record demonstrates predetermination, selective impact evaluation, and conditional treatment of avoidable impacts, a FONSI is legally indefensible. An Environmental Impact Statement is required to cure these defects and restore the integrity of the environmental review process.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

EXTERNAL EMAIL

Would we do a vote before finalizing the concurrence memo and submitting to FHWA so that we can determine the final need for the wall? We aren't going to build a sound wall, but if the neighborhood votes against the wall, we can move forward with the original alignment.

Include the sound wall costs in the matrix for now and we can discuss with the Committee on Monday.

So far, the idea of abandoning federal funding isn't being well received. And with the uncertainty of federal requirements in permits, not something we'll likely pursue. We'll have a better feel of that idea on Monday.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 8:50 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Paul,

I just was speaking with Jack, and the vote would not happen prior to finalizing the memo. And, I think it is fairly safe to say that most will vote for having the wall for option 3A. We don't really think it will be dependent on if they are supportive of the project or not. If I lived along that area, heck I would likely vote for the wall too.

We will include the sound wall costs separately, so it is very evident for the meeting.

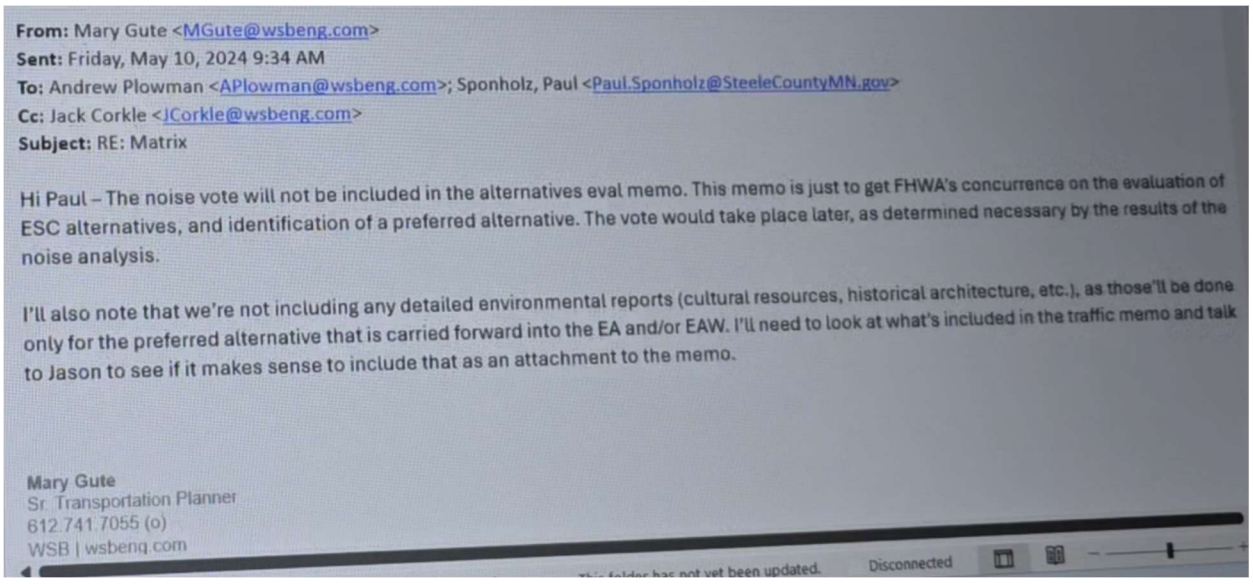
Andrew Plowman, PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
WSB | wsbeng.com

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 9:17 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Yeah sorry, to make it clear. 3A is original, 3B is (a shift at NC) and 3C (as shift at Maple Creek).

Well, we are going to show the costs separately, and the noise wall cost is just a portion of the overall analysis. But, if we choose option 3B for instance, then correct, no vote would ultimately be necessary.

I will let Mary and/or Jack chime in on the vote taking timeline. But, my understanding is that the vote would not happen ahead of time and then we change depending on the outcome.



From: Mary Gute <MGute@wsbeng.com>
Sent: Friday, May 10, 2024 9:34 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Hi Paul – The noise vote will not be included in the alternatives eval memo. This memo is just to get FHWA's concurrence on the evaluation of ESC alternatives, and identification of a preferred alternative. The vote would take place later, as determined necessary by the results of the noise analysis.

I'll also note that we're not including any detailed environmental reports (cultural resources, historical architecture, etc.), as those'll be done only for the preferred alternative that is carried forward into the EA and/or EAW. I'll need to look at what's included in the traffic memo and talk to Jason to see if it makes sense to include that as an attachment to the memo.

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

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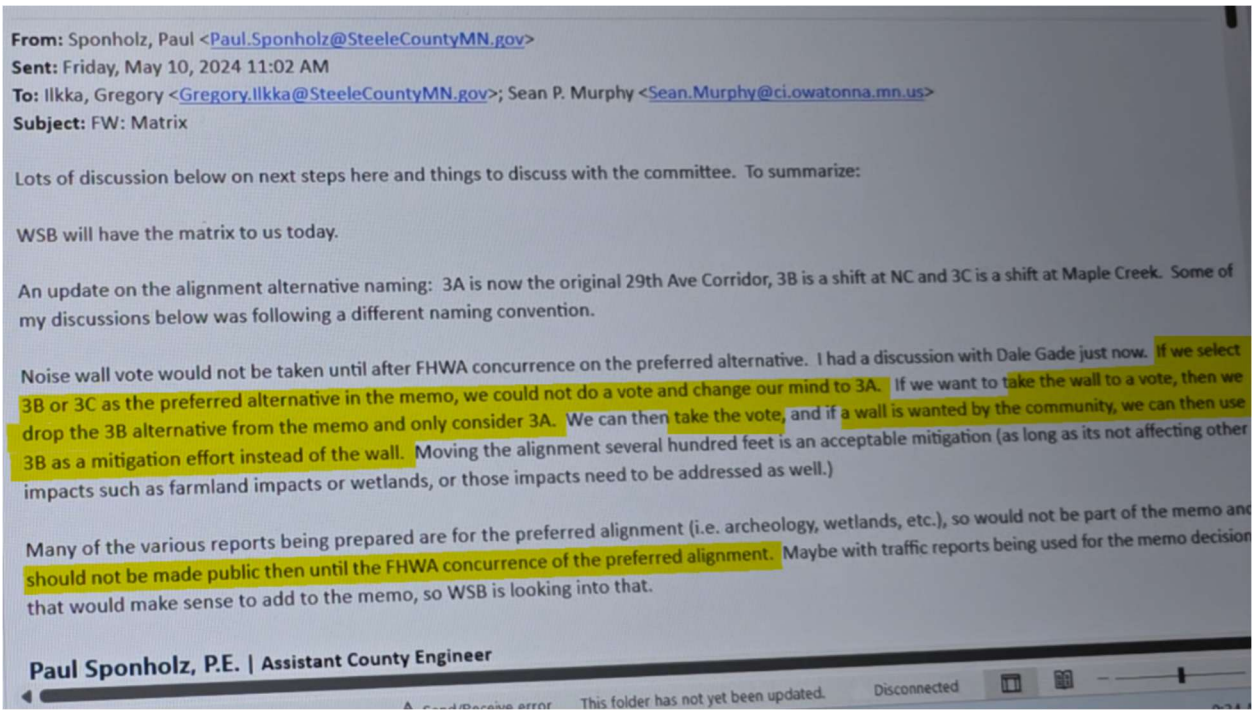

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 11:02 AM
To: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>
Subject: FW: Matrix

Lots of discussion below on next steps here and things to discuss with the committee. To summarize:

WSB will have the matrix to us today.

An update on the alignment alternative naming: 3A is now the original 29th Ave Corridor, 3B is a shift at NC and 3C is a shift at Maple Creek. Some of my discussions below was following a different naming convention.

Noise wall vote would not be taken until after FHWA concurrence on the preferred alternative. I had a discussion with Dale Gade just now. If we select 3B or 3C as the preferred alternative in the memo, we could not do a vote and change our mind to 3A. If we want to take the wall to a vote, then we drop the 3B alternative from the memo and only consider 3A. We can then take the vote, and if a wall is wanted by the community, we can then use 3B as a mitigation effort instead of the wall. Moving the alignment several hundred feet is an acceptable mitigation (as long as its not affecting other impacts such as farmland impacts or wetlands, or those impacts need to be addressed as well.)

Many of the various reports being prepared are for the preferred alignment (i.e. archeology, wetlands, etc.), so would not be part of the memo and should not be made public then until the FHWA concurrence of the preferred alignment. Maybe with traffic reports being used for the memo decision that would make sense to add to the memo, so WSB is looking into that.

Paul Sponholz, P.E. | Assistant County Engineer

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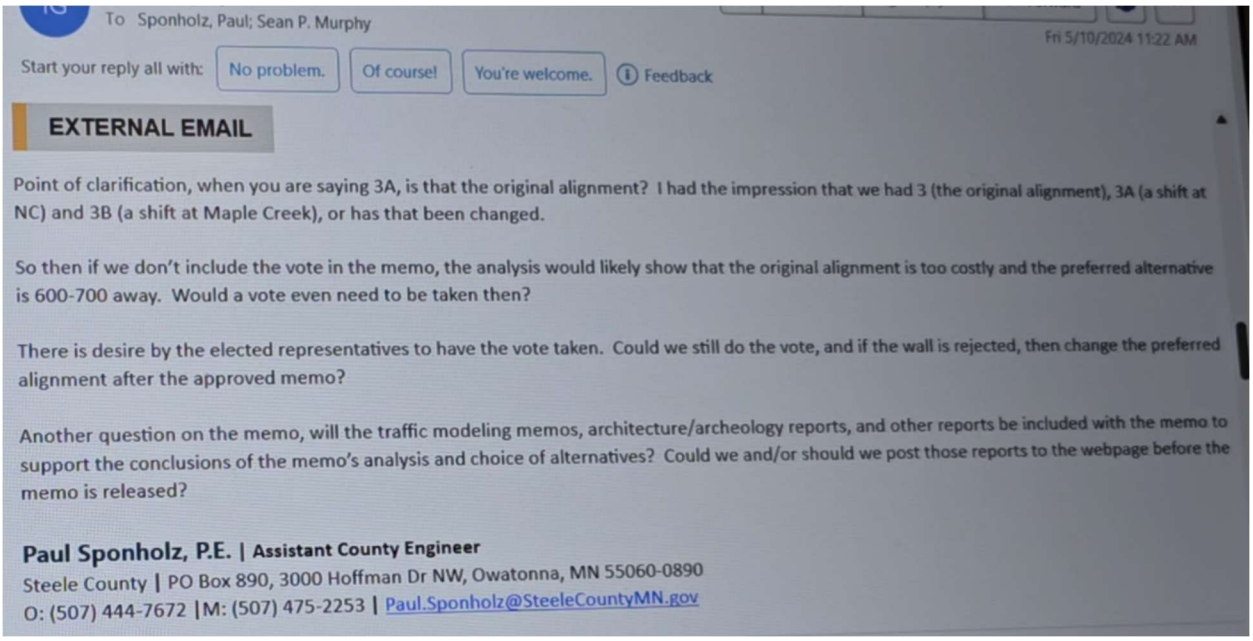

To Sponholz, Paul; Sean P. Murphy

Fri 5/10/2024 11:22 AM

Start your reply all with: No problem. Of course! You're welcome. Feedback

EXTERNAL EMAIL

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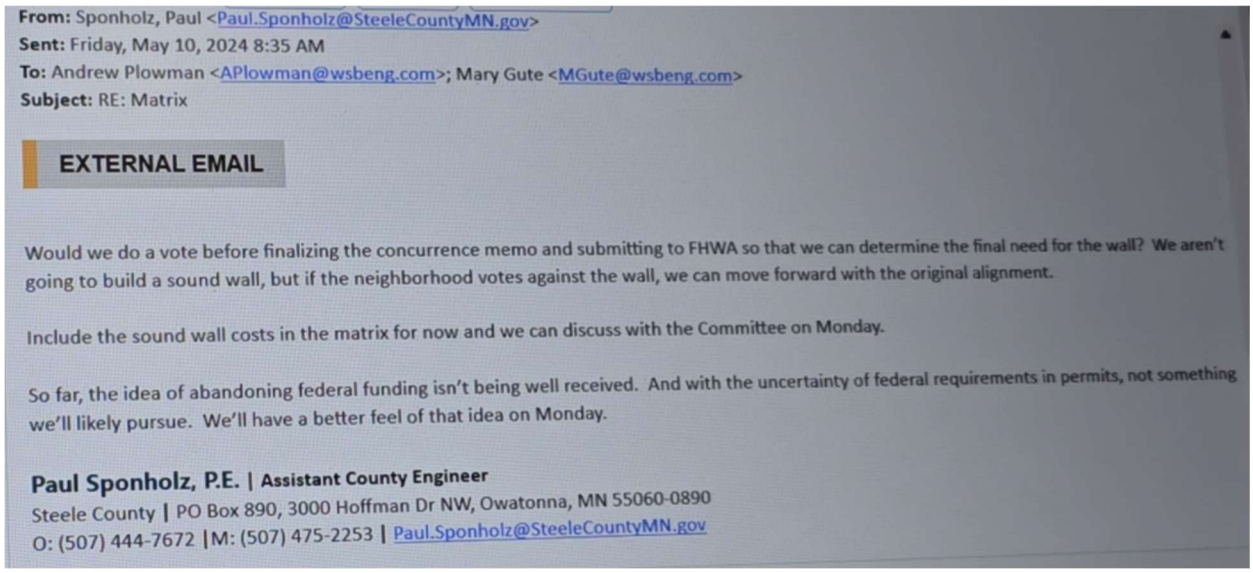

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Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

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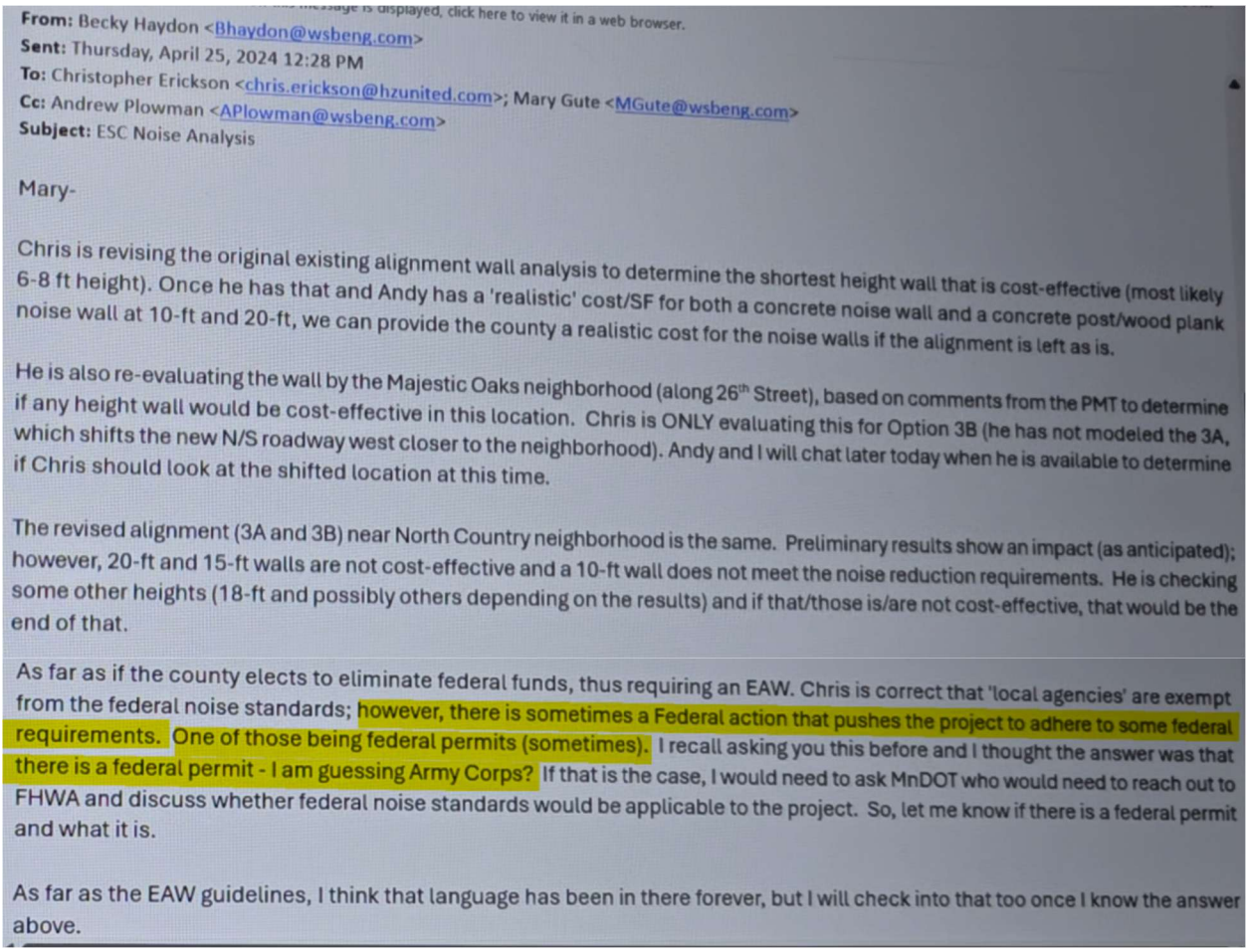

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Comment #158

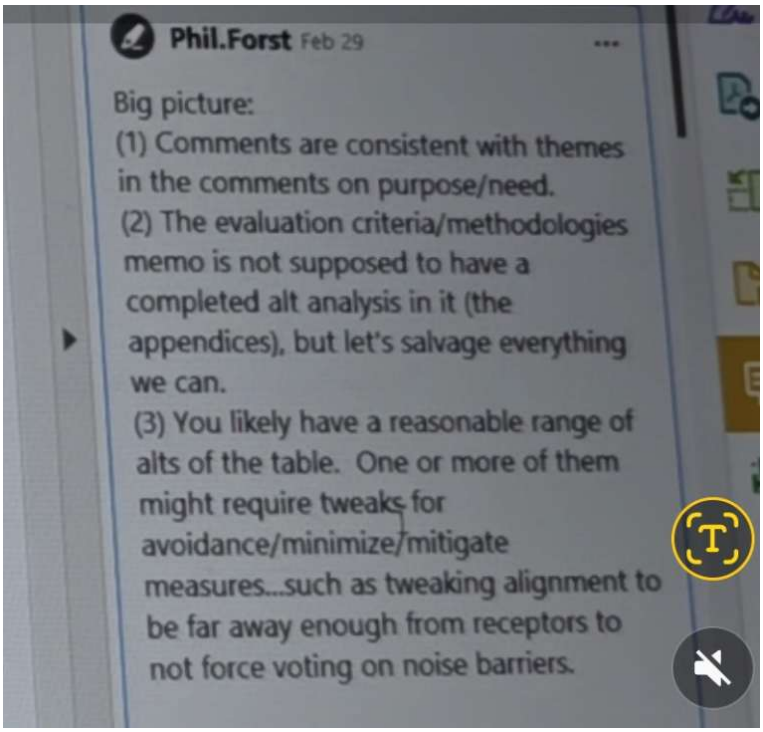
Date: December 30, 2025

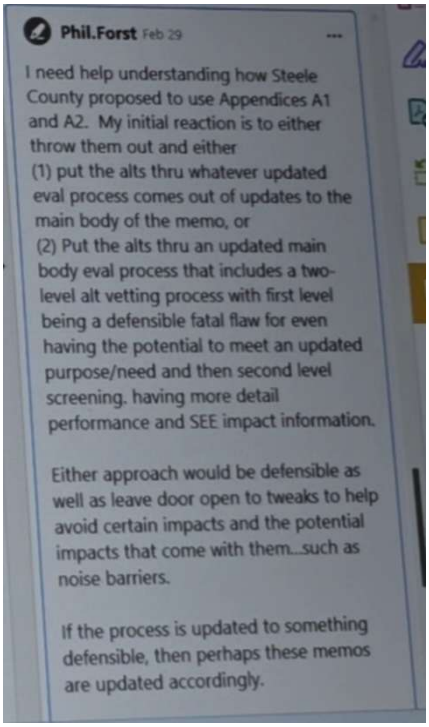
Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Manipulation of Noise Mitigation Analysis and Environmental Review Process for the East Side Corridor (ESC)

I submit this comment to document serious procedural deficiencies in how noise impacts and mitigation were handled during the evaluation of alternatives for the East Side Corridor (ESC). While feasibility and cost-effectiveness analysis of noise walls is appropriate and required, the internal project record shows that noise impacts were improperly treated as *conditional*—subject to voting outcomes, funding choices, and sequencing decisions—rather than as *existing environmental impacts* that must be addressed under environmental review law.

Noise impacts do not change based on whether residents vote for a noise wall or whether federal funding is retained or abandoned. The impacts exist and, under MEPA and NEPA, must be avoided where feasible, minimized where avoidance is not possible, and mitigated where it can't be minimized, as part of the alternatives analysis. Comments within 2024 federal documentation further confirm that Steele County was placed on notice that alternatives were required to avoid impacts, yet avoidance was not consistently applied across alternatives.





1. Noise Impacts Were Treated as Conditional Rather Than Inherent

The project's own noise analysis indicates that a **20-foot noise wall is reasonable, feasible, and recommended** to address identified impacts at the Alternative 3/29th Ave location. The obligation to address those impacts exists regardless of later decisions about voting, alignment shifts, or funding sources.

However, internal correspondence shows that noise impacts and mitigation were repeatedly framed as contingent on:

- Whether a neighborhood vote occurred;
- Whether residents supported a noise wall;
- Whether federal funding was retained or eliminated.

This framing is procedurally improper. Environmental impacts are not optional, negotiable, or dependent on public voting outcomes.

---

2. Noise Mitigation Was Used to Influence Alternatives Selection

Internal communications show and avoidance option was studied and was complaint with all regulations. However, instead of avoiding, noise wall analysis and associated costs were discussed not as neutral mitigation requirements, but as variables to be adjusted, deferred, or excluded in order to influence which alignment would appear more favorable.

Examples include:

- Selective modeling of noise walls by alternative;
- Repeated adjustment of wall heights until cost-effectiveness thresholds could be rejected;
- Discussion of removing or separately presenting required mitigation costs to alter cost comparisons.

Required mitigation cannot be excluded from an alternative's cost simply because it complicates the comparison. Doing so prejudices alternatives and undermines the integrity of the environmental evaluation. Moreover, under MEPA and NEPA, environmental impacts must be avoided where feasible and mitigated where avoidance is not possible. Internal project emails demonstrate that avoidance was treated as conditional—dependent on whether residents voted for a noise wall—despite evidence that avoidance through alignment shifts was possible. Conditioning impact avoidance on a post hoc vote violates both the intent and the letter of MEPA and NEPA, which require that avoidance and mitigation be evaluated objectively and incorporated into alternatives before a preferred alternative is advanced.

3. Voting Was Improperly Positioned as a Gatekeeper for Mitigation

The internal record shows that noise wall voting was structured as:

- Occurring only after FHWA concurrence on a preferred alternative;
- A mechanism to justify changing alignments after the fact;
- A basis for determining whether mitigation would be pursued at all.

This sequencing reverses the environmental review process required under MEPA and NEPA. Voting cannot be used to determine whether known impacts will be addressed; it may only occur after impacts and mitigation have been fully disclosed and evaluated. These impacts were foreseeable, as reflected in FHWA comments (above) and the project record, yet they were not addressed prior to preferred alternative selection and were not applied consistently across alternatives as the FHWA recommended.

While Alternative 2 identified property condemnation impacts adjacent to the alignment, Alternative 3 dismissed similar but more severe impacts and did not identify condemnation, despite North Country homes existing within the alignment right-of-way. Treating identical impacts differently across alternatives constitutes prejudicial evaluation and invalidates the comparative analysis**.**

4. Federal Funding Was Treated as a Means to Avoid Mitigation Obligations

Project correspondence further shows that abandoning federal funding was discussed as a way to potentially avoid federal or state noise requirements, despite acknowledged uncertainty regarding federal permits and federal actions that could still trigger those standards.

This reflects an effort to manage regulatory exposure rather than comply with environmental obligations, further undermining the credibility of the process.

5. Withholding of Information Prevented Meaningful Public Participation

Key analyses, reports, and internal deliberations were intentionally withheld from public, only uncovered through public data, preventing affected residents from meaningfully evaluating alternatives while decisions were still open.

Conclusion

This record does not reflect a lawful evaluation of environmental impacts. Instead, it demonstrates a process in which:

- Noise impacts were treated as conditional rather than inherent;
- Mitigation was manipulated to influence cost comparisons;
- Voting and funding decisions were used to justify avoidance of impacts;
- Public participation was delayed until after alternatives were effectively selected.

Environmental review law does not permit impacts to be negotiated away. Impacts must be identified, disclosed, and avoided or mitigated **before** a preferred alternative is advanced.

After discovering the attached correspondence, residents notified elected officials on multiple occasions, placing Steele County and the City of Owatonna on notice of these deficiencies. The project nevertheless proceeded without correction.

Where, as here, the project record demonstrates predetermination, selective impact evaluation, and conditional treatment of avoidable impacts, a FONSI is legally indefensible. An Environmental Impact Statement is required to cure these defects and restore the integrity of the environmental review process.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

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Paul,

I just was speaking with Jack, and the vote would not happen prior to finalizing the memo. And, I think it is fairly safe to say that most will vote for having the wall for option 3A. We don't really think it will be dependent on if they are supportive of the project or not. If I lived along that area, heck I would likely vote for the wall too.

We will include the sound wall costs separately, so it is very evident for the meeting.

Andrew Plowman, PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
WSB | wsbeng.com

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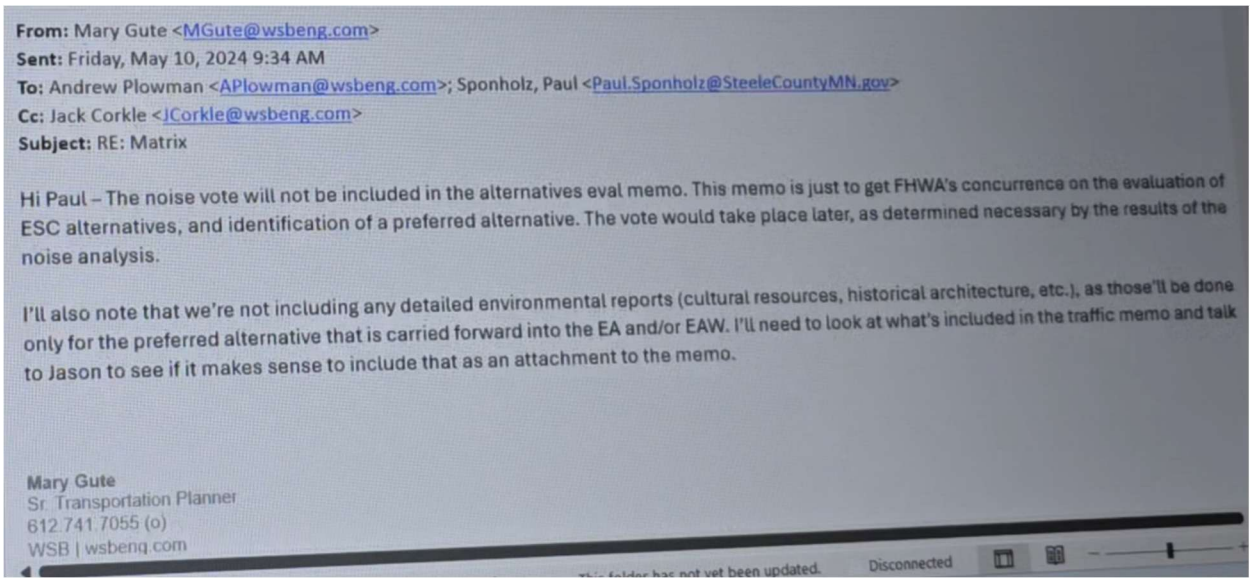
Yeah sorry, to make it clear. 3A is original, 3B is (a shift at NC) and 3C (as shift at Maple Creek).

Well, we are going to show the costs separately, and the noise wall cost is just a portion of the overall analysis. But, if we choose option 3B for instance, then correct, no vote would ultimately be necessary.

I will let Mary and/or Jack chime in on the vote taking timeline. But, my understanding is that the vote would not happen ahead of time and then we change depending on the outcome.



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Hi Paul – The noise vote will not be included in the alternatives eval memo. This memo is just to get FHWA's concurrence on the evaluation of ESC alternatives, and identification of a preferred alternative. The vote would take place later, as determined necessary by the results of the noise analysis.

I'll also note that we're not including any detailed environmental reports (cultural resources, historical architecture, etc.), as those'll be done only for the preferred alternative that is carried forward into the EA and/or EAW. I'll need to look at what's included in the traffic memo and talk to Jason to see if it makes sense to include that as an attachment to the memo.

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

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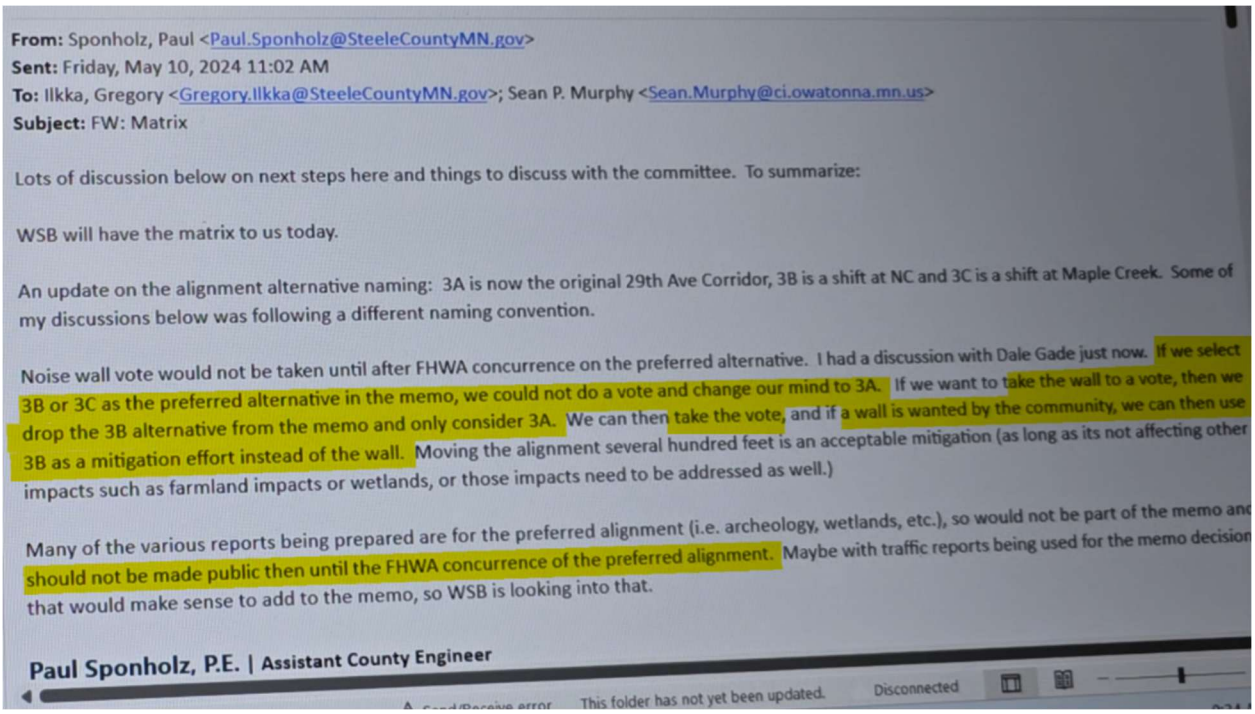

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 11:02 AM
To: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>
Subject: FW: Matrix

Lots of discussion below on next steps here and things to discuss with the committee. To summarize:

WSB will have the matrix to us today.

An update on the alignment alternative naming: 3A is now the original 29th Ave Corridor, 3B is a shift at NC and 3C is a shift at Maple Creek. Some of my discussions below was following a different naming convention.

Noise wall vote would not be taken until after FHWA concurrence on the preferred alternative. I had a discussion with Dale Gade just now. If we select 3B or 3C as the preferred alternative in the memo, we could not do a vote and change our mind to 3A. If we want to take the wall to a vote, then we drop the 3B alternative from the memo and only consider 3A. We can then take the vote, and if a wall is wanted by the community, we can then use 3B as a mitigation effort instead of the wall. Moving the alignment several hundred feet is an acceptable mitigation (as long as its not affecting other impacts such as farmland impacts or wetlands, or those impacts need to be addressed as well.)

Many of the various reports being prepared are for the preferred alignment (i.e. archeology, wetlands, etc.), so would not be part of the memo and should not be made public then until the FHWA concurrence of the preferred alignment. Maybe with traffic reports being used for the memo decision that would make sense to add to the memo, so WSB is looking into that.

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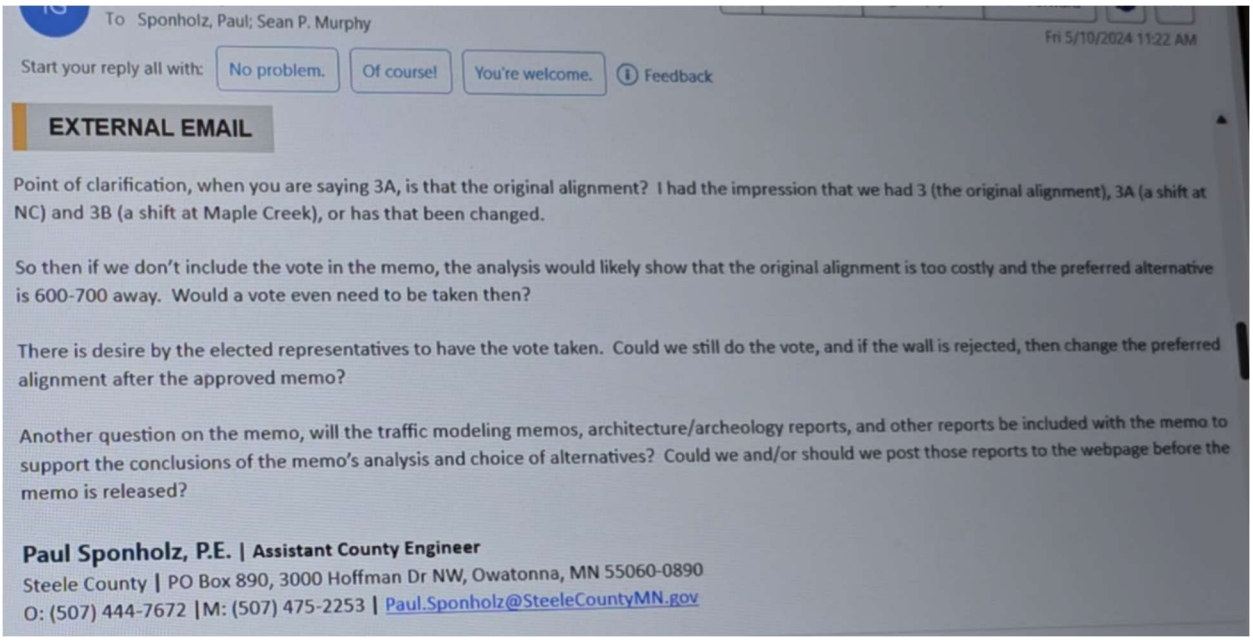

To Sponholz, Paul; Sean P. Murphy

Fri 5/10/2024 11:22 AM

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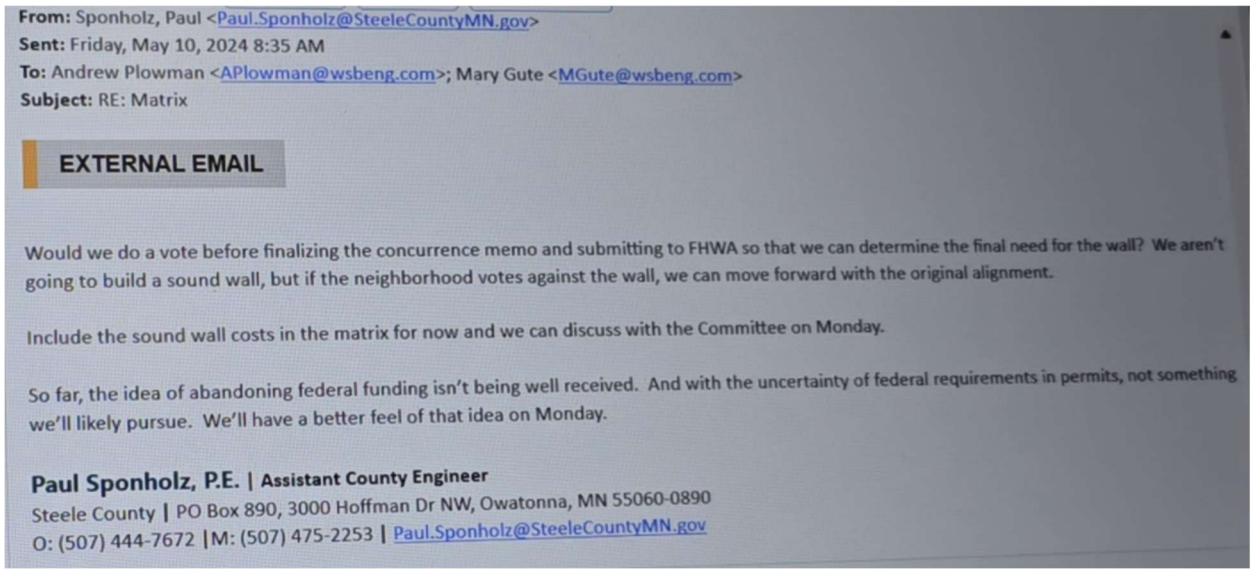

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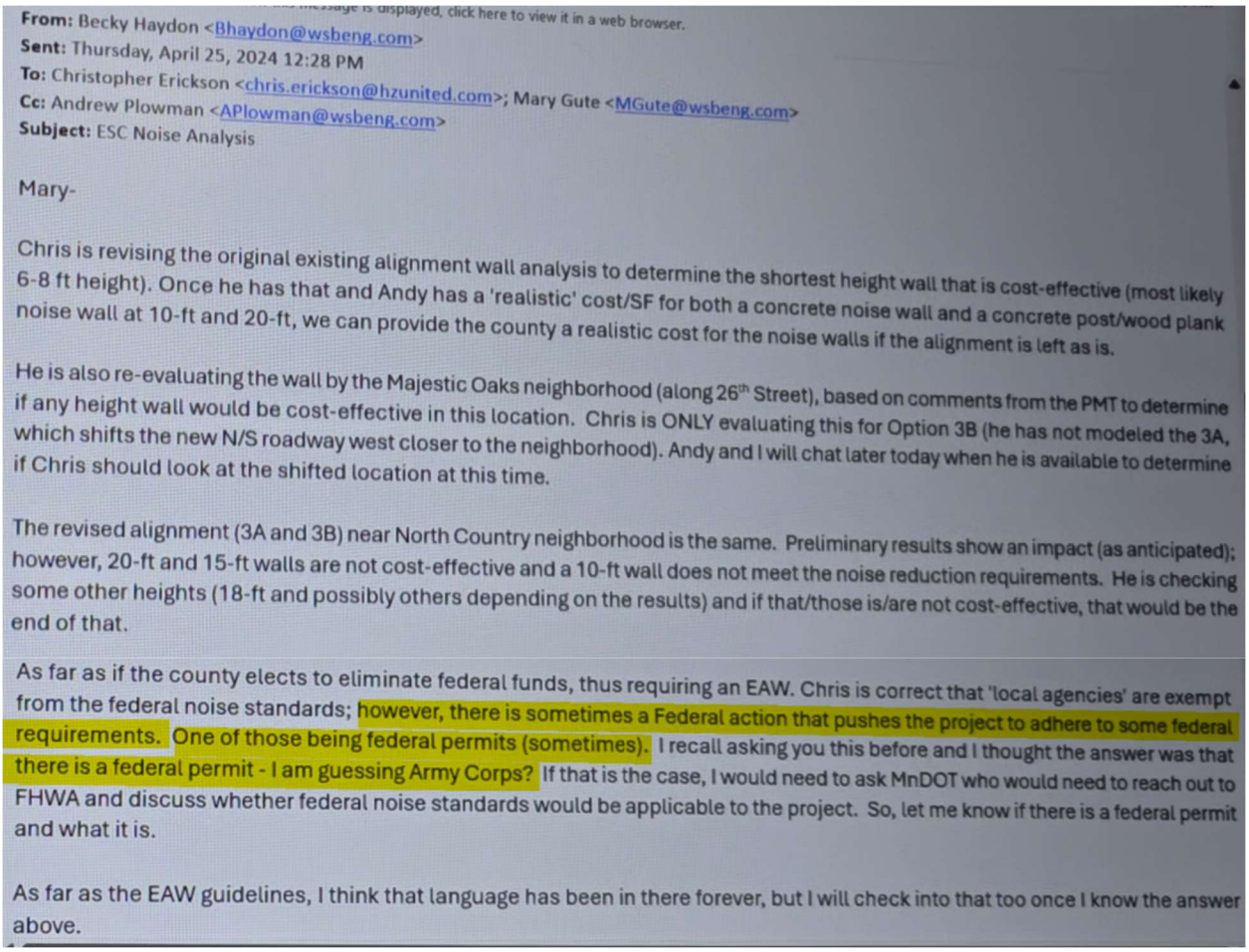

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Comment #159

Noise Impacts to Children and Educational Outcomes Near Future Elementary School Property

EAW Comment #28

Date: December 29, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Noise Impacts to Children and Educational Outcomes Near Future Elementary School Property

I am submitting this comment to raise concerns about the impacts of roadway noise on children and educational environments where the East Side Corridor would be constructed adjacent to publicly owned school property. The Environmental Assessment Worksheet (EAW) does not adequately address how increased and sustained traffic noise affects children's learning, health, and long-term educational outcomes.

A substantial body of research demonstrates that chronic exposure to transportation noise is associated with reduced reading comprehension, impaired memory, decreased attention, and lower standardized test performance in children. Noise exposure has also been linked to increased stress responses, sleep disturbance, and behavioral impacts that disproportionately affect children, who are more vulnerable to environmental stressors than adults. These effects are not limited to classroom interiors; outdoor learning spaces, recreational areas, and future school expansion areas are also affected by persistent roadway noise.

Constructing a new arterial roadway adjacent to school-owned land introduces permanent noise impacts that cannot be mitigated through temporary measures. Once established, these impacts constrain future educational use of the land and may necessitate costly retrofits or mitigation measures borne by taxpayers. The EAW does not evaluate whether projected noise levels are compatible with current or future school-related uses, nor does it analyze whether the proposed corridor would exacerbate cumulative noise exposure in an area already influenced by major transportation infrastructure.

Because the EAW references school-related traffic as part of the project context, it is essential that impacts to school property and children's learning environments be fully disclosed and analyzed. Failing to evaluate the educational and developmental consequences of roadway noise near school land understates the project's long-term environmental and community impacts and prevents meaningful public review.

Given the permanent nature of roadway noise impacts adjacent to school property, the well-documented effects of chronic transportation noise on children's learning and health, and the absence of parcel-specific and cumulative noise analysis in the EAW, an Environmental Impact Statement (EIS) is warranted. An EIS is necessary to fully evaluate noise exposure, cumulative impacts, feasible alternatives, and mitigation measures before irreversible decisions are made.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Date: December 29, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Permanent Health, Safety, and Environmental Impacts to Existing Homes

I am submitting this comment to address the permanent health, safety, and quality-of-life impacts of constructing a new arterial roadway immediately adjacent to existing homes. The proposed right-of-way is approximately 100 feet wide, rather than the approximately 150 feet typically required for a roadway of this type, resulting in an unusually narrow separation between the roadway and residences. In some locations, the right-of-way would be as close as **17 feet** (source: WSB) from residential structures, creating continuous exposure to traffic noise, air pollution, vibration, and light impacts **24 hours a day, 7 days a week**, forever. These proximity-based impacts are not adequately disclosed or analyzed in the Environmental Assessment Worksheet (EAW).

This is not a matter of neighborhood preference or opposition to infrastructure. It is a matter of public safety, human health, and livability. A substantial body of research demonstrates that chronic exposure to transportation noise is associated with increased cardiovascular risk, including significantly elevated rates of heart attack and stroke, as well as sleep disturbance, chronic stress, and cognitive impairment. These impacts are particularly severe for vulnerable populations. My household includes a family member who has already experienced a heart attack and children with disabilities whose symptoms are exacerbated by chronic noise, sleep disruption, and environmental stressors. The EAW does not evaluate how continuous roadway exposure would affect residents with existing medical conditions or disabilities.

The EAW also fails to meaningfully apply the required hierarchy of **avoidance, minimization, and mitigation**. Avoidance—relocating the roadway away from existing homes—is the only measure that would prevent permanent exposure, despite having studies it and finding it to meet all the criteria and avoid substantial impacts. Minimization is not feasible for residents because our homes already exist. We cannot reorient bedrooms or living spaces, relocate structures, or retrofit walls to highway-grade noise standards. The EAW acknowledges that such measures are often cost-prohibitive, leaving mitigation as the only remaining option.

Both MnDOT and FHWA explicitly state that landscaping and fences are not noise mitigation measures and should not be relied upon to reduce traffic noise impacts. Vegetation may provide visual screening but does not provide meaningful noise reduction, particularly in the absence of substantial distance and mature, dense buffers.

MnDOT guidance further indicates that vegetative buffers would only have any measurable noise effect where a wide buffer—on the order of at least 100 feet of mature evergreen trees—is already present at the time impacts occur. Such conditions do not exist here and cannot be

created within the proposed 100-foot right-of-way, especially where homes are as close as approximately 17 feet from the right-of-way.

Mitigation measures, such as noise walls, are inherently less effective than avoidance and impose substantial long-term costs on taxpayers. They do not address all impacts, including air pollution, light pollution, vibration, and cumulative health effects. The Vehicle Impact Analysis (VIA) does not evaluate how roadway conditions would change with the addition of a noise wall, and the EAW does not analyze secondary or cumulative impacts to disproportionately impacted residents from these exposures.

These are precisely the types of impacts the Minnesota Environmental Policy Act (MEPA) and the National Environmental Policy Act (NEPA) exist to evaluate and prevent—ensuring that development occurs in a manner that allows communities to live safely and sustainably rather than absorbing preventable harm. When residential exposure occurs at distances measured in feet and persists continuously, avoidance is the only effective protection.

This is not a matter of neighborhood preference. Constructing a high-speed roadway within approximately 17 feet of existing homes creates an environmental justice concern, for many families just like mine, by imposing disproportionate, unavoidable health and safety impacts on residents who did not create the need for the project and cannot mitigate its effects.

Because the EAW does not adequately analyze proximity-based health and safety impacts to existing homes, does not meaningfully evaluate avoidance alternatives that relocate the roadway away from residents, and understates the cumulative and irreversible nature of 24/7 exposure, an **Environmental Impact Statement (EIS) is warranted**. An EIS is necessary to fully evaluate long-term health consequences, reasonable alternatives, cumulative impacts, and fiscally responsible solutions before irreversible decisions are made.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #161

Predetermination and Misrepresentation of Alternatives
ESC EAW Comment #38

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Predetermination and Misrepresentation of Alternatives

Impacted residents met with City and County engineering staff on **May 26, 2023** to discuss the proposed project and its impacts. During that meeting, residents were explicitly told that **all project alternatives were still under consideration** and that no final alignment decision had been made.

However, just **five days later**, on **May 31, 2023**, the public open house presented the project with **a single preferred alternative**, with no meaningful discussion of other alignments or options. The short time frame between these two events makes it implausible that alternatives were still genuinely under consideration at the time of the May 26 meeting.

This sequence demonstrates **predetermination of the project alignment** prior to meaningful public engagement. Representing to residents that alternatives remained open while presenting a single preferred alternative days later undermines the integrity of the environmental review process and violates MEPA's requirement for **early, good-faith, and meaningful public participation**.

Because the EAW does not disclose or address this contradiction, it fails to provide decision-makers and the public with an accurate account of how the project was advanced and whether alternatives were properly evaluated. An environmental review process tainted by predetermination cannot support a lawful Finding of No Significant Impact (FONSI).

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

Comment #162

Date: December 28, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Predetermination and Prejudicing of Alternatives – Minn. R. 4410.3100

Improper Predetermination and Prejudicing of Alternatives

I submit this comment to document a clear violation of Minn. R. 4410.3100 arising from Steele County's approval and execution of implementation-level engineering actions for the East Side Corridor while environmental review was still ongoing.

Minn. R. 4410.3100 expressly prohibits a Responsible Governmental Unit (RGU) from taking actions that would materially prejudice the consideration of alternatives or mitigation measures before environmental review is completed. The actions approved by Steele County on May 13, 2025, violate both the letter and intent of this rule.

Additionally, residents warned the county before a vote was taken.

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1. Approval of a "Preferred Option" Before Completion of Environmental Review

On May 2, 2025, WSB submitted Contract Amendment No. 2 for the East Side Corridor. That amendment repeatedly and explicitly identifies a **"preferred option"** and **"preferred corridor,"** stating that:

- *"The right of way limits have been determined for the preferred option,"* and
- The scope includes base work *"for the preferred corridor."*

The determination of right-of-way limits for a single corridor constitutes selection, not analysis. At that point, alternatives are no longer being neutrally evaluated — they are being excluded.

This action alone materially prejudices alternatives in violation of Minn. R. 4410.3100.

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2. Authorization of Implementation-Level Design and Right-of-Way Work

The May 2 amendment — approved by the County Board on May 13 — authorizes and funds extensive implementation-level work tied exclusively to the preferred corridor, including:

- Right-of-way base mapping and title work

- Roundabout mitigation design and intersection engineering
- Right of Way mapping
- Repeat noise analysis driven by selected mitigation measures to justify roundabouts
- Bridge design, hydraulic, and floodplain design
- Soil borings to support bridge foundations

These are not preliminary or conceptual activities. They are engineering actions undertaken to advance construction of a specific alignment.

Financial commitment to these tasks — totaling over $200,000 in new expenditures and revising the contract total to over $635,000 — further locks in the chosen corridor and forecloses meaningful consideration of alternatives.

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3. **Mitigation-Driven Reanalysis Demonstrates Predetermination**

The amendment explicitly states that noise impacts were reanalyzed **because roundabouts were selected** and that:

- *"The lower speed and character of the corridor resulted in the need to re-analyze the noise impact."*

This is not environmental review guiding design. It is design driving environmental analysis — precisely what Minn. R. 4410.3100 prohibits.

Mitigation measures may not be engineered first and then used to justify a preselected alternative while other corridors remain unstudied or dismissed.

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4. Timing and Procedural Irregularity

These actions occurred while environmental review was still active and, notably, within days of the County Engineer's resignation notice. Regardless of personnel changes, the RGU remains legally obligated to maintain independent judgment, procedural integrity, and compliance with environmental review rules.

Locking in a preferred corridor, right-of-way limits, and bridge design during this period further underscores the absence of good-faith alternatives analysis.

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5. County Proceeded Despite Advance Warnings from Residents

Prior to the May 13, 2025 County Board vote authorizing the WSB contract amendment, residents explicitly warned Steele County, in writing and public comment, that approving implementation-level engineering actions before completion of environmental review would violate Minn. R. 4410.3100 by prejudicing alternatives.

These warnings were provided **before** the vote was taken and placed the County on notice that:

- the amendment selected and advanced a preferred corridor,
- right-of-way limits had been fixed,
- design and mitigation work was being authorized, and
- such actions were prohibited during ongoing environmental review.

Despite these warnings, the County proceeded with the vote and authorized the amendment without pausing, deferring, or conditioning the action on completion of environmental review.

This is not a case of inadvertent error, misunderstanding, or reliance on incomplete information. The record reflects that Steele County **knowingly proceeded after concerns were raised**, further undermining any claim of good-faith compliance with MEPA and its implementing rules.

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6. Compounding Actions That Improperly Limited Alternatives

The prejudicing of alternatives did not occur in isolation. On May 13, 2025, Owatonna Township approved a resolution limiting the project to alternatives relying on City-owned outlots associated with Preferred Alternative 3. Steele County subsequently accepted this resolution without a recorded vote on May 27, 2025.

Similarly, on December 16, 2025, the City of Owatonna approved a resolution limiting the project to a single alternative—Alternative 3—and authorized right-of-way work and cost sharing.

These actions occurred despite advance warnings. On April 23, 2025, the County Engineer documented in an email to the County Administrator, City Administrator, and City Engineer that the Federal Highway Administration (FHWA) explicitly instructed that no votes on alternatives should occur prior to completion of environmental review.

MEPA and NEPA prohibit decision-making that limits alternatives before environmental review is complete. Here, multiple governing bodies proceeded to do exactly that—after federal

guidance was communicated internally—further demonstrating predetermination and material prejudice to alternatives.

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7. Consequences

Because Steele County approved and funded actions that materially prejudiced alternatives prior to completion of environmental review, the Environmental Assessment Worksheet is **legally deficient.**

This violation cannot be cured by continuing the EAW process. Once predetermination occurs, the integrity of the review is compromised.

Accordingly, this record supports:

- rejection or invalidation of the current EAW, and
- preparation of a full Environmental Impact Statement (EIS) with **independent** oversight.

Conclusion

An EAW must inform decision-making — not ratify decisions already made. The May 2, 2025 WSB amendment and its approval on May 13, 2025 demonstrate that Steele County committed to a preferred corridor and advanced its implementation before environmental review was complete, in direct violation of Minn. R. 4410.3100.

This comment is submitted for inclusion in the official EAW record.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

EXHIBIT 1

STEELE COUNTY BOARD AGENDA

Administration Center - 630 Florence Avenue – Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

TUESDAY, MAY 13, 2025 at 5:00 PM
County Boardroom, Steele County Administration Center

Persons with background material for agenda items are asked to provide them to the Administrator's Office 5 days prior to the meeting date so that the material can be linked to the online agenda. If handouts at the Board meeting are necessary, please bring enough copies for the Board, county staff, the press and the public. Generally, 15 copies should be sufficient.

Agenda

1. Call to Order

2. Pledge of Allegiance

3. Approve Agenda

Presentation

4. UBS Financial Services Presentation (pg.5)
   – Jack Samuels, Senior Wealth Strategy Associate

5. ANR Educator Report (pg. 16)
   – Ryan Lerman, Steele/Rice Extension Educator

Public Comment

Those wishing to speak must state their name and address for the record after they are acknowledged by the Board Chair. Each person will be limited to two (2) minutes to make his/her remarks.

Speakers will address all comments to the Board as a whole and not one individual commissioner. The Board may not take action on an item presented during the Public Comment period, unless the item is already on the agenda for action. When appropriate, the Board may refer inquiries and items brought up during the Public Comment period to the County Administrator for follow-up.

Correspondence

6. Southern Minnesota Tourism Association Letter (pg. 19)

Consent Agenda - *Items listed on the Consent Agenda are considered routine and non-controversial by the County Board. There will be no separate discussion of these items unless requested by a member of the County Board.*

7. Approve April 16, 2025 Special Budget Work Session Minutes (pg. 20)
8. Approve April 22, 2025 Board Minutes (pg. 21)
9. Approve April 22, 2025 Board Work Session Minutes (pg. 29)
10. Approve Bills (pg. 31)
11. Approve Personnel Report (pg. 64)
12. Approve the On-Sale Beer License for Holy Trinity Catholic Church of Litomysl (pg. 65)
13. Adopt a Proclamation for the "National Public Works Week" (pg. 66)
14. Approve a temporary contract for a waiver and care coordinator position (pg. 68)
15. Approve a Consultant Agreement with Teya Dahl. (pg. 72)
16. Approve 2024 Feedlot Officer Annual Report and authorize the Chair to sign (pg. 76)
17. Adopt Amended Resolution 2025-003A designating UBS as Steele County's depository and authorize the persons stated to sign orders (pg. 91)
18. Adopt Amended Resolution 2025-005A Granting Annual Authority to the Finance Director to Designate Depositories and Authorize others to Conduct Banking Transactions. (pg. 93)
19. Adopt Amended Resolution 2025-004A approving the revised 2025 EFT Authorization due to personnel changes. (pg. 96)

General Agenda

20. May Anniversary Report (pg. 99)
21. Approve the sale of CCA Furniture to Choice Technical Academy in an amount of $6,000.00 and authorize Community Correction Director to sign MOU. (pg. 100)
22. Adopt a Resolution 2025-025 Amending CUP #302, Minnesota Paving and Materials and Festal Farms removing three parcels. (pg. 104)
23. Approve Agreement Amendment with WHKS & Company to complete final design for the

CSAH 2/CR 180, CSAH 43, and CR 171 Intersection Improvement and authorize the County Engineer to sign. (pg. 113)

24. Adopt Resolution requesting MnDOT to perform a speed study on CSAH 46 (CSAH 15 to MN 30) (pg. 121)
25. Approve an Amendment with WSB for Engineering Services for CSAH 48 and 18th Street SE Roundabout and authorize the County Engineer to sign. (pg. 125)
26. Approve/Adopt Agreements and easements with CPKC railroad for the work necessary to relocate and improve the SE 18th Street Rail Crossing
    a. Approve the negotiated settlement for $26,000 for the acquisition of an easement over, under, across and through a parcel of land owned by the CPKC railroad for SE 18th Street. (pg. 128)
    b. Approve Maintenance Agreement with CPKC railroad for the work necessary to relocate and improve the SE 18th Street Rail Crossing (pg. 144)
    c. Adopt Resolution 2025-027 to approve agreement with CPKC railroad and State of Minnesota for the installation of crossing signals and gates at the SE 18th Street rail crossing. (pg. 225)
27. Approve Amendment with WSB for Preliminary Engineering Services for East Side Corridor Project and Authorize the County Engineer to sign the Amendment. (pg. 239)
28. Award a contract for the 2025 CSAH 3 Resurfacing project to Crane Creek Asphalt in the amount of $586,659.97. (pg. 243)
29. Approve Disposal of Veteran Services Van (pg. 244)

County Board Work Session – Tuesday, May 13, 2025

30. Action Items

Internal Central Services Committee – Tuesday, May 6, 2025

31. Approve Administration and Annex Building hour change (pg. 249)

Information Items

32. Internal Central Services Committee Minutes (pg. 251)
33. Land Use and Records Committee Minutes (pg. 253)

Commissioner Reports:

Next Meeting Notices:

Public Safety & Health Committee – **Tuesday, May 20th at 8 a.m. in the Boardroom**

County Board Work Session – **Tuesday, May 27th at 4 p.m. in the Boardroom**

County Board Meeting – **Tuesday, May 27th at 5 p.m. in the Boardroom**

Closed Session:

The Board will be going into closed session for the purpose of labor negotiations strategy, per MN Statute Section 179A.01 & Section 13D.03

Motion to go into closed session
Discussion
Motion to end closed session
Action item (if necessary)

Closed Session:

The Board will be going into closed session for the purpose of discussing pending litigation - attorney/client privilege, pursuant to Minn. Stat. § 13D.05, Subd. 3(b)

Motion to go into closed session
Discussion
Motion to end closed session
Action item (if necessary)

Adjourn

Disclaimer: This agenda has been prepared to provide information regarding an upcoming meeting of the Steele County Board of Commissioners. This document does not claim to be complete and is subject to change.

Memorandum

To: Paul Sponholz, Steele County

From: Andrew Plowman, WSB

Date: May 2, 2025

Re: East Side Corridor Project
WSB Project No. 019850-000
Contract Amendment No. 2

Pursuant to our discussions, WSB respectfully submits this amendment request for additional design services associated with the following tasks:

- Additional Project Management and General Coordination
- Right of Way Base Mapping
- Roundabout Design/Mitigation Measures
- Noise Analysis based on Mitigation Measures
- CATEX Document
- Soil Boring near Maple Creek
- Hydraulic/Floodplain Design
- Bridge Design

The revised contract total amount is $426,044. WSB respectfully requests compensation for these additional services in the not-to-exceed amount of $209,235, resulting in a revised contract total of $635,279, as summarized below:

If this Proposal is acceptable, please issue the appropriate Amendment incorporating this letter for our review and signature.

We thank you for the opportunity to submit this Proposal and look forward to continuing to with you on this Project. If you have any questions, please let me know.

The following outlines the request for additional fee and details the scope of services for the project:

Additional Project Management and General Coordination

The project management and general coordination for the project includes additional coordination with agencies, additional project management team meetings and scheduling activities.

The total cost for this task is $16,000, which is based on 80 hours of time with an average cost per hour of $200/hr.

Right of Way Base Mapping

The right of way limits have been determined for the preferred option. Given the right of way process requires significant duration, WSB proposes to start the process by compiling the title

701 XENIA AVENUE S | SUITE 300 | MINNEAPOLIS, MN | 55416 | 763.541.4800 | WSBENG.COM

work and right of way base files. This scope would include the base work for the preferred corridor.

The total cost for this task is $32,400, which is based on 180 hours of time with an average cost per hour of $180/hr.

In addition, the expense to obtain the title reports would be included in this task, which would assume 20 parcels at $500/parcel. $10,000.

Roundabout Design/Mitigation Measures

It was determined that roundabouts would be considered at the intersections of 29th Avenue and Rose Street, Dane Avenue, 26th Street and 26th Street and Kenyon Road. This includes the design, analysis, performance checks and grading of 4 roundabouts that were previously not considered. This will not include the final design component or landscaping. We will include an additional fee in the 60% design task.

The total cost for this task is $37,800, which is based on 180 hours of time with an average cost per hour of $210/hr.

Noise Analysis based on Mitigation Measures

Roundabouts have been considered as mitigation measures for the concern with speed and operation of the corridor. This resulted in lower speeds for certain portions of the corridor that indicated noise walls may be feasible and cost effective. The lower speed and character of the corridor resulted in the need to re-analyze the noise impact.

The total cost for this task is $15,120, which is based on 84 hours of time with an average cost per hour of $180/hr.

CATEX Document

For the original design, it was assumed an EA/EAW would be required. Amendment 1 indicated the additional work required from switching the type of document and for the added effort. However, that did not include the need for completing two documents. Although they are similar in nature, they do have differences that require additional work and coordination.

The total cost for this task is $63,875, which is based on 365 hours of time with an average cost per hour of $175/hr.

Soil Boring near Maple Creek

The County was able to obtain a right of entry permit from the owner of the property at 9153 Co. Road 3, Owatonna, to complete a soil boring near Maple Creek. This will allow for preliminary design of the footings and abutments for the bridge across Maple Creek. It should be noted that additional borings will be necessary, including on the north side.

The total cost for this task is $11,000, which is based on 32 hours of crew time at $250/hr, and $3,000 of laboratory testing and reporting effort.

Hydraulic/Floodplain Design

The initial bridge design was based on hydraulic and floodplain analysis. In addition to the design, coordination has occurred with the area drainage engineer and the DNR. Some of this effort was included in the original design, but certain investigations were outside the scope, such as impact to the floodplain and how to mitigate and design the bridge.

The total cost for this task is $9,000, which is based on 40 hours of time with an average cost per hour of $225/hr.

Bridge Design

As part of the EAW and CATEX, initial bridge design was required. This included the design of the typical section, profile and initial beam design. A substantial final design will also be required for the project, which includes coordination with the bridge office and plan production.

The total cost for this task is $14,040, which is based on 54 hours of time with an average cost per hour of $260/hr.

The revised contract total amount is $426,044. WSB respectfully requests compensation for these additional services in the not-to-exceed amount of $209,235, resulting in a revised contract total of $635,279

Sincerely,

Andrew Plowman, P.E.
Sr. Project Manager

ACCEPTANCE:

Signature: _____

Title: _____

Date: _____

RESOLUTION

TOWN BOARD OF OWATONNA TOWNSHIP

WHEREAS, the Town and the City have annually adopted an orderly Annexation Agreement to provide land areas for the growth of the City and further, to provide for the protection of agricultural and other lands within the Township from urban and suburban development and to promote an organized framework for systematic annexation, and part of that agreement, the Township does not support non-farm use of the properties in the growth area, and

WHEREAS, the Preferred Alternative is largely in the defined growth areas and has less farmland impacts than the alternatives further east, and

WHEREAS, the Preferred Alternative keeps development from leapfrogging into non developed area and keeps development near existing city limits, and

WHEREAS, the Preferred Alignment best supports existing and near-term City development while preserving farmland further east, and

WHEREAS, the city dedicated land on the east side of the North County Additions 1, 2, and 3 plats preserving land for the route, and that land is already out of farmland production, further protecting additional farmland from being removed from production through other alternative routes, and

WHEREAS, Alternatives 4 and 5 presented in the environmental documents have greater farmland impacts, and would encourage development outside of the annexation agreement development areas.

NOW, THEREFORE, BE IT RESOLVED, the township does not support any other alternatives that impact farmland outside of orderly annexation agreement areas, or that do not use already-dedicated lands for the route.

BE IT FURTHER RESOLVED the Township requests that the County and City follow their previous significant planning efforts and agreements to preserve farmland and promote the orderly growth of the City.

BE IT FURTHER RESOLVED the Township supports the selection of the preferred alternative, identified as Alternative 3 as shown in the federal and state environmental documents, and commonly referred to as the 29th Avenue alignment.

ADOPTED 5-13-25 **, 2025.**

OWATONNA TOWNSHIP BOARD
Steele County, Minnesota

By: _____
Chairman

ATTEST:

By: _____
Township Clerk

CERTIFICATION

I hereby certify that the above *is* a true and correct copy of a Resolution duly passed, adopted, and approved by the Owatonna Township Board on the 13th day of May, 2025.

_____
Township Clerk

DATE: December 16, 2025
TO: Mayor and City Council
FROM: Sean Murphy, Public Works Director
SUBJECT: Resolution 88-25: Resolution of Support - East Side Corridor

Purpose:
Requesting City Council approval of Resolution 88-25: Resolution of Support for the East Side Corridor.

Background:
Steele County and the City have been exploring, via the East Side Corridor Study, ways to develop a north-south roadway closer to the currently developed and developing areas of Owatonna since 2021. This came on the footsteps of a need for the route being identified in simultaneous, but separate transportation studies by the County and City. Steele County has taken the lead on the project and further studied alternative routes through an exhaustive Environmental Study. The County and City have engaged in multiple public engagement opportunities and considered public input. Ultimately, Alternative 3 was selected.

A Resolution of Support for the East Side Corridor memorializes the City's partnership of the project, which aligns with the City's Comprehensive Plan and follows the Orderly Annexation Agreement in place with Owatonna Township.

The City's partnership is critical for this project. The next steps will include support in project development and ultimately a cooperative agreement with Steele County.

Budget Impact:
There is no cost related to the approval of the resolution of support, but understand there will be future costs associated with the project if or when it moves forward.

Staff Recommendation:
Staff recommends approval.

Attachments:
1. Resolution 88-25: Resolution of Support - East Side Corridor

RESOLUTION NO. 88-25

RESOLUTION APPROVING MUNICIPAL SUPPORT FOR EAST SIDE CORRIDOR PROJECT

WHEREAS, Steele County has, through its Capital Improvement Plan (CIP), recommended an expansion project on the east side of Owatonna, known as the East Side Corridor, to alleviate downtown congestion, improve vehicle safety and increase multimodal transportation; and

WHEREAS, Steele County and the City have, through their separate and simultaneous 2040 Transportation Plans, recommended the addition of a north-south corridor on the east side of the Owatonna Municipal Boundary; and

WHEREAS, Steele County, in consultation with the City, commenced the East Side Corridor Study to further develop the north-south route and subsequently engaged in an extensive Environmental review process conforming to Federal Highway Administration (FHWA) and Minnesota State Rules beginning in 2022 to identify and evaluate corridor locations; and

WHEREAS, Steele County and the City, together with WSB, have engaged in community engagement as part of the study and preliminary design efforts intended to gather and consider public feedback for the proposed expansion; and

WHEREAS, Steele County received concurrence in fall of 2024 on the preferred corridor, Alternative 3, which is consistent with the location of the Steele County officially mapped corridor and is approximately 2.2 miles east of CSAH 1/Cedar Avenue/CSAH 45, with deviations north of CSAH 19 (Rose Street) and south of CR 180; and

WHEREAS, the project is consistent with the City's 2050 Comprehensive Plan; and

WHEREAS, the project conforms to the orderly annexation agreement in place between the City and Owatonna Township; and

WHEREAS, prior to advertising for contractor bids on the Project, Steele County will present the City with a Cooperative Agreement for the cost sharing of the improvements; and

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Owatonna supports the selected alternative, Alternative 3; and

NOW, THEREFORE, BE IT FURTHER RESOLVED by the City Council of the City of Owatonna that the City of Owatonna supports the County continuing with the development of final plans and right-of-way acquisition necessary for the construction of the Project; and

Passed and adopted this _____ day of _____ 2025, with the following vote:

Aye _____; No _____; Absent _____.

Approved and signed this _____ day of _____, 2025.

_____

Matthew T. Jessop, Mayor

ATTEST:

_____

Jenna L. Tuma, City Administrator/City Clerk

Comment #163

Date: December 31, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Professional Review Obligations During Staff Transition

This comment is submitted to preserve the record regarding professional responsibility and continuity of environmental review during periods of staff transition. An Environmental Assessment Worksheet must be independently reviewed and verified by any professional who certifies or relies upon it.

Given the volume of identified inaccuracies, missing referenced documents, and procedural deficiencies already documented in the record, a change in signatory or the addition of a newly appointed engineer cannot cure those defects absent a full, independent review of the underlying analyses and public record. Reliance on prior certifications without adequate time for verification would be inconsistent with professional and regulatory obligations. The ESC needs a full independent EIS.

Melissa Zimmerman
Owatonna, MN
Directly Impacted Resident

Comment #164

Farmland Impact Analysis and Federal Noncompliance

ESC EAW Comment #33

Date: December 29, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: Improper Segmentation and Scope Creep Within the East Side Corridor Project (MEPA & NEPA)

I submit this comment to address improper segmentation and scope creep within the East Side Corridor (ESC) project itself. While related transportation projects have been improperly segmented from the ESC, this comment focuses on how the ESC has been advanced through phased scope slicing, deferred components, and incremental commitments that obscure the true scale, cost, and environmental impacts of the project.

Internal project correspondence demonstrates that major elements of the ESC were anticipated, discussed, and planned well before they were disclosed in environmental review documents and without public input. These include roundabouts at multiple intersections, bridge and railroad grade separation considerations, right-of-way acquisition sized to accommodate future expansion, and intersection control designed to prioritize the ESC as a primary arterial. These components were not speculative; they were treated internally as likely or expected elements to be added as traffic volumes and development increased.

Despite this, the project was repeatedly presented to the public and advanced in Capital Improvement Plans as a smaller-scale corridor with relatively modest costs. Early estimates placed construction in the range of approximately $9–13 million. Subsequent Capital Improvement Plans show escalating costs approaching $30 million, with explicit language that construction “could be divided in stages.” Yet the Environmental Assessment Worksheet does not disclose a full build-out cost, does not analyze the environmental impacts of the deferred components, and does not explain how or when those elements would be triggered.

This approach constitutes unlawful segmentation. MEPA and NEPA prohibit dividing a single project into phases or components in order to minimize apparent impacts, defer federal review, or avoid evaluating the full action. Agencies may not approve or advance an initial phase while postponing analysis of reasonably foreseeable elements that are functionally connected and integral to the project’s purpose.

Here, the roundabouts, bridges, railroad crossing, noise walls, stormwater ponds, and expanded right-of-way are not independent future projects. They are foreseeable components of the ESC corridor as designed and discussed by project engineers. Advancing the corridor while deferring environmental analysis of those elements prevents decision-makers and the public from understanding the true environmental consequences of the project.

This segmentation also explains the delayed recognition of federal undertaking status. Only after scope expansion did MnDOT CRU determine that the project constituted a federal undertaking. That sequence reflects incremental commitment rather than compliance with NEPA's requirement that federal review occur before irreversible decisions are made.

What began as a project estimated at approximately $9 million has repeatedly expanded in scope and cost, with totals exceeding $30 million, prior to May 2025's alternative limiting approvals, and major project elements continue to be added. However, the Environmental Assessment Worksheet does not disclose the full build-out cost of the project, nor does it identify the funding sources required to construct all reasonably foreseeable components. Without this information, the public and decision-makers cannot evaluate the true scale of the project or its environmental consequences.

Because the East Side Corridor has been advanced through phased scope expansion and deferred disclosure of key components, the Environmental Assessment Worksheet does not provide an adequate basis for determining that the project lacks the potential for significant environmental effects. The full corridor, including all reasonably foreseeable elements and costs, must be evaluated together and made available for the public to understand the full scope of the project. An Environmental Impact Statement is intended to study multiple projects together – the exact scenario here. An independent EIS is needed.

Melissa Zimmerman
2525 Stony Creek Dr
Owatonna, MN
Directly impacted resident

Comment #165

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Suppression of Noise Impact Discussion and Mitigation

Residents raised noise concerns during the **May 26, 2023** meeting due to the proposed roadway's close proximity to existing homes. In response, the County Engineer stated words to the effect of: **"Are you talking about a noise wall? You don't want a noise wall. Noise walls are for major roads like I-35 and Highway 14."**

This statement discouraged further discussion of noise impacts and mischaracterized the applicability of noise mitigation measures. Noise walls are not limited to interstates or major highways; they are a recognized mitigation option where warranted by proximity, traffic volumes, and predicted noise impacts.

By dismissing mitigation rather than evaluating it, the County failed to engage in a good-faith analysis of noise impacts and reasonable mitigation measures. The EAW does not adequately address how noise impacts to nearby residences will be avoided, minimized, or mitigated, nor does it explain why mitigation options were discouraged during public engagement.

Failure to properly analyze noise impacts and mitigation measures renders the EAW incomplete and precludes a lawful FONSI.

Because the County discouraged discussion of noise mitigation rather than evaluating it, and because the EAW fails to analyze whether noise impacts to residences located in extremely close proximity to the proposed roadway can be avoided, minimized, or mitigated, the EAW does not meet the requirements of MEPA. Noise impacts to residential uses are a core environmental concern, and the suppression or mischaracterization of mitigation options undermines the reliability of the impact analysis.

Where a project presents **potentially significant noise impacts to homes**, and where mitigation feasibility has not been objectively evaluated, MEPA requires preparation of an **Environmental Impact Statement (EIS)**. An EIS is necessary to fully analyze residential noise impacts, evaluate reasonable mitigation measures, and restore integrity to the environmental review process. A Finding of No Significant Impact (FONSI) would be premature and unsupported by the current record.

Melissa Zimmerman
2525 Stony Creek Dr.

Owatonna, MN
Directly Impacted Resident

Comment #166

Unreliable Traffic Data and Shifting Truck Percentages

ESC EAW Comment #42

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Suppression of Noise Impact Discussion and Mitigation

Residents raised noise concerns during the **May 26, 2023** meeting due to the proposed roadway's close proximity to existing homes. In response, the County Engineer stated words to the effect of: **"Are you talking about a noise wall? You don't want a noise wall. Noise walls are for major roads like I-35 and Highway 14."**

This statement discouraged further discussion of noise impacts and mischaracterized the applicability of noise mitigation measures. Noise walls are not limited to interstates or major highways; they are a recognized mitigation option where warranted by proximity, traffic volumes, and predicted noise impacts.

By dismissing mitigation rather than evaluating it, the County failed to engage in a good-faith analysis of noise impacts and reasonable mitigation measures. The EAW does not adequately address how noise impacts to nearby residences will be avoided, minimized, or mitigated, nor does it explain why mitigation options were discouraged during public engagement.

Failure to properly analyze noise impacts and mitigation measures renders the EAW incomplete and precludes a lawful FONSI.

Because traffic volumes and truck percentages are foundational inputs for evaluating **noise, safety, air quality, and cumulative impacts**, the use of shifting, inconsistent, and unreconciled traffic assumptions renders the EAW analytically unreliable. The failure to disclose which traffic assumptions are correct, why those assumptions changed, or how those changes affect downstream impact analyses deprives the public and decision-makers of the ability to meaningfully evaluate the project's environmental effects.

Where a project relies on **unstable or unexplained traffic data**, and where that data materially affects multiple environmental impact categories, MEPA requires preparation of an **Environmental Impact Statement (EIS)**. An EIS is necessary to establish accurate traffic assumptions, evaluate the full scope of resulting environmental impacts, and ensure that decisions are based on reliable information. A Finding of No Significant Impact (FONSI) would be premature and unsupported by the current record.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly Impacted Resident

Comment #167

Fatal Flaw in Environmental Review – Failure to Apply Avoidance and Withholding of a Reasonable Alternative
ESC EAW Comment #35

Date: December 30, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

RE: Fatal Flaw in Environmental Review – Failure to Apply Avoidance and Withholding of a Reasonable Alternative

I submit this comment to document fatal procedural deficiencies in the environmental review for the East Side Corridor (ESC). The project record demonstrates that environmental impacts were known, avoidance was studied, and yet avoidance was not implemented or made public. Instead, it appears city and township development agreements were prioritized over the inherent environmental effects that must be avoided or mitigated under MEPA and NEPA.

Known Impacts and Failure to Implement Avoidance

Noise and displacement impacts associated with the ESC were foreseeable and known. Internal correspondence and federal documentation confirm that avoidance through alignment shifts was studied and understood to be feasible. The need for avoidance was known as early as **June 2023** and formal maps were finalized by **June of 2024** – both prior to the selection of the preferred alignment in **September of 2024**.

Rather than implementing avoidance, project leadership treated avoidance as conditional, despite the fact that impacts exist regardless. This approach was driven in part by the City's preference to retain the alignment in its original location, not by objective environmental considerations, as seen in the attached emails.

Under MEPA and NEPA, impacts must be avoided where feasible, minimized where avoidance is not possible, and mitigated as part of the alternatives analysis. Withholding viable avoidance options from the public violates both the intent and the letter of environmental review law.

Unequal Application of Impacts Across Alternatives

Impacts were not applied consistently across alternatives. **Alternative 2** explicitly identified condemnation of properties adjacent to the alignment. **Alternative 3**, however, dismissed comparable impacts and did not list condemnation, despite North Country homes existing **on the mapped right-of-way**.

Applying different impact assumptions to similarly situated alternatives constitutes prejudicial evaluation and invalidates the alternatives comparison.

Improper Sequencing and Withheld Impact Data

Avoidance must be addressed early in the environmental review process where known impacts exist. Comments on preliminary drafts of the Preferred Alternative Memorandum show that the **FHWA expressly warned the Responsible Governmental Unit (RGU)** that alternatives needed to be adjusted to **avoid impacts**. Rather than adhering to this direction, decision-makers instead chose to condition impact response on a future noise wall vote by residents.

This approach reverses the proper environmental review sequence. **Voting cannot be used to determine whether documented environmental impacts will be addressed.** Impacts must first be identified, fully disclosed, and avoided or mitigated **before** a preferred alternative is advanced. Conditioning avoidance on a post-hoc vote substitutes political convenience for environmental compliance and violates the core requirements of MEPA and NEPA.

Noise impacts do not change based on whether residents vote for a noise wall or whether federal funding is retained or abandoned. The impacts exist and remain regardless of funding structure or voting outcomes, and therefore must be addressed through **avoidance, minimization, or mitigation** as part of a lawful alternatives analysis.

Despite this, known noise impacts are not disclosed in the EAW. Further, during the EAW comment period, residents have been improperly denied access to noise studies through public data requests, preventing meaningful review and comment. At the same time, the EAW asserts that Steele County is exempt from state noise regulations, even though the project has been declared a **federal undertaking** and previously used federal funding, federal studies, and federal approvals as its foundation. Any asserted exemption under Minn. Stat. § 116.07 is therefore inapplicable, and the project must comply with federal environmental and noise regulations.

The combined effect of improper sequencing, withheld impact data, and inconsistent regulatory treatment deprives the public of meaningful participation and precludes any lawful Finding of No Significant Impact.

Withholding of a Reasonable Avoidance Alternative

The environmental review contains a fatal defect in that a reasonable avoidance alternative was deliberately withheld from public disclosure. Internal records show that in July 2024 Steele County removed an alignment shift at North Country (**Alternative 3B**) from public-facing materials (attached), despite continued internal discussion and analysis. Additional correspondence (attached) demonstrates that other impact-related decisions—such as subdivision connections affecting North Country residents—were similarly concealed, establishing a pattern of intentional suppression rather than an isolated oversight.

Notably, alternative 3B is referenced within the EAW by MnDOT's Cultural Resources Unit, confirming that it existed and was considered during agency review, while simultaneously being withheld from public disclosure. The omission of this alternative deprived the public of the opportunity to review, comment on, or compare a feasible avoidance option that would have reduced or avoided residential impacts.

MEPA and NEPA require that reasonable alternatives—including those that avoid impacts—be disclosed and evaluated transparently. No meaningful avoidance alternatives were presented to the public despite internal acknowledgment that avoidance was feasible.

Notice to Elected Officials

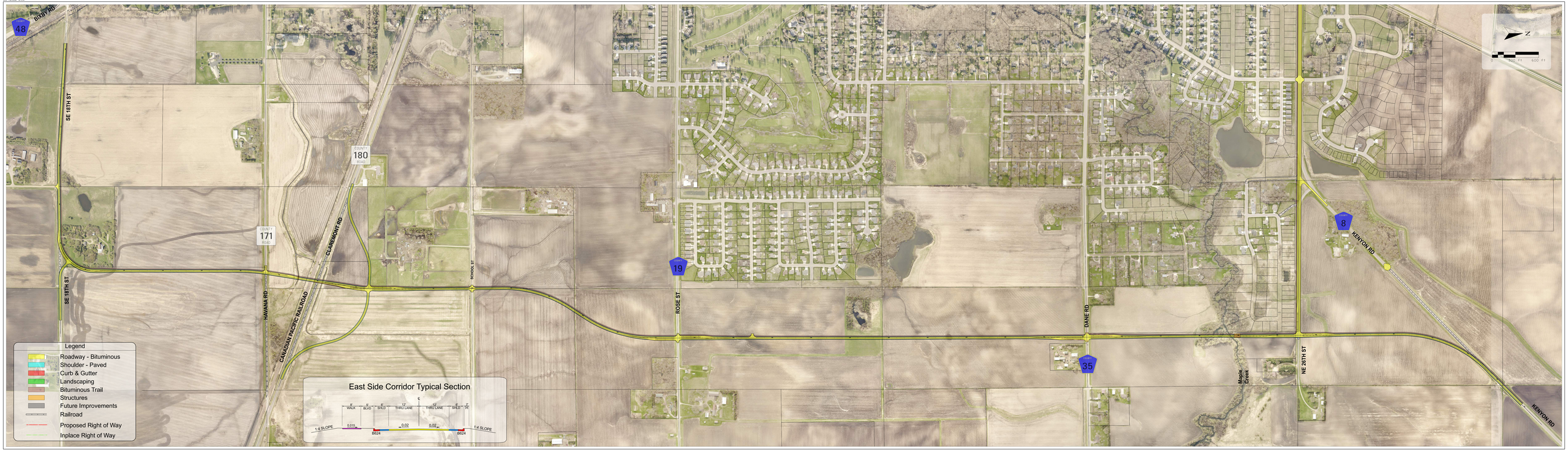
After discovering the attached correspondence, residents—including myself—repeatedly notified elected officials, placing **Steele County and the City of Owatonna on notice** of these deficiencies. Despite this notice, the project continued to advance without correction.

Fatal Flaw – FONSI Precluded; EIS Required

Because impacts were treated as conditional rather than inherent, avoidance was acknowledged but not implemented, alternatives were evaluated using inconsistent assumptions, a reasonable avoidance alternative was withheld from public review, studies showing substantial harms from impacts were unlawfully withheld follow an ALJ order of compliance, and decisions were effectively sequenced prior to full disclosure, the record **cannot support a Finding of No Significant Impact**.

These deficiencies demonstrate a loss of procedural neutrality that cannot be cured by internal revision by the Responsible Governmental Unit. **Independent oversight is required**, and preparation of an **Environmental Impact Statement (EIS)** is necessary to objectively evaluate impacts, avoidance alternatives, and mitigation in compliance with MEPA and NEPA.

Melissa Zimmerman
2525 Stony Creek Dr.
Owatonna, MN
Directly impacted resident

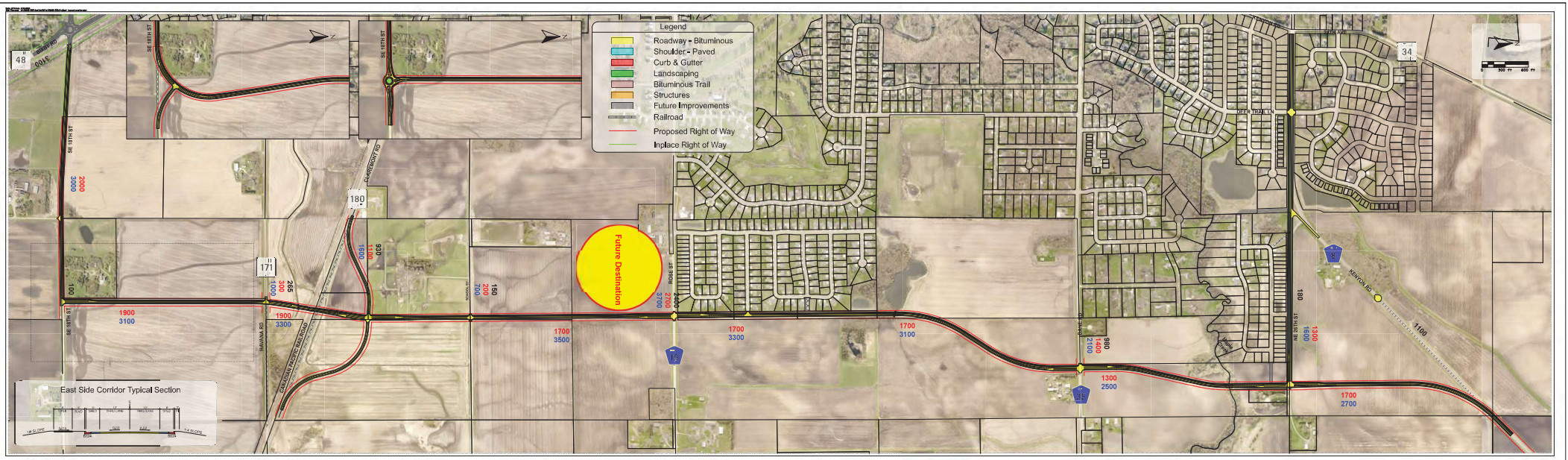


East Side Corridor Study
Steele County, Minnesota

PROJECT LAYOUT - ALTERNATIVE 3B

June 4, 2024

wsb



East Side Corridor Study
Steele County, Minnesota

Existing Daily Volume
Near Term Build Daily Volume
Horizon Year Build Daily Volume

Growth based on network changes and Owatonna Long Range Land Use Plan

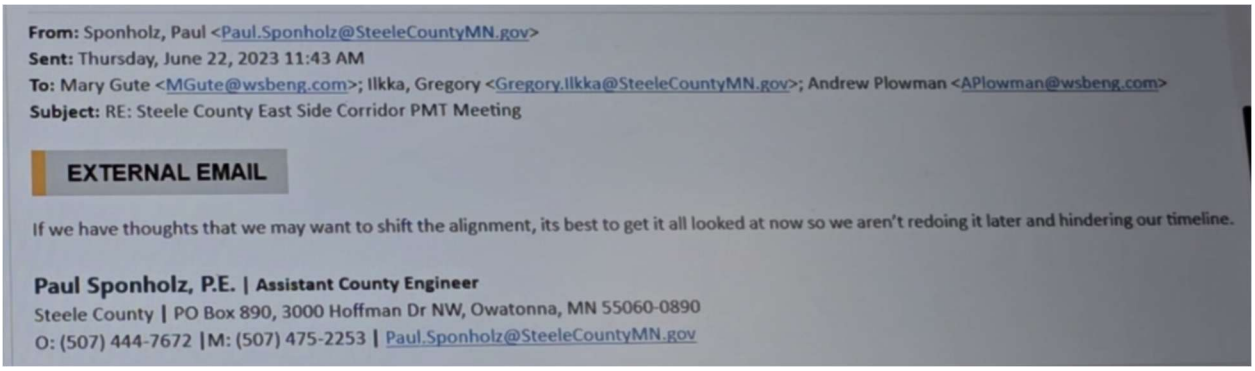
SE 44th Avenue
1100

PROJECT LAYOUT

April 29, 2022

SE 44th Avenue
780

wsb

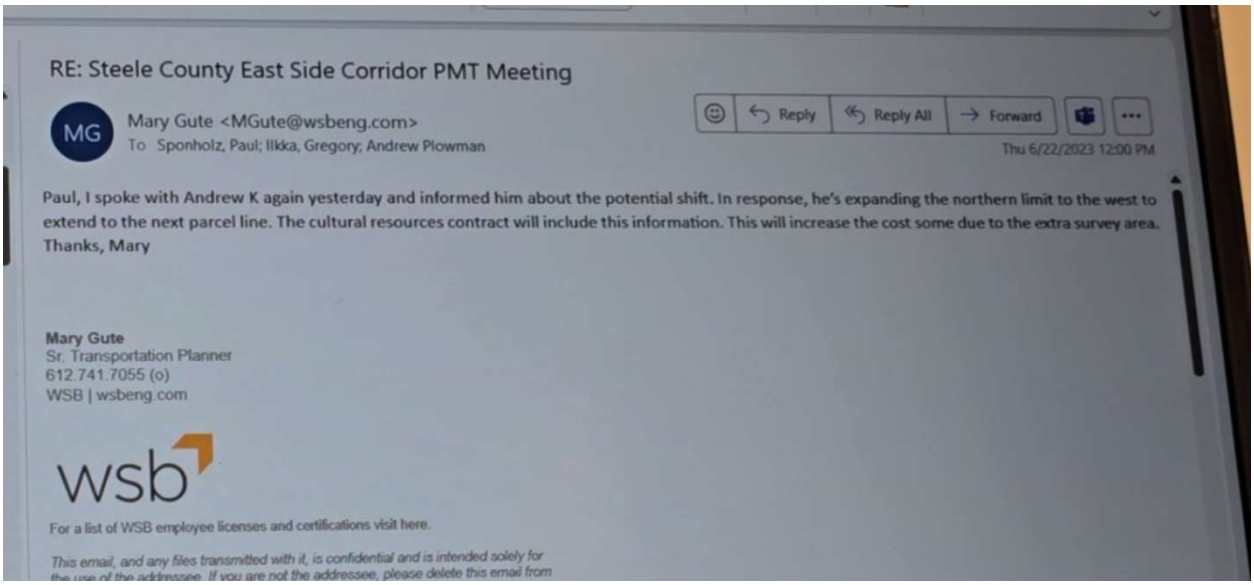


From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, June 22, 2023 11:43 AM
To: Mary Gute <MGute@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Andrew Plowman <APlowman@wsbeng.com>
Subject: RE: Steele County East Side Corridor PMT Meeting

EXTERNAL EMAIL

If we have thoughts that we may want to shift the alignment, its best to get it all looked at now so we aren't redoing it later and hindering our timeline.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



RE: Steele County East Side Corridor PMT Meeting

MG Mary Gute <MGute@wsbeng.com>
To Sponholz, Paul; Ilkka, Gregory; Andrew Plowman

Reply | Reply All | Forward
Thu 6/22/2023 12:00 PM

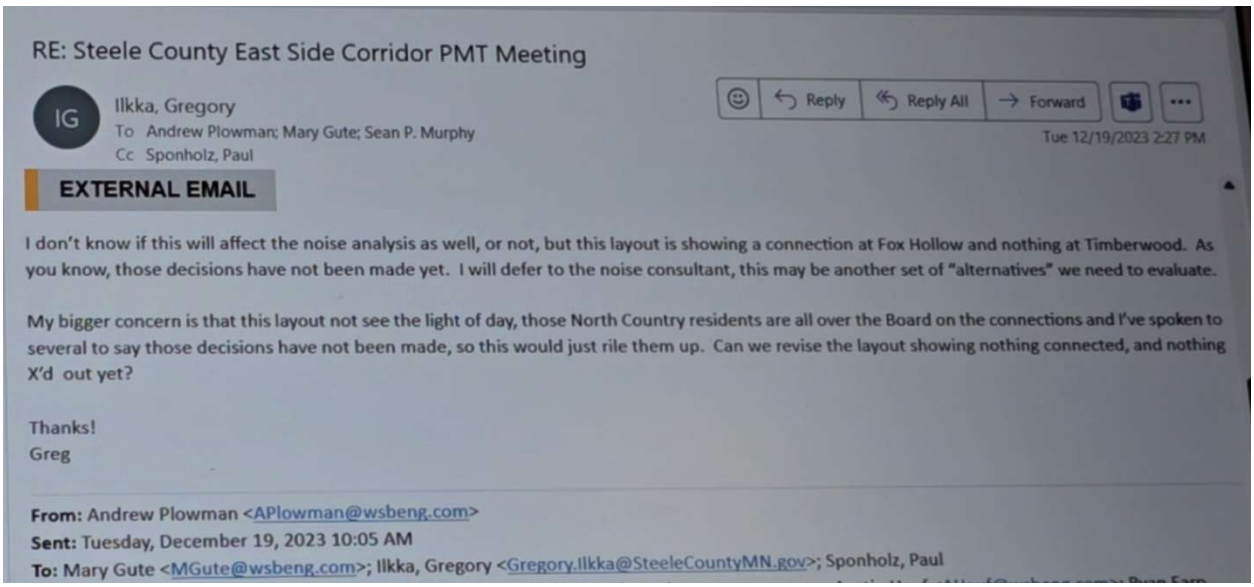
Paul, I spoke with Andrew K again yesterday and informed him about the potential shift. In response, he's expanding the northern limit to the west to extend to the next parcel line. The cultural resources contract will include this information. This will increase the cost some due to the extra survey area.
Thanks, Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

wsb

For a list of WSB employee licenses and certifications visit here.

This email, and any files transmitted with it, is confidential and is intended solely for the use of the addressee. If you are not the addressee, please delete this email from



RE: Steele County East Side Corridor PMT Meeting

IG Ilkka, Gregory
To Andrew Plowman; Mary Gute; Sean P. Murphy
Cc Sponholz, Paul

Reply | Reply All | Forward
Tue 12/19/2023 2:27 PM

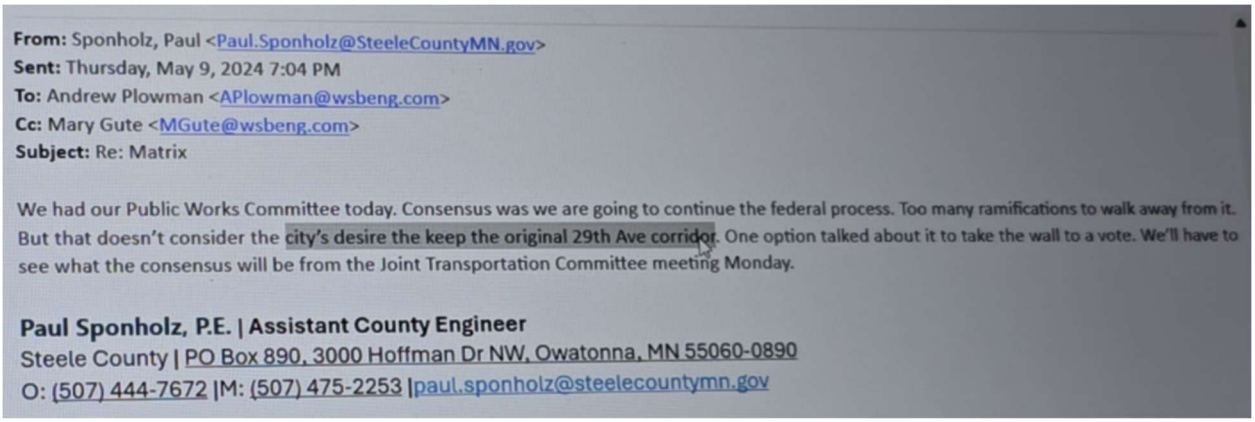
EXTERNAL EMAIL

I don't know if this will affect the noise analysis as well, or not, but this layout is showing a connection at Fox Hollow and nothing at Timberwood. As you know, those decisions have not been made yet. I will defer to the noise consultant, this may be another set of "alternatives" we need to evaluate.

My bigger concern is that this layout not see the light of day, those North Country residents are all over the Board on the connections and I've spoken to several to say those decisions have not been made, so this would just rile them up. Can we revise the layout showing nothing connected, and nothing X'd out yet?

Thanks!
Greg

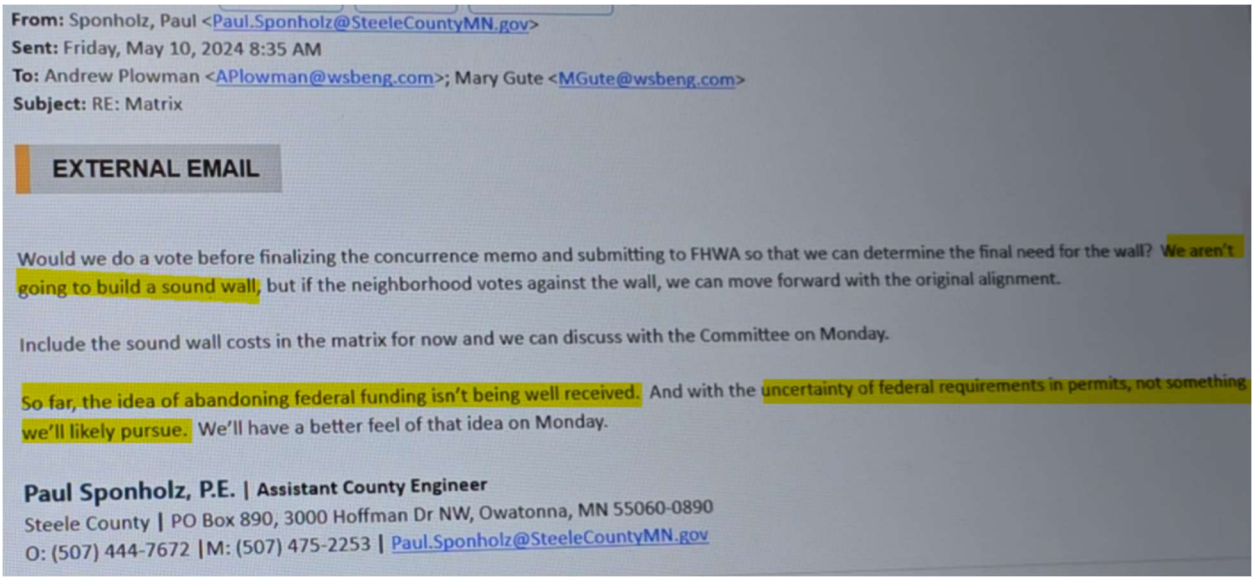
From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Tuesday, December 19, 2023 10:05 AM
To: Mary Gute <MGute@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sponholz, Paul



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, May 9, 2024 7:04 PM
To: Andrew Plowman <APlowman@wsbeng.com>
Cc: Mary Gute <MGute@wsbeng.com>
Subject: Re: Matrix

We had our Public Works Committee today. Consensus was we are going to continue the federal process. Too many ramifications to walk away from it. But that doesn't consider the city's desire the keep the original 29th Ave corridor. One option talked about it to take the wall to a vote. We'll have to see what the consensus will be from the Joint Transportation Committee meeting Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 |paul.sponholz@steelecountymn.gov



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

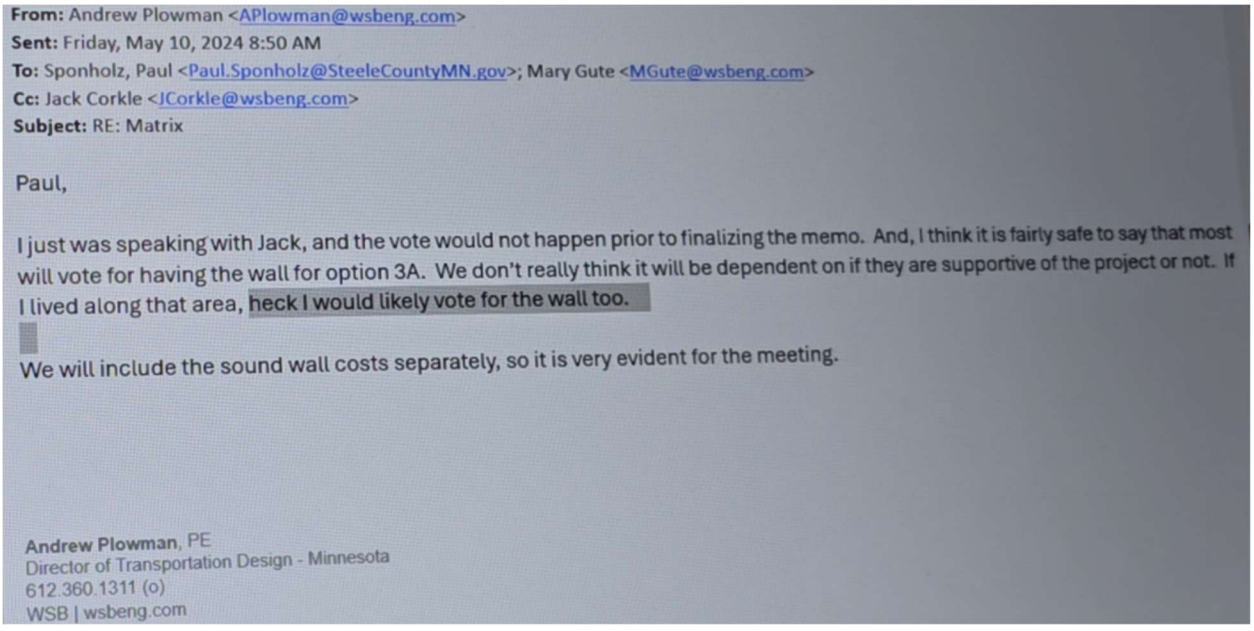
EXTERNAL EMAIL

Would we do a vote before finalizing the concurrence memo and submitting to FHWA so that we can determine the final need for the wall? We aren't going to build a sound wall, but if the neighborhood votes against the wall, we can move forward with the original alignment.

Include the sound wall costs in the matrix for now and we can discuss with the Committee on Monday.

So far, the idea of abandoning federal funding isn't being well received. And with the uncertainty of federal requirements in permits, not something we'll likely pursue. We'll have a better feel of that idea on Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



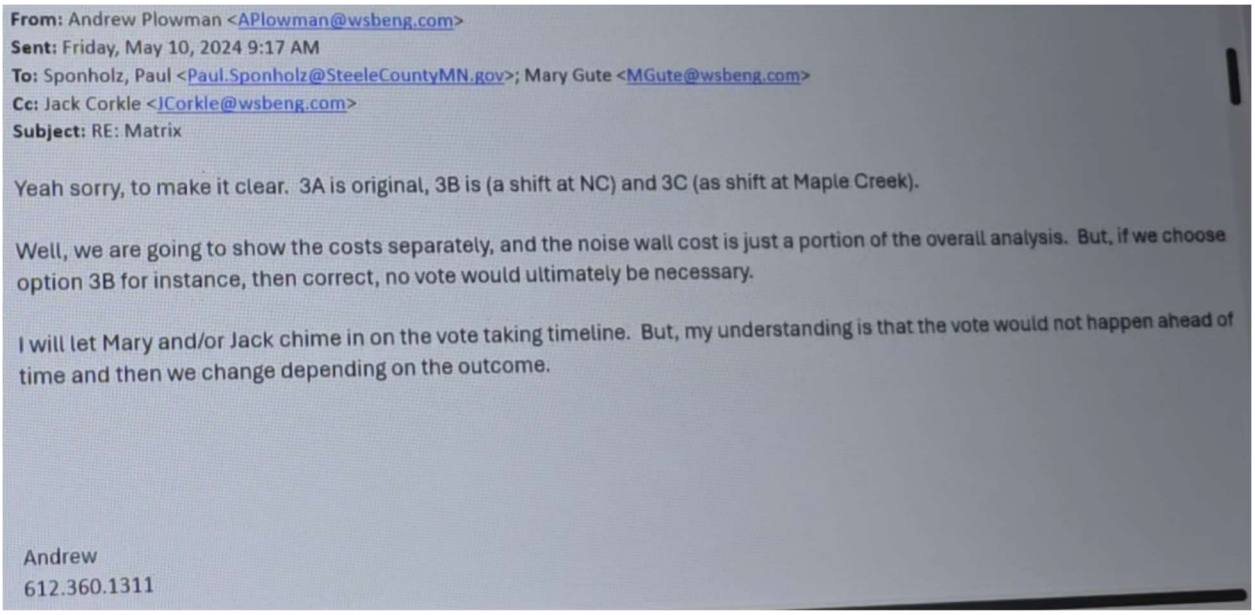
From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 8:50 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Paul,

I just was speaking with Jack, and the vote would not happen prior to finalizing the memo. And, I think it is fairly safe to say that most will vote for having the wall for option 3A. We don't really think it will be dependent on if they are supportive of the project or not. If I lived along that area, heck I would likely vote for the wall too.

We will include the sound wall costs separately, so it is very evident for the meeting.

Andrew Plowman, PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
WSB | wsbeng.com



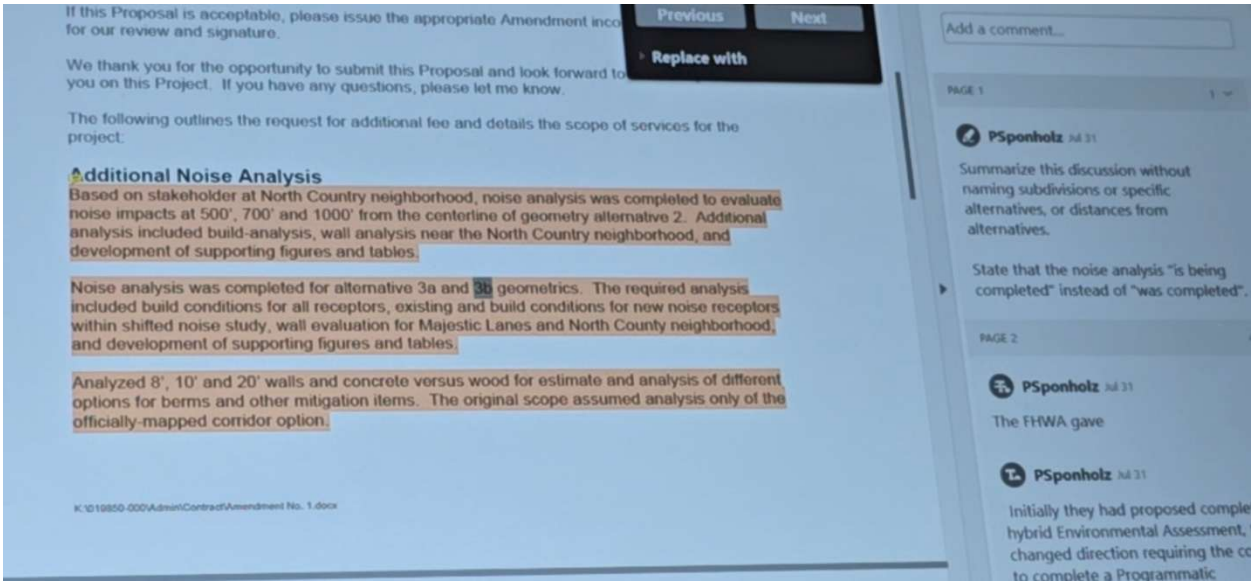
From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 9:17 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Yeah sorry, to make it clear. 3A is original, 3B is (a shift at NC) and 3C (as shift at Maple Creek).

Well, we are going to show the costs separately, and the noise wall cost is just a portion of the overall analysis. But, if we choose option 3B for instance, then correct, no vote would ultimately be necessary.

I will let Mary and/or Jack chime in on the vote taking timeline. But, my understanding is that the vote would not happen ahead of time and then we change depending on the outcome.

Andrew
612.360.1311



If this Proposal is acceptable, please issue the appropriate Amendment inco
for our review and signature.

We thank you for the opportunity to submit this Proposal and look forward to
you on this Project. If you have any questions, please let me know.

The following outlines the request for additional fee and details the scope of services for the project:

Additional Noise Analysis

Based on stakeholder at North Country neighborhood, noise analysis was completed to evaluate noise impacts at 500', 700' and 1000' from the centerline of geometry alternative 2. Additional analysis included build-analysis, wall analysis near the North Country neighborhood, and development of supporting figures and tables.

Noise analysis was completed for alternative 3a and 3b geometrics. The required analysis included build conditions for all receptors, existing and build conditions for new noise receptors within shifted noise study, wall evaluation for Majestic Lanes and North County neighborhood, and development of supporting figures and tables.

Analyzed 8', 10' and 20' walls and concrete versus wood for estimate and analysis of different options for berms and other mitigation items. The original scope assumed analysis only of the officially-mapped corridor option.

K:\2019850-000\Admin\Contract\Amendment No. 1.docx

Previous Next
Replace with

Add a comment...

PAGE 1

PSponholz Jul 31
Summarize this discussion without naming subdivisions or specific alternatives, or distances from alternatives.

State that the noise analysis "is being completed" instead of "was completed".

PAGE 2

PSponholz Jul 31
The FHWA gave

PSponholz Jul 31
Initially they had proposed comple
hybrid Environmental Assessment,
changed direction requiring the co
to complete a Programmatic

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Monday, September 30, 2024 6:32 AM
To: Cabral Neto, Fausto (DOT) [redacted] Bottos, Elisa (DOT) [redacted] Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: Re: Request for Clarification on East Side Corridor Project Updates and Concerns

Looking for any thoughts on how to respond to this email full of inaccuracies and misinformation. [redacted] has twisted things to meet her own agenda here. Shall we set up a teams meeting to discuss a response?I suggest a meeting with MnDOT, city and county engineers and administrators.

The study did look at all alternatives. She unfortunately doesn't like the fact that her preferred alternative didn't get past the purpose and need for the project and that we didn't study it in more detail. There are many reports in the memo outlining how we studied traffic and other information to come to that conclusion.

She's under the impression we were going to have a public meeting to discuss the chosen alternative but we already did, back in May 2023. There will be another public meeting for the final environmental document with a 30 day public comment period. And we've told her that. A meeting now will only confuse the majority of the public. I've gotten many comments of confusion why we even started over (NPCE vs PCE), so don't want to confuse the public even more.

The entire memo is public on our website and available for her to read. We put it out there as quick as possible just for her. And we've told her that. Including the previous 2 memos (purpose and need and evaluation criteria). We'll make other reports(wetlands, archaeological, traffic, noise, etc.) available on the website as we complete them. And I've told her that. I mentioned we have a few other updates to the website, but only just to summarize that 3rd memo. It takes time for our consultant to draft changes and then for the county and city to review before going live. And we are working on a newsletter to update the public. That will come soon. And we've told her that. Melissa needs to be patient.

We are doing a noise wall study. And a noise wall is only one alternative we are looking at. She was at the board meeting when we showed the board several options we are considering. That will come with all the other mitigation things that we must do. We've told Melissa many times that we can't look at mitigation, avoidance until we have the preferred alternative. Now we are starting those processes now that we have the memos completed.

I'm not sure how she has misunderstood that I said a noise wall will not be considered. Certainly I've said it's not in the county's interest due to the cost and if there is a way to avoid a wall we will. But we still need to follow the federal process and it will be considered. And I've told her that.

We aren't ready to discuss publicly, but other options to avoid the wall and address federal noise standards include moving the road 600-800 feet east, assuming it reduces noise impacts. It is feasible from the federal standpoint. How ever it has serious ramifications to the city and township and their development agreements, serious impacts to farmland since we already own 6 acres of land along the subdivision, and it would affect several farmer and their land, serious implications to area farmers and the many other people, who unlike [redacted] have always understood the road was going there and have told us they'd be very unhappy if we move it, serious impacts in how the city would redevelop that land with utilities, etc. All that discussion will like be looked at and included in the final reports.

The mitigation studies she is asking for is going to happen as we study impacts now and come up with avoidance and mitigations as we complete the environmental documentation. She needs patience. Ultimately she will unlikely be unhappy with the final results but we need to think of the county and city as a whole and not just her back yard.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 | M: (507) 475-2253 | paul.sponholz@steelecountymn.gov

Comment #168

ESC EAW Comments #53

Lack of Data Access

This submission documents that no new substantive data was provided during the EAW comment period, that previously reviewed records were lost, altered, or rendered unverifiable while in County custody, and that residents were denied access to the software necessary to inspect data in usable native formats during the comment window. Residents relied on shared access to this data within our community to prepare informed comments.

Only after County offices were closed at the end of the comment period did the County indicate it could provide the software required for meaningful inspection. Prior requests for a pause, extension, or corrective measures were not granted, and attempts to collaboratively identify solutions resulted in escalating communications that further impaired participation.

Furthermore residents formally requested a pause, extension or restart of the comment period following complete production of public data and meaningful inspection. No response has been provided.

As a result, residents were deprived of the ability to submit fully informed and data-supported comments during the EAW process. This comment is submitted to document that meaningful public participation was materially impaired due to loss of records, denial of usable access, and the timing of County actions.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Attachments:
County Attorney Email
Email to Commissioners.

ESC Data Practices Requests / Status

Jarrett, Robert <robert.jarrett@steelecountymn.gov> Wed, Dec 31, 2025 at 4:56 PM
To: Matthew Sennott <matt.sennott@gmail.com>, Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>, Lyssa Lynn <lyssalynn13@gmail.com>, "Housh, Campbell" <Campbell.Housh@steelecountymn.gov>, "Fry, Renae" <Renae.Fry@steelecountymn.gov>

We will not be in trial for several weeks, so that the laptop is available and has Microsoft products on it. We can try it again to see if it alleviates the concerns you have. Another option is to start printing the documents for physical review. What would be your preference?

Robert J. Jarrett

Steele County Attorney

Direct: 507-444-7786

From: Matthew Sennott <matt.sennott@gmail.com>
Sent: Wednesday, December 31, 2025 4:19 PM
To: Jarrett, Robert <robert.jarrett@steelecountymn.gov>
Cc: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>; Lyssa Lynn <lyssalynn13@gmail.com>; Housh, Campbell <Campbell.Housh@steelecountymn.gov>; Fry, Renae <Renae.Fry@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

Mr. Jarrett,

Thank you for your response. I appreciate your acknowledgment of my perspective regarding the timing and impact of the County's changes to data access. I also note your characterization of the Department of Administration proceedings and resulting civil penalty as "very positive." Respectfully, the compliance issues identified there are the same concerns we raised repeatedly for months prior, including through advisory opinions from the Department of Administration, in an effort to resolve these matters without formal enforcement or litigation.

Throughout this process, we have consistently offered to work collaboratively to resolve data access and process issues. Those offers were declined. That history is not a matter of perception; it is reflected in the record and has contributed to an increasingly adversarial dynamic that could have been avoided.

With respect to the remaining unreviewed data, I am willing to return to attempt another inspection. My prior two visits were unsuccessful because the data was not organized or presented in a manner that allowed meaningful review, rendering large portions effectively inaccessible. I will plan to come during the business hours previously identified; please advise if there have been any changes.

I also need to directly address your statement that "the proposed road is no different from other county roads, such as 26th Street or Bixby Road." That comparison is not accurate. Those roads were constructed prior to the surrounding residential development. In contrast, the East Side Corridor proposal involves constructing a new roadway immediately adjacent to long-established homes and neighborhoods. County engineers have previously acknowledged that this configuration is unprecedented in Steele County. That distinction is material from an engineering, land-use, and impact perspective, and it cannot be dismissed as inconsequential.

These differences are among several substantive issues that distinguish the ESC from prior county road projects and are directly relevant to environmental review and public participation.

Sincerely,

Matt Sennott

On Wed, Dec 31, 2025, 2:26 PM Jarrett, Robert <robert.jarrett@steelecountymn.gov> wrote:

> Mr. Sennott-
>
> I understand from your viewpoint that the county's actions are related to your group's actions. I doubt I'll be able to convince you they are not related, but they are not related. The county doesn't care that you filed a data practices complaint, are raising funds to stop the ESC project, or voice your concerns. That's your right. At the same time, the county isn't threatened by district court action – we follow the process for providing data as best we can. Frankly, the data practices complaint was actually very positive and helped the county better understand the impacts of data practices, such the board budgeted an additional attorney to stay on top of the requests (among other duties) to start later next year.

The laptop previously used was for exhibits, and when you first came in, we were not running many trials. So now we are in trial more consistently than before, so we can't use that laptop because our paralegal uses it for MNDES exhibits (all exhibits are now required to be digital).

The county IT department gave us a laptop and set up the basic settings as they do for jail inmates. It has no internet, just basic programs. The county's Microsoft accounts are tied to individual users. The laptop can display emails, PDFs, and documents in their native formats. The drives provided have been updated to be more organized and easier to view – the video sent showed some odd file formats, but the vast majority is presented in a standard view with an email application.

I allowed you to sit at my desk the first day you looked at data, because I knew we'd been trying to connect and get you data, and there had never been a process for a request of this size. I was trying to work with you. Now at this point, I simply don't trust you or Melissa enough to believe you wouldn't try to manipulate the data provided. Therefore, we need to provide a standard for providing the data without sitting next to you as you review it. We have checked with other counties, and they provide view-only data in a similar way. IT is actively looking at other solutions, but this is extra to their regular duties, which they are significantly behind on. For example, I've been waiting 3 months for our computer refresh, over 12 months on IT door locks, emergency button updates – just from IT.

Being direct and giving you my opinion – your data request has zero impact on the ESC road process. If you are looking for a "smoking gun" or something in particular you think we are hiding, it's simply not there from the data I've reviewed. If there is a specific item, it's much easier to find it with search tools. Our county government is a democratic republic, so the 5 commissioners are the decision-makers on whether to build this road. From their comments, I have not heard any commissioner in opposition. Also, no reasonable government official would not want to use already government-owned property to build a road instead of forcing others to sell. The proposed road is no different from other county roads, such as 26th Street or Bixby Road. WSB showed some options for the buffer between your property and the road, much more than 26th Street or Bixby Road. My suggestion would be to focus on securing support for your preferred option.

Lastly, on the data – additional unreviewed data remains accessible and viewable at the county attorney's office during regular business hours. We are closed on New Year's Day.

Have a safe holiday,

Rob

Robert J. Jarrett

Steele County Attorney

Direct: 507-444-7786

From: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Sent: Monday, December 29, 2025 5:21 PM
To: Jarrett, Robert <robert.jarrett@steelecountymn.gov>
Cc: Lyssa Lynn <lyssalynn13@gmail.com>; Housh, Campbell <Campbell.Housh@steelecountymn.gov>; : Matthew Sennott <matt.sennott@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>; Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Subject: Re: ESC Data Practices Requests / Status

Let's be direct.

During my initial inspections, the requested data was readily accessible on the designated laptop, and Microsoft Outlook was used to review the email-based records without issue. Since that time, access and viewability of the same data have materially deteriorated to the point that it is no longer intelligible or usable.

This degradation began only after you became aware that a complaint had been filed with the Department of Administration. Given the timing and nature of the changes, it is difficult to view this as inadvertent.

Please either restore the data to a condition that allows meaningful review, consistent with prior access, or advise whether you intend to resolve this matter through formal proceedings, including district court if necessary.

I look forward to your prompt response.

Matt Sennott

On Mon, Dec 29, 2025, 9:54 AM Jarrett, Robert <robert.jarrett@steelecountymn.gov> wrote:

> Good morning,

Data remains available for review, including PDFs and other documents in their native formats. This is your notice as required under § 13.03, subd. 3 (g).

§13.03, subd. 3 (e) states "The responsible authority of a government entity that maintains public government data in a computer storage medium shall provide to any person making a request under this section a copy of any public data contained in that medium, in electronic form, if the government entity can reasonably make the copy or have a copy made. This does not require a government entity to provide the data in an electronic format or program that is different from the format or program in which the data are maintained by the government entity. The entity may require the requesting person to pay the actual cost of providing the copy."

The county IT department is looking into whether there are other options for you to review the data, but as of today, we have complied with the law by providing the data to you. Any steps IT makes is simply trying to provide better service than is required. Converting the data to pdf or other formats was an idea to aid you.

You have consistently stated you do not want to pay for the data, so we have given you multiple opportunities to clarify and try to provide you with what you are looking for, but you have not narrowed the scope. You can't have it both ways, wanting a broad request and not paying for the data, and at the same time broadly reviewing hundreds of hours of data – we don't have the time to sit with you to review it and so have provided the computer with free programs to view it. Your broad statements about a lack of government data accessibility are incorrect. Steele County day in and day out consistently provides data as requested to many requestors in a simple and straightforward process. Your request is extremely broad and large. Government data is and can be made available, but it is not accessible to review everything for no cost. This position is quite clear in statute.

Have a safe day.

Robert J. Jarrett
Steele County Attorney
303 S. Cedar Avenue
Owatonna, MN 55060
Tel: 507-444-7780

This email is intended to be read only by the intended recipient. This email may be legally privileged or protected from disclosure by law. If you are not the intended recipient, any dissemination of this email or any attachments is strictly prohibited, and you should refrain from reading this email or examining any attachments. If you received this email in error, please notify the sender immediately and delete the email and any attachments.

From: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Sent: Monday, December 22, 2025 5:28 PM
To: Jarrett, Robert <robert.jarrett@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

Good afternoon Rob,

Thank you for the update and for outlining the County's current position regarding the data production.

To be clear at the outset, we are not disputing that files exist or that data has been made available in some form. The issue is that the manner in which much of this data has been produced renders it effectively unusable and fails to provide meaningful access as required under Minnesota Statutes § 13.03.

1. TXT conversions do not constitute meaningful access
The TXT files provided—particularly on Drive #4—are not usable records. They open with one or two characters per line, lack metadata, strip attachments and images, and break email threading entirely (see attached video). Emails converted to TXT format cannot be linked, searched in context, or reviewed as records. This is not a functional substitute for native email formats and does not allow a requester to understand or evaluate the record as it existed.

2. Native formats are required and expected
We expect records to be provided in native formats, consistent with Minn. Stat. § 13.03, subd. 3(e). This requirement is not satisfied by converting records into formats that eliminate content, structure, or usability.

3. Software access is not the requester's burden
You indicate that the County is willing to provide data in native formats but cannot provide a licensed computer for review, leaving "free software" as the only option. What this effectively means is that the County is willing to provide native records but not the means to reasonably access them.

If the County is willing to accept the asserted security risks of free software, it should be noted that Outlook itself has a free version capable of opening PST files and linking .msg files. Alternatively, the County can provide records for download at no cost so requesters may use their own licensed software. That said, neither approach resolves the broader access problem. The free software options identified are insufficient: CoolUtils does not allow more than one email to be

opened at a time, does not preserve email chains, and does not permit efficient review of thousands of records; the software to open word files changes the fonts and layouts.

4. Organization, verification, and harm to residents
While you note that a requester "cannot manipulate data into folders," there is no statute prohibiting this, nor is there a prohibition on the County organizing records in a manner that allows meaningful review. Given the volume of records and the county's position, we are requesting that records be organized in folders by type at a minimum.

More critically, there is currently no way for residents to verify the completeness of Drive 1— records were removed, deleted, or otherwise rendered unavailable while in the County's possession. The original review alone required approximately 20 hours. This lack of verifiability directly harmed residents by preventing timely and informed public comment during the EAW process. The opportunity to meaningfully comment using this data has already been lost and cannot be retroactively cured without an extension, regardless of a subsequent data dump.

This constitutes a direct violation of MEPA and NEPA, both of which require early and meaningful public participation. Residents were also instructed to create folder structures themselves to make copying more efficient, further shifting the burden of access onto the public.

5. Requests to narrow the scope
We did not ask the County to re-produce selected records on our behalf. We sought to review the data already made public and print what was necessary within the available timeframe. Reliance on County-mediated searches removed our ability to independently evaluate the record and required additional time in an already time-constrained process—time we did not have.

We requested a pause of the EAW due to lack of access. That request was denied by non-response. We requested an extension. That request was also denied by non-response. These were County-imposed limitations, not requester delays.

6. Practical impossibility of review and irreparable harm under current conditions
As of December 15, 2025, four flash drives and a CD are technically available; however:

- **Drive 1:** Data cannot be verified within the available time frame.
- **Drive 2:** Only one email can be opened at a time using the provided tools.
- **Drive 3:** PST files do not open in CoolUtils.
- **Drive 4:** TXT files are unusable.
- **CD:** PDF equivalents of Word documents were not visible, and free software altered fonts and layouts in the .docx files.

These technical limitations exist against the backdrop of a more serious problem: while the data was in the County's possession, a substantial volume of records—approximately 1,800 files—were removed or otherwise rendered unavailable, and there is no reliable method to confirm whether all records have since been restored or whether additional changes occurred. Residents were relying on this data to prepare EAW comments.

During the initial review, when no EAW deadline was pending, it took approximately four hours to load the records into Outlook so that email chains could be followed and approximately 20 hours to conduct a substantive review. That work was undertaken with the understanding that residents would be able to return and print or further review records as needed once the EAW comment period opened.

That is no longer possible. The EAW comment period is now active, residents are required to simultaneously prepare and submit technical comments, County office hours are substantially reduced due to holidays, and residents' availability is constrained by travel and family obligations. Under these conditions, it is not feasible to repeat a 20-hour reconstruction and review process. There is also no mechanism to confirm that Drive 2 or other data sets were not similarly compromised.

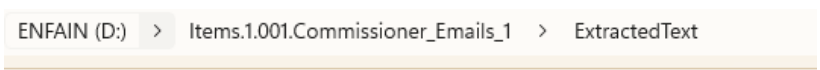
The loss of data integrity and verifiability during an open EAW comment period has directly deprived residents of the ability to rely on the record they previously reviewed and to meaningfully incorporate that information into timely environmental comments. The resulting loss of meaningful access at this stage of the EAW process has caused irreparable harm. This harm cannot be cured through belated production or continued on-site inspection under the current constraints.

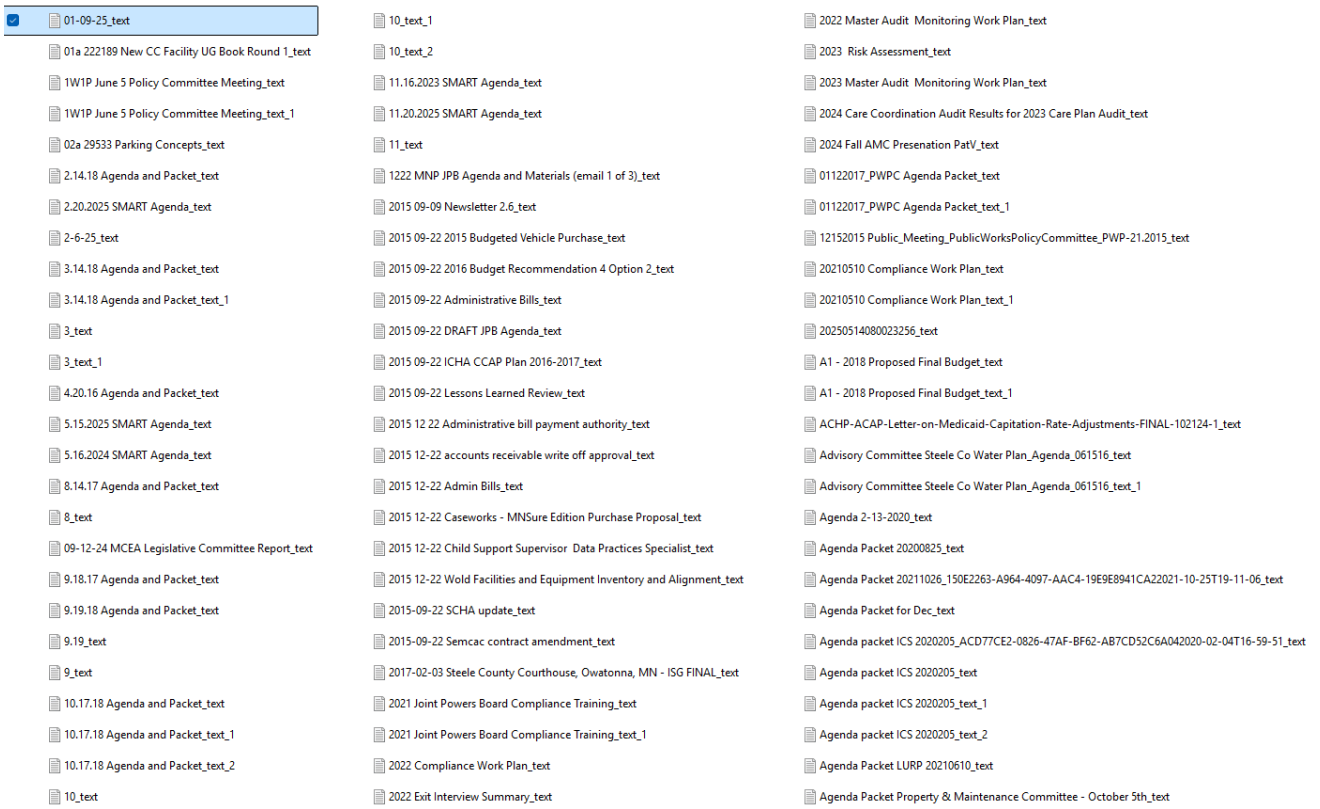
Conclusion and requested remedy
Direct harm has already occurred. Residents were deprived of meaningful access to public data and, as a result, deprived of the ability to participate fully in the EAW process. The only reasonable remedy at this point is to extend the EAW public comment period until residents have had sufficient time to access, review, and verify all requested data in usable, native formats.

We remain willing to work in good faith toward a resolution, but meaningful access—not mere availability—is required by law.

Sincerely,
East Side Corridor Residents

On Mon, Dec 15, 2025 at 4:53 PM Jarrett, Robert <robert.jarrett@steelecountymn.gov> wrote:

> Good afternoon,
>
> SCAO staff and I were able to view the items on the jump drives. Here is a clip from drive #4 from "commissioner emails". I removed the multiple folders and left only those that contained items.
>
> 
>
>
> Here is a clip of some of the items:



That folder alone contained 1,542 items. All text formats that were reviewable. Another option is to provide in a native format (like drives 1-3); however, the county does not have a non-licensed computer to give you to review all this data, so the option of free software is the only available option. The county is open to other ideas if you have them; however, we do not have time to sit with you to review this large amount of data.

The data drive 1 was redownloaded to ensure it was complete. A requester cannot manipulate data into folders; they can only review data.

Again, if there are specific items you are looking for the county can do a search more quickly than the broad request that we are currently working under. Please review the prior excel document I sent that had all the files listed.

As of today, December 15, 2025, there are 4 flash drives of data available for review during business hours.

Topic	**Sub request**	**Status**
All ESC Data	Large request – remains in progress overall, broken into smaller parts, and provided in waves.	*In progress* Estimated completion Feb 22, 2026.
	Emails – Paul & Greg to/from WSB	Completed & available **(Drives 1, 2, 3)**
	Emails - county commissioners	*In progress* Estimated date: January 2, 2027 *1000+ items ready for review* ***(Drive 4)***

Have a safe night,

Rob

Robert J. Jarrett

Steele County Attorney

Direct: 507-444-7786

From: Lyssa Lynn <lyssalynn13@gmail.com>
Sent: Tuesday, December 9, 2025 11:21 PM
To: Housh, Campbell <Campbell.Housh@steelecountymn.gov>; Jarrett, Robert <robert.jarrett@steelecountymn.gov>
Cc: Matthew Sennott <matt.sennott@gmail.com>; Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>; Abbe, Jim <Jim.Abbe@steelecountymn.gov>; Brady, James <James.Brady@steelecountymn.gov>; Glynn, John <john.glynn@steelecountymn.gov>; Krueger, Greg <Greg.Krueger@steelecountymn.gov>; Prokopec, Joshua <joshua.prokopec@steelecountymn.gov>
Subject: Re: ESC Data Practices Requests / Status

Dear Rob and Campbell,

I was able to inspect the County's public data on **December 9, 2025**, arriving at approximately **4:00 p.m.** I had several specific tasks I intended to accomplish during this inspection:

- Inspect traffic studies that were previously inaccessible
- Inspect the most recent dataset made available
- Inspect the dataset that Matt Sennott was previously unable to review
- Locate several specific emails from the original datasets

I was **unable to accomplish any of these tasks**.

I am therefore providing formal notice regarding the County's **continued failure to provide meaningful access** to public data requested in connection with the East Side Corridor project, as required under **Minn. Stat. §13.03**.

Despite repeated attempts to inspect the data on **July 21, August 28, October 28, and December 9,** and repeated notice to the County, the data and inspection environment provided have not allowed meaningful access or review.

Ongoing and Uncorrected Access Failures (Timeline)

Meaningful access to the requested public data has **not been available since March 11, 2025**. Any access attempts after that date have been thoroughly documented as inaccessible, unstable, or unusable.

These failures did not occur in isolation. The current conditions compound previously documented data access issues identified on **January 15 and February 4, 2025**, which were formally raised with the County and **never corrected**.

Despite repeated notice over multiple months, the County has not restored stable, complete, and reasonably usable access to the public data. Instead, access has progressively degraded over time, culminating in the inspection failures documented below.

Dataset 1 and Dataset 2 – Email Records (Materially Incomplete)

The jump drive labeled **Dataset #1**, which previously contained **over 1,800 email records**, contained only **18 accessible emails** at the time of inspection. As a result, I was unable to locate specific emails that I had previously reviewed and relied upon. This raises concerns regarding the integrity and completeness of **Dataset #2** as well.

During earlier inspections, I spent **many hours loading thousands of emails into Outlook** to make the data in these datasets reasonably usable. Outlook is no longer available on the inspection system, and the email data previously accessed is no longer present or accessible in that form.

Additionally, the email files are **randomly named and not organized chronologically or logically**, making it impossible to locate known records. Outlook was necessary to render the data usable. Because of these defects, I was unable to locate specific records that are vital to preparing my Environmental Assessment Worksheet (EAW) comments.

Loss of Data Integrity and Irreparable Prejudice

Even if the County were able to recover or re-produce the missing email data at some point, the repeated access failures have created a **loss of continuity and verifiability**. There is no way to confirm that any subsequently provided data would be identical to the datasets previously available or that it would include all records originally responsive to the request.

In addition, restoring access at this stage would require re-reviewing and re-organizing a substantial volume of data that was originally requested more than **14 months ago**. Residents previously spent **approximately 15–18 hours** reviewing and organizing these records in order to make them usable.

Requiring this work to be repeated due to the County's access failures imposes an **unreasonable burden** and further prejudices meaningful participation. Delayed or reconstructed access does not cure the denial of access that has already occurred.

Dataset 4 – Degraded and Unusable Email Content

The most recent dataset appears to consist of emails converted to **.txt files**. These files are severely degraded, including instances where text appears **one character per line**. Attachments, metadata, threading, original formatting, and contextual structure have been removed.

As presented, these files are **functionally unusable** and do not allow meaningful inspection. Public data must be provided in the manner in which it is generally stored and maintained. Email records are not stored as .txt files, and conversion to this format strips essential context, attachments, and usability.

PST / Native Email Files

PST and native email files are present in dataset #3, including a PST associated with **Paul Sponholz** exceeding **3 GB**, which Matt Sennott documented as usable on **July 21, 2025**. When opened during this inspection, the file displayed a blank screen with no email content. Other PST or native files similarly failed to open or display records in a meaningful way.

Third-Party Viewing Software

The County replaced standard email software with third-party viewers, including **CoolUtils Outlook Viewer and other third party viewers**. As configured, this software does not present email records in a commonly understood or intuitive format. Navigation is not common-sense, layout is non-standard, and email content appears fragmented and distorted.

The software does not allow for loading and retaining multiple email files; previously viewed content disappears upon closing, making review tedious and impracticable. Emails cannot be reviewed as a complete dataset or viewed chronologically.

Files are assigned **random filenames** with no logical order, date, sender, or subject identifiers. This prevents sorting, searching, timeline reconstruction, identification of related correspondence, or location of known records.

The use of this software, as well as other viewers such as the Word document viewer, alters how records appear — including fonts, spacing, and layout — and does not display records as they are ordinarily maintained or reviewed. In practice, the records appear **garbled rather than intelligible public data**.

Physical Media and System Failures

The County provided **four USB drives and one CD** for inspection. I was unable to access any data on the USB drives. The PDF files on the CD could be opened, but access was extremely slow. Word documents that were previously available are now missing.

I was informed that certain Word documents were converted to PDFs and that both formats were available; however, I did not observe corresponding Word and PDF versions of these files.

The County previously testified under oath that it purchased a **new computer system dedicated to public data inspection**. The system provided is outdated and unstable. Upon startup, it entered an **automatic repair process**, demonstrating that it is not suitable for public data inspection.

Security, Integrity, and Availability of Standard Government Tools

The access failures described above are not justified by security, technical, or licensing constraints.

The County has previously testified under oath that it operates within a **Microsoft enterprise environment with full Microsoft licensing**. As such, the County already possesses secure, compliant tools capable of displaying email and document records **as maintained**, including licensed Microsoft Office applications designed for enterprise and government use.

Standard configurations exist that allow records to be viewed in a **read-only, offline environment**, preserving data security and integrity while allowing meaningful inspection. These configurations do not require user accounts, internet connectivity, or modification of underlying data.

Instead, the inspection environment relied on **non-standard third-party viewing applications** that fragment datasets, alter formatting and layout, and prevent coherent review. Beyond impairing access, this approach introduces **system governance and security risk**. Inspection systems can be reconnected to a network with minimal action, and third-party software that does not operate within a managed enterprise update and security framework increases exposure to vulnerabilities and outdated components.

This approach introduces security risk and departs from standard government IT practices designed to minimize risk and preserve data integrity.

The inspection environment provided is therefore **neither secure nor functional** for purposes of public data inspection.

Avoiding licensed, enterprise-managed software in favor of non-standard viewers is not a reasonable tradeoff where it introduces additional security and governance risk.

Impact on Legal Participation

As a result of these **ongoing, uncorrected access failures**, the data is incomplete, inaccessible, and degraded to the point of being unusable. These conditions have directly interfered with my ability, and my community's ability, to review public records necessary for **meaningful participation in the ongoing Environmental Assessment Worksheet (EAW) process**.

At this point, the condition of the data and the inspection environment constitutes **denial of access to public data** under Minn. Stat. §13.03.

For clarity, I hold a **degree in computer science** and am experienced in reviewing large electronic datasets. Despite that expertise, I was unable to access or meaningfully review the data as provided.

I documented these conditions with photographs and video at the time of inspection.

ction.

Governance and Compliance Notice

The Office of Administrative Hearings has made clear that **meaningful access to public data is a prerequisite to lawful public participation**, and that public entities have an affirmative obligation to ensure that such access is provided. In this case, the continued denial of usable access — including missing datasets, degraded records, and data previously available and now inaccessible — is occurring during the **active EAW comment period**, when public review is required to be informed and substantive.

Under **MEPA and NEPA**, public participation is intended to occur **early and often**, with access to the underlying data necessary to evaluate purpose, need, impacts, and alternatives. Here, ESC-related public data essential to that review was not made meaningfully accessible **prior to the release of the EAW**, and remains inaccessible now.

Proceeding with the EAW while required data remains unavailable undermines the **procedural integrity** of the environmental review and deprives the public of the opportunity for **meaningful participation** contemplated by state and federal law.

In light of these unresolved access failures and the requirements of MEPA and NEPA for informed public participation, proceeding with the EAW while essential public data remains unavailable raises serious procedural concerns. The appropriate corrective action under these circumstances is to **pause the EAW process until meaningful access to the required data has been restored**, so that public participation can occur as required by law.

Because these matters involve required compliance with an OAH order (**CAH 22-0305-40882**), East Side Corridor–related public data, and the integrity of EAW procedures, I have copied the County Board for awareness and oversight.

Requested Action

Please advise, in writing, how and when the County will provide access to the **complete, intact, and reasonably usable dataset** in a stable and functional inspection environment, as required by Minn. Stat. §13.03.

Sincerely,
Melissa Zimmerman
Owatonna East Side Corridor Residents

On Tue, Dec 9, 2025 at 12:47 PM Lyssa Lynn <lyssalynn13@gmail.com> wrote:

> I will do my best to make it there around 3. After you said the office wasn't open, I reached out to the city to schedule inspection and will be there until 3.
>
> On Tue, Dec 9, 2025 at 6:05 AM Housh, Campbell <Campbell.Housh@steelecountymn.gov> wrote:
>
> > Hello,
> >
> > We have an all staff event that will occupy a lot of our space for much of the afternoon, but we can make the small conference room available for data viewing at 3:00 p.m.
> >
> > Sincerely,
> >
> > Campbell Housh
> > Chief Deputy County Attorney
> > Steele County Attorney's Office
> > 303 S. Cedar Avenue
> > Owatonna, MN 55060
> > Office Line: 507-444-7778
> >
> > *This email is intended to be read only by the intended recipient. This email may be legally privileged or protected from disclosure by law. If you are not the intended recipient, any dissemination of this email or any attachments is strictly prohibited, and you should refrain from reading this email or examining any attachments. If you received this email in error, please notify the sender immediately and delete the email and any attachments*
> >
> > ---
> >
> > **From:** Lyssa Lynn <lyssalynn13@gmail.com>
> > **Sent:** Monday, December 8, 2025 8:26 PM
> > **To:** Housh, Campbell <Campbell.Housh@steelecountymn.gov>; Matthew Sennott <matt.sennott@gmail.com>; Jarrett, Robert <Robert.Jarrett@steelecountymn.gov>; Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>
> > **Subject:** Re: ESC Data Practices Requests / Status
> >
> > You don't often get email from lyssalynn13@gmail.com. Learn why this is important
> >
> > I was planning to inspect data in the afternoon as I have appointments in the morning. Is the County Attorney's office closed tomorrow afternoon? If so, I am not available again until Monday the 15th.
> >
> > Thanks,
> > Melissa

On Mon, Dec 8, 2025 at 6:42 PM Housh, Campbell <Campbell.Housh@steelecountymn.gov> wrote:

> Hi there,
>
> I thought I would respond and introduce myself to give a bit of an update on your question below.
>
> I would be happy to meet. As far as scope, I see the general purpose being to provide a point of contact between our office and yourself / Mr. Sennott to talk about any issues you want to bring up. There is absolutely no obligation of any kind or rush to meet – just an open offer. As far as scheduling, if there is interest I would be happy to find a time where we could all meet.
>
> I know you had mentioned wanting "to ensure any discussion is productive and aligned with the remaining issues, including data accessibility and the expected timeline for completion of our outstanding requests." Given that the email exchanges that have taken place between then are directly addressing those issues, I was waiting to chime in regarding the scope of the meeting. I certainly would be open to meeting before the holidays, but given the estimated completion date and ongoing exchanges maybe it would be more fruitful to find a time after the holidays.
>
> Also, I wanted to make sure to let you know that if you decide to come in to view data tomorrow, the office would be open for that purpose between 8:15 a.m. and 12:00 p.m,- in case it makes planning your day out more convenient. I hope everyone has a restful evening!
>
> Best,
>
> Campbell Housh
> Chief Deputy County Attorney
> Steele County Attorney's Office
> 303 S. Cedar Avenue
> Owatonna, MN 55060
> Office Line: 507-444-7778
>
> *This email is intended to be read only by the intended recipient. This email may be legally privileged or protected from disclosure by law. If you are not the intended recipient, any dissemination of this email or any attachments is strictly prohibited, and you should refrain from reading this email or examining any attachments. If you received this email in error, please notify the sender immediately and delete the email and any attachments*
>
> ---
>
> **From:** Lyssa Lynn <lyssalynn13@gmail.com>
> **Sent:** Monday, December 8, 2025 5:22 PM
> **To:** Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
> **Cc:** Jarrett, Robert <Robert.Jarrett@steelecountymn.gov>; Matthew Sennott <matt.sennott@gmail.com>; Fry, Renae <Renae.Fry@steelecountymn.gov>; Housh, Campbell <Campbell.Housh@steelecountymn.gov>
> **Subject:** Re: ESC Data Practices Requests / Status
>
> You don't often get email from lyssalynn13@gmail.com. Learn why this is important
>
> Hello Mr. Jarrett,
>
> I should be available tomorrow to come in and inspect data.
>
> In an earlier email, you mentioned the possibility of a meeting with another attorney, but did not indicate the purpose or any proposed time. Could you please provide an update on whether that meeting is still being considered, and if so, what the intended purpose would be so I can plan and coordinate accordingly?
>
> Thank you,
>
> Melissa Zimmerman

On Mon, Dec 8, 2025 at 4:49 PM Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com> wrote:

> County Attorney Jarrett,
>
> Thank you for your response. We need clarification on several points where the County's "no data exists" determinations conflict with data that clearly does exist and with the requirements of Minn. Stat. §§ 13.03, 13.05, and 15.17.
>
> ---
>
> **1. Joint Transportation Committee (JTC)**
>
> Steele County's own 2025 Committee Appointments document lists the **Intergovernmental Joint Transportation Committee** under "Joint Powers, Advisory Board, Regional Representation." This is responsive data showing the Committee's official status.
>
> Additionally, **commissioner per diem/attendance records for JTC meetings exist** and were not produced. These records alone demonstrate that the County *has* maintained JTC-related data.
>
> For clarity:
> Our JTC request was **not limited to minutes**. It includes all data the County "created, received, maintained, or disseminated" regarding the JTC, including emails, correspondence, materials provided to commissioners, formation/purpose records, and any ESC-related documents.
>
> Given that responsive records **do** exist, please explain:
>
> 1. Why they were not identified or produced;
> 2. Whether the County intends to correct its "no data" response; and
> 3. If you maintain that another entity holds additional JTC records, **which entity** and whether Steele County has requested copies pursuant to §13.05, subd. 11.
>
> ---
>
> **2. Noise Studies / Noise Modeling**
>
> Your response states that no noise studies were "conducted or received."
> However:
>
> - **WSB transmitted ESC noise modeling to the State**, and
> - **County commissioners received portions of this modeling within the last few weeks.**
>
> This contradicts the County's assertion that no such data exists or was received. Under Minn. Stat. §13.05, consultant-produced modeling is government data, and the County is required to request and provide it.
>
> Please clarify:
>
> 1. Whether the County now acknowledges the existence of ESC noise modeling;
> 2. Whether the County has requested the full modeling data from WSB; and
> 3. Why this data was not identified or produced in response to our request.
>
> ---
>
> **3. Required Documentation for "No Data" Determinations**
>
> For each item where the County continues to assert that no responsive data exists, please provide:
>
> - The systems, databases, and locations searched;
> - Date ranges;
> - Staff who performed each search;
> - Whether archived, OneDrive, email, or consultant-held data was included; and
> - Any documentation reflecting search steps (search terms, internal notes, communications).
>
> If no documentation exists for any of these searches, please confirm that in writing.
>
> ---
>
> We appreciate the ongoing work involved in processing these requests. At this point we are simply seeking to reconcile the County's statements with the existence of responsive data and with statutory requirements.
>
> We look forward to your clarification so that these requests can be considered fully responded to.
>
> Respectfully,
> **Melissa Zimmerman & Matt Sennott**
> Owatonna East Side Corridor Residents

On Mon, Dec 8, 2025 at 4:07 PM Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> wrote:

> Dear Ms. Zimmerman and Mr. Sennott,
>
> Thank you for your continued engagement regarding the East Side Corridor (ESC) data practices requests.
>
> **Re: Joint Transportation Committee**
>
> You are misinterpreting Minn. Stat. § 471.59. This statute does not require the county to enter into a joint exercise of powers; it allows the county to enter into agreements but does not require it to do so. Additionally, to my understanding, this committee exercises no authority or government powers. This committee has no formal agreement. It is no different than any other ad hoc committee. Therefore, the committee is not required and does not have minutes. While the Joint Transportation Committee is listed as a Joint Powers entity, Steele County is not

the responsible authority for maintaining its records. We have confirmed that no records were created or received by the County in connection with this Committee. If records exist, they may be maintained by another participating entity. The County has not destroyed any such records, nor were any withheld.

Re: Noise Studies

Former county engineer Paul Sponholtz told us there were no formal noise studies. Regarding Ms. Fry's Testimony: Ms. Fry's statement during the ALJ proceeding accurately reflects the scope of the County's search. To the county's knowledge, Mr. Sponholz conducted a targeted search of the relevant drive where ESC-related project files are maintained. The county's position remains that no noise studies were conducted or received.

Re :Commissioner Emails

Microsoft Purview now has an analytics tool that produced the attached summary for the "Commissioner ESC" data request. It includes a search of OneDrive as well as emails. As you can see, there are 5829 items, an unknown number of page(s) for each. I provided the columns FileClass, SubjectTitle, and Location. If you'd like to speed up the document request, I can certainly go through a specific item if you highlight them from this list. Otherwise, it is thousands of pages that likely contain irrelevant information but do fit your data request. **There are 336 items ready for review.** The estimated competition date is updated to January 2, 2026.

This and previously requested and responsive data remain available for viewing in accordance with Minn. Stat. § 13.03.

Robert J. Jarrett

Data Practices Responsible Authority Steele County

Steele County Attorney

Direct: 507-444-7786

From: Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com>
Sent: Friday, December 5, 2025 10:16 PM
To: Jarrett, Robert <Robert.Jarrett@steelecountymn.gov>; Matthew Sennott <matt.sennott@gmail.com>; Lyssa Lynn <lyssalynn13@gmail.com>
Cc: Fry, Renae <renae.fry@steelecountymn.gov>; Housh, Campbell <

Request to Extend or Restart EAW Comment Period Due to Denied Access to Public Data

1 message

Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com> Sun, Dec 28, 2025 at 8:51 PM

To: "Abbe, Jim" <Jim.Abbe@steelecountymn.gov>, "Prokopec, Joshua" <joshua.prokopec@steelecountymn.gov>, "Brady, James" <James.Brady@steelecountymn.gov>, "Krueger, Greg" <Greg.Krueger@steelecountymn.gov>, "Glynn, John" <john.glynn@steelecountymn.gov>

December 28, 2025
Steele County Board of Commissioners
630 Florence Ave, Owatonna, MN 55060

Dear Commissioners,

We are writing to formally request that the Environmental Assessment Worksheet (EAW) comment period for the East Side Corridor project be extended or restarted until all outstanding public data requests have been fully complied with and affected residents have had a meaningful opportunity to inspect, review, and understand the data necessary to participate in the environmental review process. This request has been raised on multiple prior occasions, including during public comment on November 25, 2025, in written correspondence to the Commissioners on December 9, 2025, and again during public comment on December 16, 2025. The EAW comment period opened on November 18, 2025, while an active public data practices case involving Steele County was pending, and on November 24, 2025, an Administrative Law Judge ruled that Steele County violated the Minnesota Government Data Practices Act multiple times, ordering compliance and imposing the maximum penalties authorized..

Despite this ruling, meaningful access to public data has not improved and has instead deteriorated. Records previously available for inspection have been removed, newly produced data has been converted into unusable formats, software required to review the data has been removed, and files have gone missing. Data requests specifically identified by the Judge as improperly responded to continue to be denied despite documented proof of the data's existence. When Ms. ZImmerman arrived to inspect newly produced data on December 9, during the EAW comment period, approximately 75% of the data we had previously reviewed was no longer available, and the current systems in place prevent continued inspection or re-review, requiring substantial time, of the compromised data set.

These actions directly and substantially impaired our ability—and the ability of other residents—to submit informed and complete comments within the EAW comment period and constitute a procedural defect that cannot be cured after the fact. Accordingly, we respectfully request that the EAW comment period be extended or restarted, until Steele County has fully complied with all public data obligations and residents are afforded a reasonable opportunity for meaningful inspection and understanding of the data required to participate in the environmental review process.

Respectfully,
Melissa Zimmerman
Matt Sennott
c/o East Side Corridor Residents

Comment #169

ESC EAW Comments #3

Formal Objection to Incomplete Environmental Assessment Worksheet (EAW), Withholding of Critical Floodplain and Bridge Risk Data, and Unlawful Consideration of a Finding of No Significant Impact (FONSI)

Submitted by: Owatonna East Side Corridor Residents
To: Ronald Gaines, Responsible Governmental Unit (RGU)

The Owatonna East Side Corridor residents submit this comment to formally object to the adequacy of the Environmental Assessment Worksheet (EAW) for the proposed East Side Corridor project and to place on the record that the EAW is legally incomplete under the Minnesota Environmental Policy Act (MEPA) and insufficient under the National Environmental Policy Act (NEPA) to support any Finding of No Significant Impact (FONSI).

This objection is submitted to preserve the administrative record and to ensure that environmental review complies with state and federal law before any further project action is taken.

---

1. Required Floodplain and Bridge Risk Assessment Data Is Missing from the EAW

The EAW fails to include required floodplain and bridge risk assessment documentation, including but not limited to:

- Flood fringe impact analyses
- Evaluation of floodwater storage loss
- Hydraulic modeling of altered flood flows
- Bridge-related flood risk assessments
- Design-level floodplain impact documentation customarily required for projects involving roadway and bridge construction within or adjacent to floodplains

Construction within the flood fringe removes floodwater storage, alters hydraulic behavior, and may increase flood elevations, velocities, and risk to adjacent or downstream properties. These impacts are well-recognized under state and federal environmental review standards.

The EAW contains **no quantitative flood modeling, hydraulic analysis, or disclosed risk assessment** addressing these issues. Without such information, neither the public nor the RGU can evaluate whether flood-related impacts may be significant.

Under MEPA, an EAW must provide sufficient information to determine whether a project *may* have the potential for significant environmental effects (Minn. Stat. § 116D.04; Minn. R. 4410.1000). Under NEPA, agencies must take a “hard look” at environmental consequences and disclose them prior to decision-making (40 C.F.R. §§ 1500–1508).

The absence of this foundational information renders the EAW legally inadequate.

---

2. Withholding of Critical Technical Information Denies Meaningful Public Participation

Floodplain and bridge-related impact information has been requested by residents and affected parties and has not been disclosed or incorporated into the EAW. Proceeding with environmental review while withholding critical technical data prevents meaningful public participation.

MEPA requires that environmental review occur early and with sufficient information to allow public understanding and input (Minn. R. 4410.1600). NEPA similarly requires agencies to make environmental information available to the public before decisions are made (40 C.F.R. § 1506.6).

An environmental review process that withholds core impact data deprives the public of the ability to:

- Evaluate environmental risks
- Seek independent expert review
- Submit informed and meaningful comments

This procedural defect independently precludes issuance of a lawful FONSI.

---

3. A FONSI Cannot Be Lawfully Issued on an Incomplete or Withheld Record

A Finding of No Significant Impact may not be issued where the environmental record is incomplete, internally deficient, or based on undisclosed assumptions.

Because the EAW does not disclose or analyze floodplain impacts, floodwater storage loss, or flood-related risk associated with bridge and roadway construction—and because requested technical information has not been provided—the RGU cannot lawfully conclude that the project will not have significant environmental effects.

Issuing a FONSI under these circumstances would be arbitrary and capricious and contrary to MEPA and NEPA requirements.

---

4. Failure to Fully Evaluate Reasonable Alternatives Further Triggers the Need for an EIS

Both MEPA and NEPA require consideration of reasonable alternatives, particularly those that may avoid or substantially reduce environmental impacts.

The EAW fails to fully evaluate feasible alternatives that would:

- Avoid flood fringe construction
- Reduce floodplain disturbance
- Minimize hydraulic risk
- Utilize existing right-of-way or less impactful alignments

The lack of a robust alternatives analysis further demonstrates that the EAW does not support a conclusion of no significant environmental impact.

---

5. Conclusion and Required Action

Because the EAW:

- Omits required floodplain and bridge risk assessment data
- Withholds critical technical information from the public
- Denies meaningful public participation
- Fails to disclose potentially significant flood-related impacts
- Does not adequately evaluate reasonable alternatives

the EAW is legally insufficient under MEPA and NEPA, and a Finding of No Significant Impact (FONSI) cannot be lawfully issued.

A full Environmental Impact Statement (EIS) is required to evaluate floodplain impacts, loss of floodwater storage, hydraulic risk, and feasible alternatives in compliance with state and federal law.

This objection is submitted to ensure these deficiencies are formally entered into the environmental review record and addressed before any further project action occurs.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #189A

Construction Year: 2025

East Side Corridor

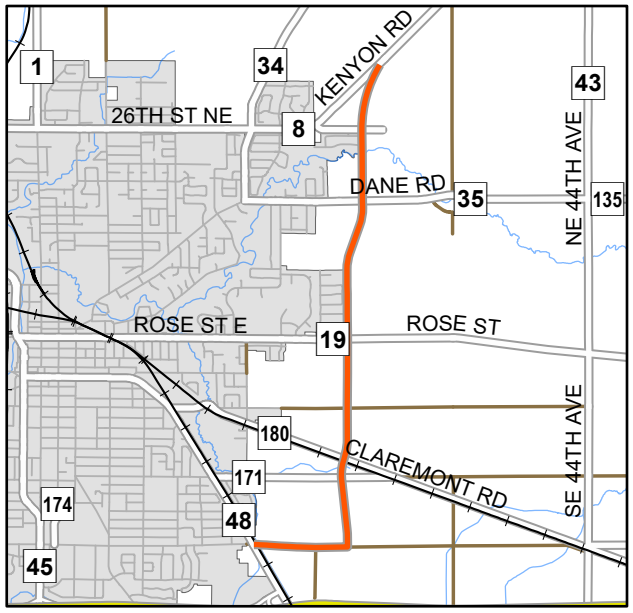
City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21



Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study is in progress during 2022. Depending on the final report, construction could be divided in stages from 2025 to 2027.

Project Justification

Traffic has no direct route for traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part of CSAH 43 to the east. While CSAH 43 will have connections to US 14 and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street SE.

Funding Source	Prev. Years	2023	2024	2025	2026	2027	Fut. Years	Total
Federal Funds	287,000			2,000,000	2,000,000			4,287,000
Other Local		150,000	275,000	1,000,000	450,000	875,000		2,750,000
State Aid				1,500,000	800,000	2,000,000		4,300,000
Sales Tax Revenue		450,000	825,000		550,000	625,000		2,450,000
Total	287,000	600,000	1,100,000	4,500,000	3,800,000	3,500,000		$13,787,000

Expenditure Type	Prev. Years	2023	2024	2025	2026	2027	Fut. Years	Total
Construction				4,500,000	3,500,000	3,500,000		11,500,000
Design Engineering		600,000			300,000			900,000
Preliminary Engineering	287,000							287,000
Right of Way			1,000,000					1,000,000
Utility			100,000					100,000
Total	287,000	600,000	1,100,000	4,500,000	3,800,000	3,500,000		$13,787,000

Comment #189B

Construction Year: 2026

East Side Corridor

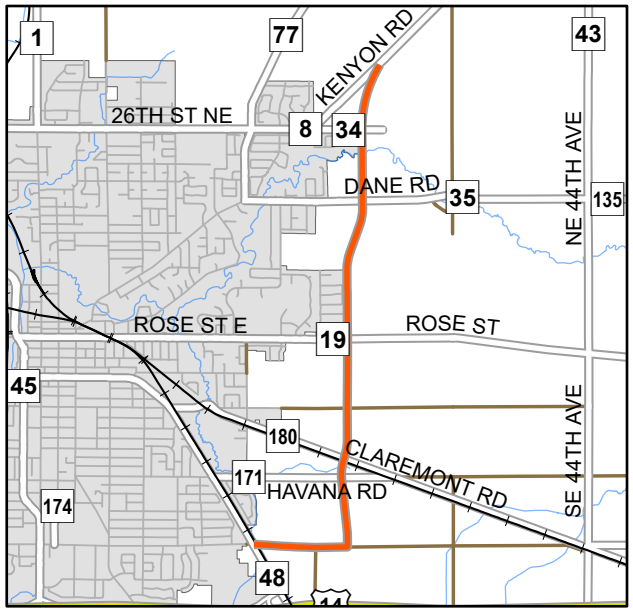
City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21



Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study and Environmental Report is in progress. Depending on the final report, construction could be divided in stages. A multi-use trail will also be constructed along side the route.

Project Justification

Traffic has no direct route for traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part of CSAH 43 to the east. While CSAH 43 will have connections to US 14 and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street SE.

Funding Source	Prev. Years	2024	2025	2026	2027	2028	Fut. Years	Total
Federal Funds	287,000			4,000,000				4,287,000
Other Local		30,000	105,000	410,000	315,000			860,000
Sales Tax Revenue	20,000	570,000	1,995,000	3,400,000	3,585,000			9,570,000
State Aid				1,390,000	3,400,000			4,790,000
Total	307,000	600,000	2,100,000	9,200,000	7,300,000			19,507,000

Expenditure Type	Prev. Years	2024	2025	2026	2027	2028	Fut. Years	Total
Construction				9,200,000	7,300,000			16,500,000
Design Engineering		600,000	300,000					900,000
Preliminary Engineering	307,000							307,000
Right of Way			1,500,000					1,500,000
Utility			300,000					300,000
Total	307,000	600,000	2,100,000	9,200,000	7,300,000			19,507,000

Comment #189C

Construction Year: 2026

East Side Corridor

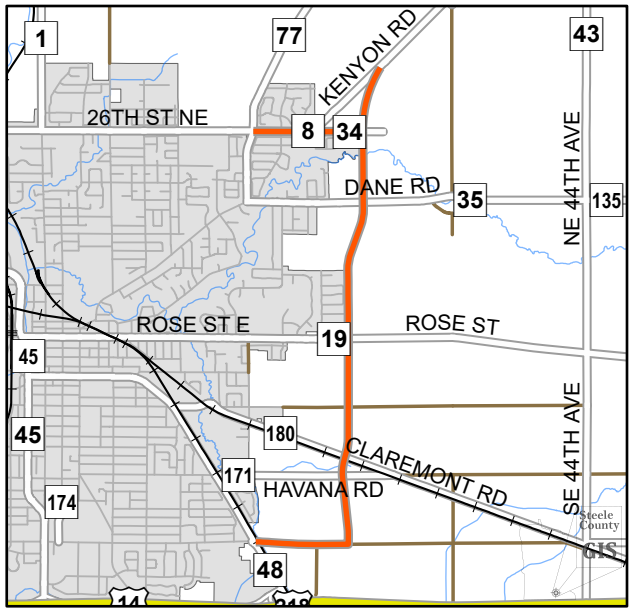
City of Owatonna & Owatonna Township

Project Number	Project Type
074-070-010 & 074-021-006	Expansion

Functional Classification

Major Collector

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	5.01



Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study and Environmental Report is in progress. Depending on the final report, construction could be divided in stages. A multi-use trail will also be constructed along side the route.

Project Justification

Traffic has no direct route for traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part of CSAH 43 to the east. While CSAH 43 will have connections to US 14 and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street SE.

Funding Source	Prev. Years	2025	2026	2027	2028	2029	Fut. Years	Total
Federal Funds	223,984		4,000,000					4,223,984
Fund Balance		200,000						200,000
Other Local		140,000	450,000	350,000				940,000
Sales Tax Revenue	20,000	3,160,000	3,400,000	5,250,000				11,830,000
State Aid			3,150,000	3,400,000				6,550,000
Total	243,984	3,500,000	11,000,000	9,000,000				23,743,984

Expenditure Type	Prev. Years	2025	2026	2027	2028	2029	Fut. Years	Total
Design Engineering		1,500,000						1,500,000
Preliminary Engineering	243,984	200,000						443,984
Right of Way		1,500,000						1,500,000
Utility		300,000						300,000
Construction			11,000,000	9,000,000				20,000,000
Total	243,984	3,500,000	11,000,000	9,000,000				23,743,984

Comment #189D

Construction Year: 2024

East Side Corridor (29th Ave)

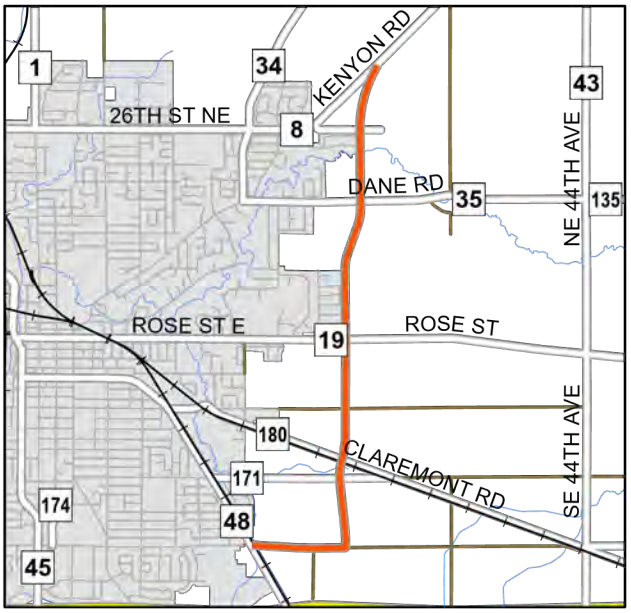
City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21



Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NW). The project could be built in stages over a couple of years.

Project Justification

Traffic has no direct route to traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part of CSAH 43 to the east. While CSAH 43 will have connections to US 14 and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street NW.

Funding Source	Prev. Years	2022	2023	2024	2025	2026	Fut. Years	Total
Bridge Funding - Fund 29						500,000		500,000
Federal Funds		200,000		2,000,000	2,000,000			4,200,000
Other Local				500,000	500,000	750,000		1,750,000
Sales Tax Revenue			1,350,000		300,000			1,650,000
State Aid				1,500,000	1,500,000	2,250,000		5,250,000
Total		200,000	1,350,000	4,000,000	4,300,000	3,500,000		$13,350,000

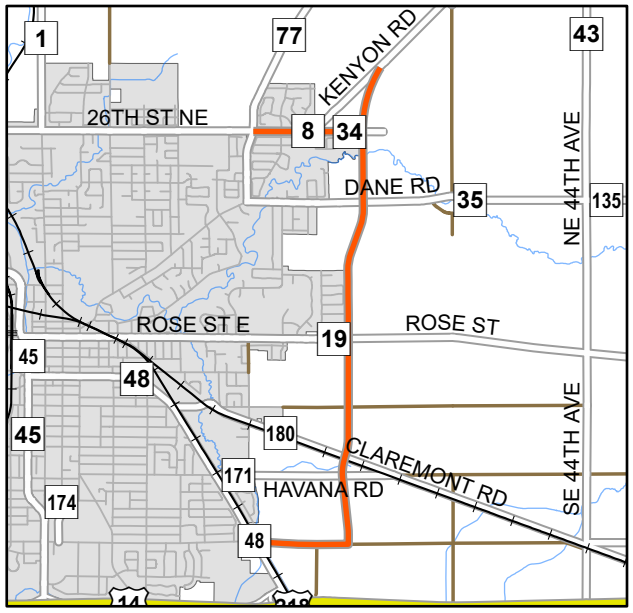
Expenditure Type	Prev. Years	2022	2023	2024	2025	2026	Fut. Years	Total
Construction				4,000,000	4,000,000	3,500,000		11,500,000
Design Engineering			600,000		300,000			900,000
Preliminary Engineering		200,000						200,000
Right of Way			650,000					650,000
Utility			100,000					100,000
Total		200,000	1,350,000	4,000,000	4,300,000	3,500,000		$13,350,000

Comment #189E

Construction Year: 2027

East Side Corridor

City of Owatonna & Owatonna Township



Project Number	Project Type
074-070-010 & 074-021-006	Expansion

Functional Classification

Major Collector

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	5.01

Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study and Environmental Report is in progress. Depending on the final report, construction could be divided in stages. A multi-use trail will also be constructed along side the route.

Project Justification

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Draft

Funding Source	Prev. Years	2026	2027	2028	2029	2030	Fut. Years	Total
Federal Funds	223,984							223,984
Fund Balance	640,000							640,000
Other Local		140,000	500,000	400,000				1,040,000
Sales Tax Revenue	20,000	3,160,000	9,000,000	1,200,000				13,380,000
State Aid			5,500,000	8,400,000				13,900,000
Total	883,984	3,300,000	15,000,000	10,000,000				29,183,984

Expenditure Type	Prev. Years	2026	2027	2028	2029	2030	Fut. Years	Total
Construction			15,000,000	10,000,000				25,000,000
Design Engineering		1,500,000						1,500,000
Preliminary Engineering	883,984							883,984
Right of Way		1,500,000						1,500,000
Utility		300,000						300,000
Total	883,984	3,300,000	15,000,000	10,000,000				29,183,984

Comment #192

ESC EAW Comments #2

EAW COMMENT — Incompatible Land Uses and Property Value Impacts

The EAW fails to evaluate the combined impacts of introducing **high-intensity land uses**—including a new roadway/highway facility and proposed mixed-use or commercial development—adjacent to **established residential neighborhoods**.

Planning and appraisal literature consistently recognize that proximity to highways and commercial uses can **reduce residential property values**, particularly for homes directly adjacent to the use, due to noise, vibration, air emissions, traffic, lighting, safety concerns, and loss of privacy. These impacts are not temporary and are not fully mitigated by berms or noise walls.

The EAW does not analyze property value impacts, land-use compatibility, or whether appropriate setbacks, buffering, or planning standards exist to protect existing neighborhoods before intensifying adjacent land uses. Proceeding without this analysis understates socioeconomic and environmental impacts and prevents meaningful public review.

Because these impacts are foreseeable, permanent, and disproportionately borne by existing residents, the EAW is incomplete. A full Environmental Impact Statement (EIS) is necessary to evaluate land-use compatibility, property value impacts, avoidance alternatives, and cumulative effects before any irreversible decisions are made.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #193

Date: December 18, 2025

Submitted to:
Ronald Gaines – Steele County Responsible Governmental Unit (RGU)

Re: FAILURE TO PROVIDE "EARLY AND OFTEN" PUBLIC NOTICE

MEPA requires early, meaningful public participation

Minnesota's Environmental Policy Act (MEPA) requires that environmental review and public participation occur **early enough to influence project decisions**, and that notice be sufficient to allow the public to meaningfully engage before alternatives are narrowed or impacts assumed.

Insufficient notice of the first public open house

The County first provided public notice of this project's initial open house on **July 19, 2022**, with the open house held on **July 21, 2022**, allowing only **two days' notice** before the first public-facing meeting. [See Exhibit 1: Public notice dated July 19, 2022 for Open House dated July 21, 2022.]

This open house represented the **public's first opportunity** to learn of the project, review proposed alignments, and understand potential environmental and residential impacts.

Why This Notice Was Not Sufficient Under MEPA

A two-day notice period does not constitute sufficient notice under MEPA, particularly where:

- The meeting represents the **first public disclosure** of a project with significant residential and environmental impacts; and
- The notice period occurred during **summer vacation months**, when many residents are away or otherwise unavailable on short notice.

Meaningful participation requires time for residents to become aware of the project, review materials, and arrange attendance. In this instance, the short notice materially constrained the ability of impacted residents to participate. As one directly impacted resident, I was required to **leave a previously planned vacation early** in order to attend the open house.

MEPA's "early and often" public participation requirement is not satisfied where notice is so limited that attendance and engagement depend on extraordinary effort or chance availability. Because adequate notice was not provided at the outset of the process, public participation did not occur early enough to meaningfully influence project development, and this procedural defect cannot be cured by later engagement.

Melissa Zimmerman
Owatonna, MN
Directly impacted resident

https://www.southernminn.com/owatonna_peoples_press/community/open-house-for-proposed-east-side-corridor/article_b1c0f562-0776-11ed-b650-f38c41463f2d.html

Open house for proposed East Side Corridor

Jul 19, 2022

Steele County and the City of Owatonna are inviting the public to an open house meeting to review alternatives and provide feedback for the East Side Corridor Project.

The project is investigating options for the construction of a north-south route on the east side of the City of Owatonna from 18th Street SE to 26th Street NW and the route's connections to existing and proposed streets.

The meeting date, time and location are: Thursday, July 21, 4-6 p.m.

Steele County Fairgrounds Community Center

1380 South Elm Avenue Owatonna, MN 55060

Traffic currently has no direct way for traveling between the northeast and southeast part of Owatonna. Existing highways and streets direct traffic towards the downtown area adding unnecessary traffic and increasing travel times. The new corridor would help alleviate that concern.

After alternates are considered and corridor details are finalized with this study, the project is programmed to be constructed within the next few years.

Privacy - Terms

For more information about the project, or if you are unable to make the open house, check out the following webpage: www.eastsidecorridor.com . The website provides more information about the project and provides an opportunity to take a brief survey and provide feedback on the project.

Comment #196A

ESC EAW Comments #42

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

To Whom: I've been coming down to visit a resident of Owatonna for three years regularly and know at least one resident whose family lives adjacent to this possible development. And, having become well acquainted with the issues related to this proposed roadway: I would suggest that you do not encroach upon the residential perimeter as it is today and further expand to include residential first and include commercial needs secondary out the half mile to the existing highway. Think about what you are really doing to even consider making such a proposal, there are codes and regulations regarding such development, and there are residents who knowingly chose to live along that perimeter! Sincerely, Kent Orman. kao”

Owatonna East Side Corridor Residents on behalf of Kent Orman
OwatonnaEastSideCorridor@gmail.com

Comment #196B

ESC EAW Comments #43

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

Before any more urban sprawl, let's tidy things up inside before tearing up more 'everything'...just saying

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196C

ESC EAW Comments #44

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

Due to the existing highways, Owatonna's natural development will always be east. It makes more sense to ensure there is more space to work with as we grow to try to avoid the cramped feeling one gets driving through the city and downtown areas.

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196D

ESC EAW Comments #45

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

“Never a good idea or plan to add traffic to a developing residential neighborhood.”

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196E

ESC EAW Comments #46

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

There is no reason to put a highway next to a developed residential neighborhood. Move it less than 1 mile east to 34th Ave. It will give more room for development for gas stations, grocery stores, ect. between the current neighborhood and highway.

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196F

ESC EAW Comments #47

There is no need to put a highway right next to a developed residential neighborhood. Please move this east less than 1 mile to 34th Ave. Less impact on Owatonna residence and leaves more room to develop between the current development and the highway.

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196G

ESC EAW Comments #48

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

There is no need to put a highway right next to a developed residential neighborhood. Please move this east less than 1 mile to 34th Ave. Less impact on Owatonna residence and leaves more room to develop between the current development and the highway.

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196H

ESC EAW Comments #49

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

This is a very unsafe and poor location for the corridor for many reasons. We need our elected officials who are supposed to work for the people to take this seriously. Bixby road and several other roads that are not as close to homes have 40 MPH speed limits. Putting the corridor on 29th is a bad plan for the cities growth to the east which will likely expand with the now 4 lane to Rochester.

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196I

ESC EAW Comments #50

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

“I am personally affected by this road being built”

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #196J

ESC EAW Comments #51

Please include the attached compilation of public comments submitted in connection with the East Side Corridor petition as part of the EAW record. These comments reflect community concern, lived impacts, and the level of public controversy associated with the project.

My kids deserve a safe neighborhood to play in and a highway takes so much safety and security from us. We are all for an East Side Corridor, it just needs to be done right. We shouldn't be building major infrastructure based on 30 year old plans that were outdated and abandoned 20+ years ago. Owatonna and Steele County needs to do better by their residents. For 30 years the message has been the same, use 34th Ave. But instead of listening we're repeating history and jeopardizing people's lives.

Owatonna East Side Corridor Residents on behalf of Resident
OwatonnaEastSideCorridor@gmail.com

Comment #198

ESC EAW Comments #30

Comment on Absence of Qualified Engineering Oversight During Environmental Review

This comment is to document a serious procedural failure in the environmental review and project oversight for the East Side Corridor (ESC): the advancement of project decisions during a prolonged period in which Steele County lacked a qualified County Engineer, while substantive authority was effectively delegated to the County's consulting firm, WSB.

From approximately **June 6 through October 28**, Steele County did not have a County Engineer in place. Despite this vacancy, the ESC continued to advance, unbeknownst to the public, including engineering, design, and decision-making actions with long-term implications.

During this period, **WSB was contracted to act as a project engineer**, beginning in July. As a result, WSB was placed in the position of:

- making or guiding technical and design decisions,
- shaping the scope and timing of work,
- influencing project advancement during environmental review, and
- determining the nature and extent of services for which it would later bill the County.

This arrangement raises fundamental concerns regarding **independent oversight, conflict of interest, and procedural integrity**.

Lack of Independent Professional Judgment

A consulting firm retained to design and advance a project cannot substitute for a public engineer charged with representing the County's interests, exercising independent professional judgment, and ensuring compliance with environmental review requirements.

By allowing the project to advance without a County Engineer, Steele County effectively ceded critical oversight functions to its consultant. This undermines the objectivity required during environmental review and erodes confidence that alternatives, mitigation, and sequencing decisions were evaluated independently.

Advancement of the Project Without Proper Authority

The environmental review process assumes that decisions are guided by a Responsible Governmental Unit exercising informed, independent judgment. Advancing a project during a period when no qualified engineer was employed — while relying on the same consultant that stood to benefit financially from continued scope expansion — is inconsistent with that requirement.

This structural failure is particularly concerning given that:

- design and mitigation work was occurring during environmental review,
- alternatives remained under consideration,
- and project scope and costs were continuing to evolve.

Implications for the EAW

The absence of qualified internal oversight during a critical phase of environmental review compromises the credibility of the EAW and the decisions made during that period. An environmental review cannot be considered adequate where key judgments were made without appropriate professional accountability and public stewardship.

This failure further supports the need for:

- rejection or supplementation of the current EAW, and
- preparation of a full Environmental Impact Statement (EIS) with **independent** oversight.

Conclusion

Environmental review is intended to inform decision-makers before commitments are made. That purpose is defeated when a project advances during a leadership vacuum and effective authority is delegated to a consultant with a direct financial interest in the project's expansion.

This comment is submitted for inclusion in the official EAW record.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #199

ESC EAW Comments #13

Avoidance Rejected for Non-Environmental Reasons – Improper Elimination of Feasible Alternatives

MEPA requires agencies to follow a mitigation hierarchy: **avoid impacts where feasible, minimize impacts where avoidance is not feasible, and mitigate remaining impacts**. This hierarchy is central to environmental decision-making and cannot be overridden by non-environmental considerations.

Internal correspondence and communications with state and county staff acknowledge that an avoidance option exists that would place the roadway at a substantially greater distance from existing homes—on the order of hundreds of feet rather than tens of feet. However, these same communications indicate that the avoidance option was rejected because it conflicted with city and township development agreements and anticipated land-use outcomes.

Rejecting an avoidance alternative because it does not align with development agreements or planned annexation is not a valid environmental basis for eliminating an alternative under MEPA. Environmental review must evaluate impacts first and cannot subordinate environmental considerations to development preferences or preexisting agreements.

The elimination of avoidance options for non-environmental reasons demonstrates improper narrowing of alternatives and predetermination of the project outcome. When avoidance is feasible but dismissed because it is inconvenient to development plans, the environmental review process is rendered meaningless.

Because feasible avoidance alternatives were rejected for reasons unrelated to environmental impact, the Environmental Assessment Worksheet fails to satisfy MEPA's alternatives analysis requirements and cannot support a Finding of No Significant Impact. A full Environmental Impact Statement is required to properly evaluate avoidance, minimization, and mitigation in compliance with MEPA.

Owatonna East Side Corridor Residents
owatonnaeastsidecorridor@gmail.com

From: Cabral Neto, Fausto (DOT) [redacted]
Sent: Monday, September 30, 2024 8:11 AM
To: Fenske, James W (DOT)
Subject: FW: Request for Clarification on East Side Corridor Project Updates and Concerns

fyi

From: Cabral Neto, Fausto (DOT)
Sent: Monday, September 30, 2024 7:29 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Bottos, Elisa (DOT) <elisa.bottos@state.mn.us>; Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: RE: Request for Clarification on East Side Corridor Project Updates and Concerns

Hello Paul,

I suggest to you, or your team, verify if are there new commentary among the new email that have not been responded to in 2023.
Provide response to those comments in combination to the commentary that will be received at future public meetings informing when it was initially addressed.
An environmental document captures all public input and provided responses.
In some instances, the already given answers can be repeated, if issues that it relates to haven't changed from the time when it was initially addressed.

Thanks

Fausto Cabral PE MS-ISE
507 251 1930
District State Aid Engineer
MN DOT District 6

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Monday, September 30, 2024 6:32 AM
To: Cabral Neto, Fausto (DOT) <fausto.cabral@state.mn.us>; Bottos, Elisa (DOT) [redacted] Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: Re: Request for Clarification on East Side Corridor Project Updates and Concerns

Looking for any thoughts on how to respond to this email full of inaccuracies and misinformation. Melissa has twisted things to meet her own agenda here. Shall we set up a teams meeting to discuss a response?I suggest a meeting with MnDOT, city and county engineers and administrators.

The study did look at all alternatives. She unfortunately doesn't like the fact that her preferred alternative didn't get past the purpose and need for the project and that we didn't study it in more detail. There are many reports in the memo outlining how we studied traffic and other information to come to that conclusion.

She's under the impression we were going to have a public meeting to discuss the chosen alternative but we already did, back in May 2023. There will be another public meeting for the final environmental document with a 30 day public comment period. And we've told her that. A meeting now will only confuse the majority of the public. I've gotten many comments of confusion why we even started over (NPCE vs PCE), so don't want to confuse the public even more.

The entire memo is public on our website and available for her to read. We put it out there as quick as possible just for her. And we've told her that. Including the previous 2 memos (purpose and need and evaluation criteria). We'll make other reports(wetlands, archaeological, traffic, noise, etc.) available on the website as we complete them. And I've told her that. I mentioned we have a few other updates to the website, but only just to summarize that 3rd memo. It takes time for our consultant to draft changes and then for the county and city to review before going live. And we are working on a newsletter to update the public. That will come soon. And we've told her that. Melissa needs to be patient.

We are doing a noise wall study. And a noise wall is only one alternative we are looking at. She was at the board meeting when we showed the board several options we are considering. That will come with all the other mitigation things that we must do. We've told Melissa many times that we can't look at mitigation, avoidance until we have the preferred alternative. Now we are starting those processes now that we have the memos completed.

I'm not sure how she has misunderstood that I said a noise wall will not be considered. Certainly I've said it's not in the county's interest due to the cost and if there is a way to avoid a wall we will. But we still need to follow the federal process and it will be considered. And I've told her that.

We aren't ready to discuss publicly, but other options to avoid the wall and address federal noise standards include moving the road 600-800 feet east, assuming it reduces noise impacts. It is feasible from the federal standpoint. How ever it has serious ramifications to the city and township and their development agreements, serious impacts to farmland since we already own 6 acres of land along the subdivision, and it would affect several farmer and their land, serious implications to area farmers and the many other people, who unlike Melissa, have always understood the road was going there and have told us they'd be very unhappy if we move it, serious impacts in how the city would redevelop that land with utilities, etc. All that discussion will like be looked at and included in the final reports.

The mitigation studies she is asking for is going to happen as we study impacts now and come up with avoidance and mitigations as we complete the environmental documentation. She needs patience. Ultimately she will unlikely be unhappy with the final results but we need to think of the county and city as a whole and not just her back yard.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 | M: (507) 475-2253 | paul.sponholz@steelecountymn.gov

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From: Lyssa Lynn [redacted]
Sent: Sunday, September 29, 2024 9:39 PM
To: Cabral Neto, Fausto (DOT) [redacted]
Cc: Gade, Dale (DOT) [redacted] Matthew Sennott [redacted]; Bottos, Elisa (DOT) [redacted] Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: Re: Request for Clarification on East Side Corridor Project Updates and Concerns

Hi Fausto,

We've reached out to the county and continue to receive conflicting information. Initially, we were told the current report needed to study all alternatives, but it didn't. We were also informed that there would be an open house and public comment period, with comments permanently tied to the project and used to determine the chosen alternative, but that isn't happening either. Additionally, we were assured that all information would be made public, yet as of Friday, Paul mentioned only some of it is now available. It feels as though the county and city are determined to push this project through, and as residents significantly impacted by this unprecedented initiative, we're simply trying to understand our rights, the process, and how to hold the RGU accountable.

If the county provided accurate information, transparency, and prioritized residents' safety, we wouldn't have needed to reach out. If you're not the right person to help us navigate this process and clarify what should be happening, could you please direct us to someone who can?

Unfortunately, the county has consistently proven to be an unreliable source of accurate information, starting from day one when Paul himself stated there were no plans for mitigation because other roads, built before homes, didn't require it—an entirely different situation. In last week's presentation, mitigations were mentioned, but only one complied with MNDoT regulations for noise mitigation. Over the last 2.5 years, Paul has repeatedly said a noise wall option wouldn't be considered, and while it was finally presented as an option, we have little confidence that anything is being handled correctly at this level. No options were provided to reroute in order to avoid noise impacts, which should be the case whenever possible. We're not downtown Minneapolis—it's possible here.

I appreciate your assistance in directing us to the right contact.

Thanks,
Melissa

On Fri, Sep 27, 2024, 1:11 PM Cabral Neto, Fausto (DOT) [redacted] wrote:

> Ms. Melissa Zimmerman,
>
> Please direct your inquiries to Steele County.
>
> Paul Sponholz is the new Steele County Engineer and I have his email on the cc list above.
>
> So far county has been following proper FHWA procedures for this project.
>
> Best Regards,
>
> Fausto Cabral PE MS-ISE
>
> 507 251 1930

Comment #200

ESC EAW Comments #25

Predetermination and Chilling of Public Participation Through Coordinated Public Messaging

The Environmental Assessment Worksheet (EAW) for the East Side Corridor is deficient due to a failure to ensure meaningful public participation, as required under MEPA and Minn. R. 4410. This deficiency is evidenced by internal coordination among City, County, and consultant staff regarding public-facing communications and responses to community input, which resulted in a chilling effect on public participation and an incomplete environmental record.

Public data obtained during this process demonstrates that project officials and consultants engaged in coordinated discussions about how to respond—or whether to respond at all—to public comments, including comments and information shared on social media and other informal public platforms. Internal correspondence reflects a focus on managing messaging, anticipating additional public input, and controlling the scope of public engagement, rather than facilitating open dialogue or incorporating community concerns into environmental analysis.

This approach to public engagement is inconsistent with the intent of MEPA. Meaningful public participation requires more than the technical availability of comment periods, which were also denied; it requires that agencies actively foster an environment in which residents can share information, raise concerns, and engage without those efforts being filtered, discouraged, or selectively addressed.

After internal communications reflecting this coordinated approach to public-facing comments became known through public data, residents significantly curtailed informal participation. Community members reduced sharing information, asking questions, and raising concerns through social media and other public forums. This reduction in engagement was not the result of diminished concern about the project, but rather reflects the practical impact of how public input was being managed. The resulting chilling effect helps explain why the EAW record does not fully reflect the scope, substance, and persistence of community concerns that existed throughout the planning process.

The consequence of this dynamic is an environmental review record that underrepresents public concern, omits issues raised outside narrowly managed channels, and fails to capture the full range of impacts and alternatives that warrant consideration. When public participation is functionally constrained in this way, the integrity of the environmental review is compromised.

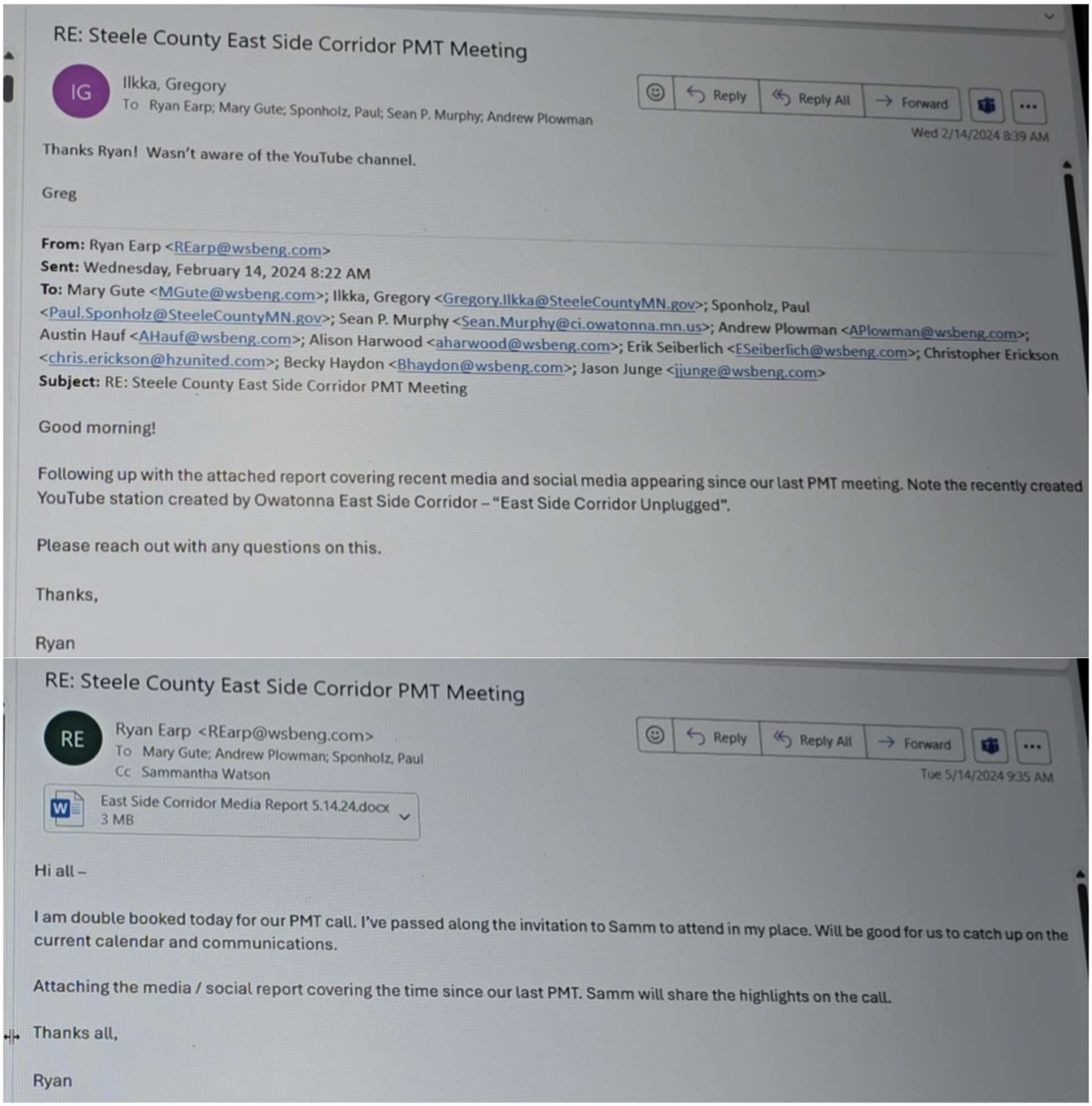
MEPA requires that environmental review be conducted with neutrality, transparency, and genuine public involvement. Where agency actions prioritize message control over engagement, and where those actions result in reduced participation and self-censorship by affected residents, the EAW cannot be relied upon as an accurate or complete disclosure document.

For these reasons, the EAW fails to meet the requirements of Minn. R. 4410 for meaningful public participation and objective environmental review. Supplemental environmental review, including preparation of an Environmental Impact Statement (EIS), is warranted to ensure that public concerns, alternatives, and environmental impacts are fully and fairly evaluated.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Availability of Records

Due to deletion, destruction, or loss of public data that was previously within the County's possession, official copies of certain records were not available for inspection or duplication. As a result, the best available evidence consists of screen captures from video recordings. Where portions of emails or documents are difficult to read, the visible content has been transcribed verbatim below the image to preserve accuracy and context.



RE: Steele County East Side Corridor PMT Meeting

IG Ilkka, Gregory
To Ryan Earp; Mary Gute; Sponholz, Paul; Sean P. Murphy; Andrew Plowman

Reply | Reply All | Forward

Wed 2/14/2024 8:39 AM

Thanks Ryan! Wasn't aware of the YouTube channel.

Greg

From: Ryan Earp <REarp@wsbeng.com>
Sent: Wednesday, February 14, 2024 8:22 AM
To: Mary Gute <MGute@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Andrew Plowman <APlowman@wsbeng.com>; Austin Hauf <AHauf@wsbeng.com>; Alison Harwood <aharwood@wsbeng.com>; Erik Seiberlich <ESeiberlich@wsbeng.com>; Christopher Erickson <chris.erickson@hzunited.com>; Becky Haydon <Bhaydon@wsbeng.com>; Jason Junge <jjunge@wsbeng.com>
Subject: RE: Steele County East Side Corridor PMT Meeting

Good morning!

Following up with the attached report covering recent media and social media appearing since our last PMT meeting. Note the recently created YouTube station created by Owatonna East Side Corridor – "East Side Corridor Unplugged".

Please reach out with any questions on this.

Thanks,

Ryan

RE: Steele County East Side Corridor PMT Meeting

RE Ryan Earp <REarp@wsbeng.com>
To Mary Gute; Andrew Plowman; Sponholz, Paul
Cc Sammantha Watson

Reply | Reply All | Forward

Tue 5/14/2024 9:35 AM

East Side Corridor Media Report 5.14.24.docx
3 MB

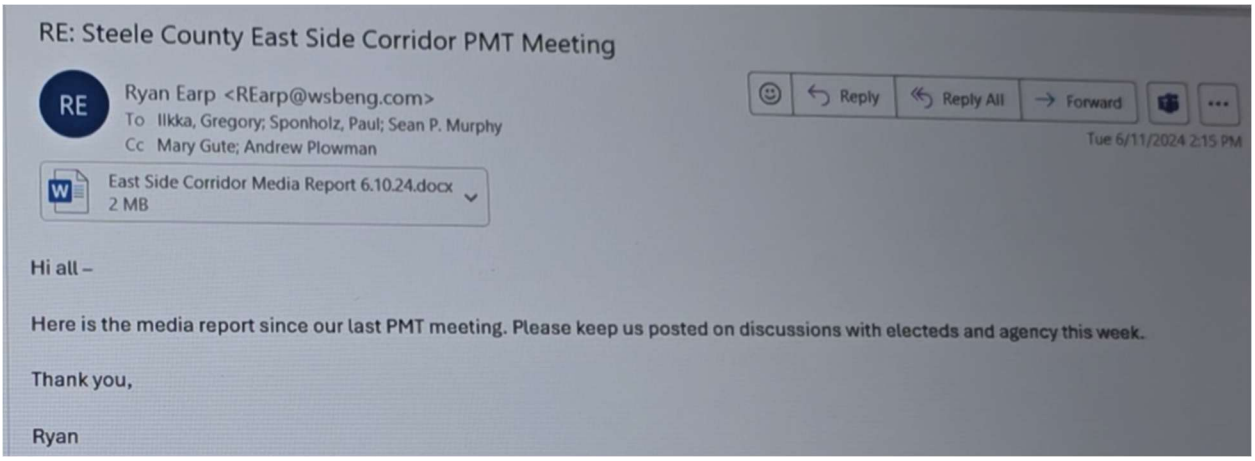
Hi all –

I am double booked today for our PMT call. I've passed along the invitation to Samm to attend in my place. Will be good for us to catch up on the current calendar and communications.

Attaching the media / social report covering the time since our last PMT. Samm will share the highlights on the call.

Thanks all,

Ryan


RE: Steele County East Side Corridor PMT Meeting

RE Ryan Earp <REarp@wsbeng.com>
To Ilkka, Gregory; Sponholz, Paul; Sean P. Murphy
Cc Mary Gute; Andrew Plowman

Reply | Reply All | Forward

Tue 6/11/2024 2:15 PM

East Side Corridor Media Report 6.10.24.docx
2 MB

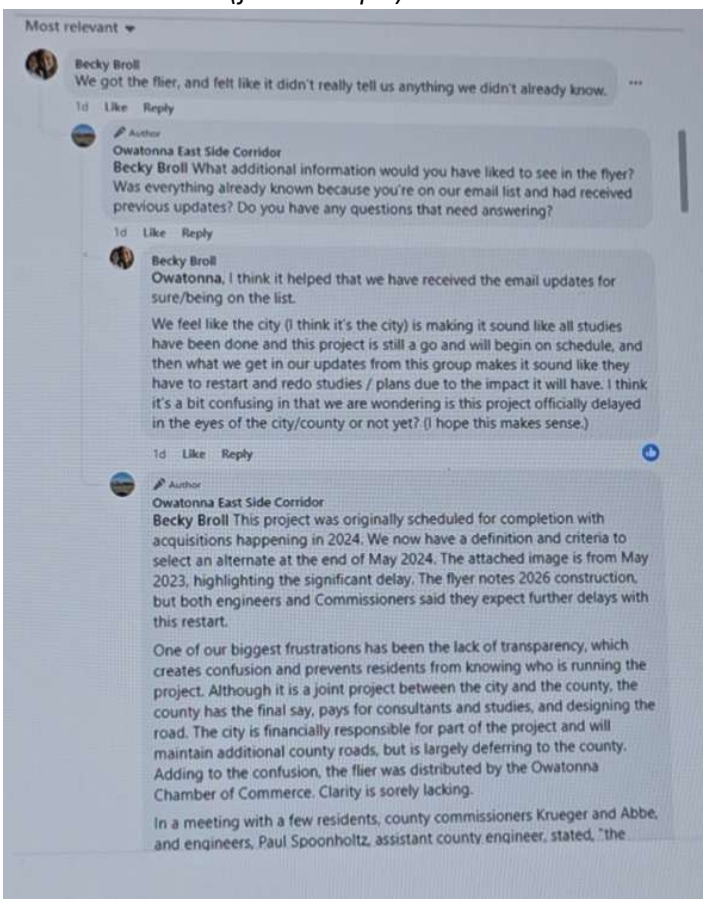
Hi all –

Here is the media report since our last PMT meeting. Please keep us posted on discussions with electeds and agency this week.

Thank you,

Ryan

Social Media Posts (just a sample):


Most relevant

Becky Broll
We got the flier, and felt like it didn't really tell us anything we didn't already know.
1d Like Reply

Author
Owatonna East Side Corridor
Becky Broll What additional information would you have liked to see in the flyer? Was everything already known because you're on our email list and had received previous updates? Do you have any questions that need answering?
1d Like Reply

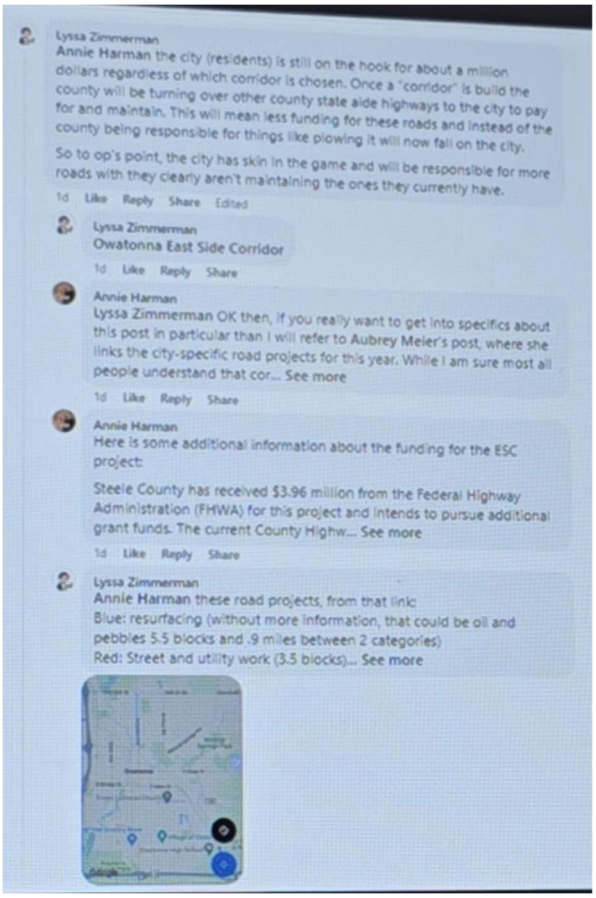
Becky Broll
Owatonna, I think it helped that we have received the email updates for sure/being on the list.

We feel like the city (I think it's the city) is making it sound like all studies have been done and this project is still a go and will begin on schedule, and then what we get in our updates from this group makes it sound like they have to restart and redo studies / plans due to the impact it will have. I think it's a bit confusing in that we are wondering is this project officially delayed in the eyes of the city/county or not yet? (I hope this makes sense.)
1d Like Reply

Author
Owatonna East Side Corridor
Becky Broll This project was originally scheduled for completion with acquisitions happening in 2024. We now have a definition and criteria to select an alternate at the end of May 2024. The attached image is from May 2023, highlighting the significant delay. The flyer notes 2026 construction, but both engineers and Commissioners said they expect further delays with this restart.

One of our biggest frustrations has been the lack of transparency, which creates confusion and prevents residents from knowing who is running the project. Although it is a joint project between the city and the county, the county has the final say, pays for consultants and studies, and designing the road. The city is financially responsible for part of the project and will maintain additional county roads, but is largely deferring to the county. Adding to the confusion, the flier was distributed by the Owatonna Chamber of Commerce. Clarity is sorely lacking.

In a meeting with a few residents, county commissioners Krueger and Abbe, and engineers, Paul Spoonholtz, assistant county engineer, stated, "the


Lyssa Zimmerman
Annie Harman the city (residents) is still on the hook for about a million dollars regardless of which corridor is chosen. Once a "corridor" is build the county will be turning over other county state aide highways to the city to pay for and maintain. This will mean less funding for these roads and instead of the county being responsible for things like plowing it will now fall on the city.

So to op's point, the city has skin in the game and will be responsible for more roads with they clearly aren't maintaining the ones they currently have.
1d Like Reply Share Edited

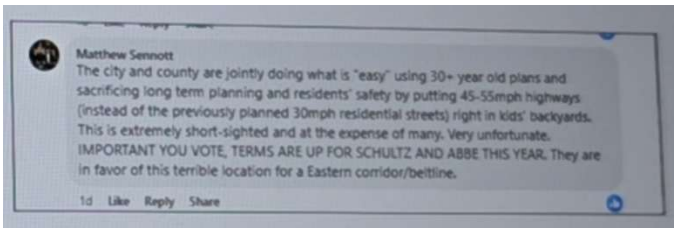
Lyssa Zimmerman
Owatonna East Side Corridor
1d Like Reply Share

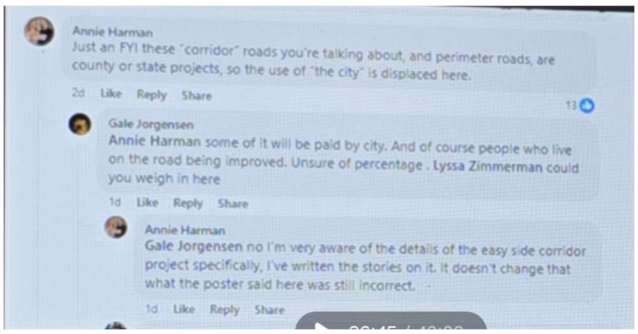
Annie Harman
Lyssa Zimmerman OK then, if you really want to get into specifics about this post in particular than I will refer to Aubrey Meier's post, where she links the city-specific road projects for this year. While I am sure most all people understand that cor... See more
1d Like Reply Share

Annie Harman
Here is some additional information about the funding for the ESC project:

Steele County has received $3.96 million from the Federal Highway Administration (FHWA) for this project and intends to pursue additional grant funds. The current County Highw... See more
1d Like Reply Share

Lyssa Zimmerman
Annie Harman these road projects, from that link:
Blue: resurfacing (without more information, that could be oil and pebbles 5.5 blocks and .9 miles between 2 categories)
Red: Street and utility work (3.5 blocks)... See more

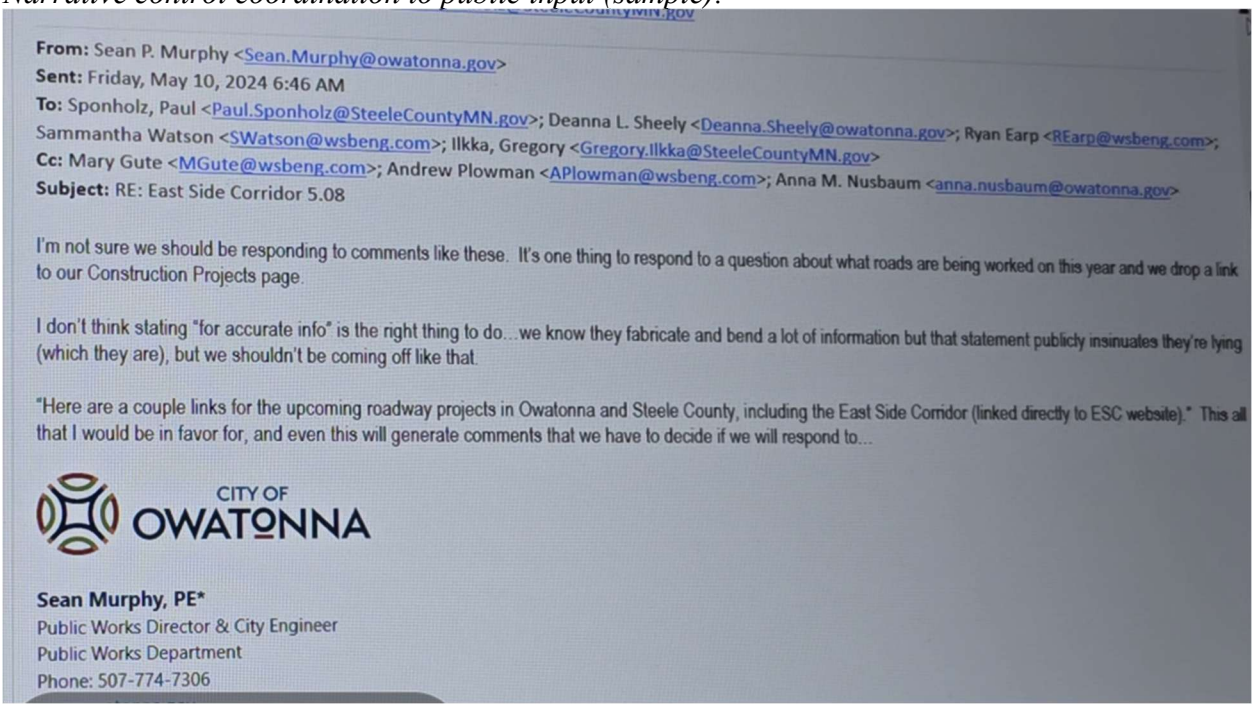

Matthew Sennott
The city and county are jointly doing what is "easy" using 30+ year old plans and sacrificing long term planning and residents' safety by putting 45-55mph highways (instead of the previously planned 30mph residential streets) right in kids' backyards. This is extremely short-sighted and at the expense of many. Very unfortunate.
IMPORTANT YOU VOTE, TERMS ARE UP FOR SCHULTZ AND ABBE THIS YEAR. They are in favor of this terrible location for a Eastern corridor/beltline.
1d Like Reply Share


Annie Harman
Just an FYI these "corridor" roads you're talking about, and perimeter roads, are county or state projects, so the use of "the city" is displaced here.
2d Like Reply Share 13

Gale Jorgensen
Annie Harman some of it will be paid by city. And of course people who live on the road being improved. Unsure of percentage . Lyssa Zimmerman could you weigh in here
1d Like Reply Share

Annie Harman
Gale Jorgensen no I'm very aware of the details of the easy side corridor project specifically, I've written the stories on it. It doesn't change that what the poster said here was still incorrect.
1d Like Reply Share

Narrative control coordination to public input (sample):



From: Sean P. Murphy <Sean.Murphy@owatonna.gov>
Sent: Friday, May 10, 2024 6:46 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Deanna L. Sheely <Deanna.Sheely@owatonna.gov>; Ryan Earp <REarp@wsbeng.com>; Sammantha Watson <SWatson@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>
Cc: Mary Gute <MGute@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Anna M. Nusbaum <anna.nusbaum@owatonna.gov>
Subject: RE: East Side Corridor 5.08

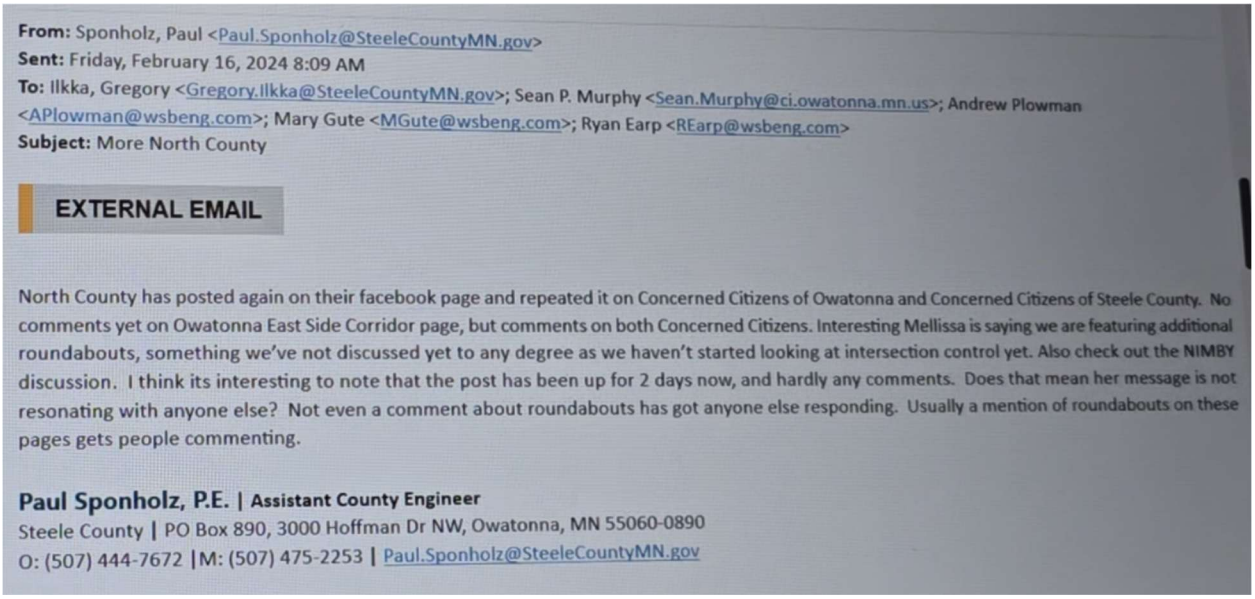
I'm not sure we should be responding to comments like these. It's one thing to respond to a question about what roads are being worked on this year and we drop a link to our Construction Projects page.

I don't think stating "for accurate info" is the right thing to do...we know they fabricate and bend a lot of information but that statement publicly insinuates they're lying (which they are), but we shouldn't be coming off like that.

"Here are a couple links for the upcoming roadway projects in Owatonna and Steele County, including the East Side Corridor (linked directly to ESC website)." This all that I would be in favor for, and even this will generate comments that we have to decide if we will respond to...

CITY OF OWATONNA

Sean Murphy, PE*
Public Works Director & City Engineer
Public Works Department
Phone: 507-774-7306

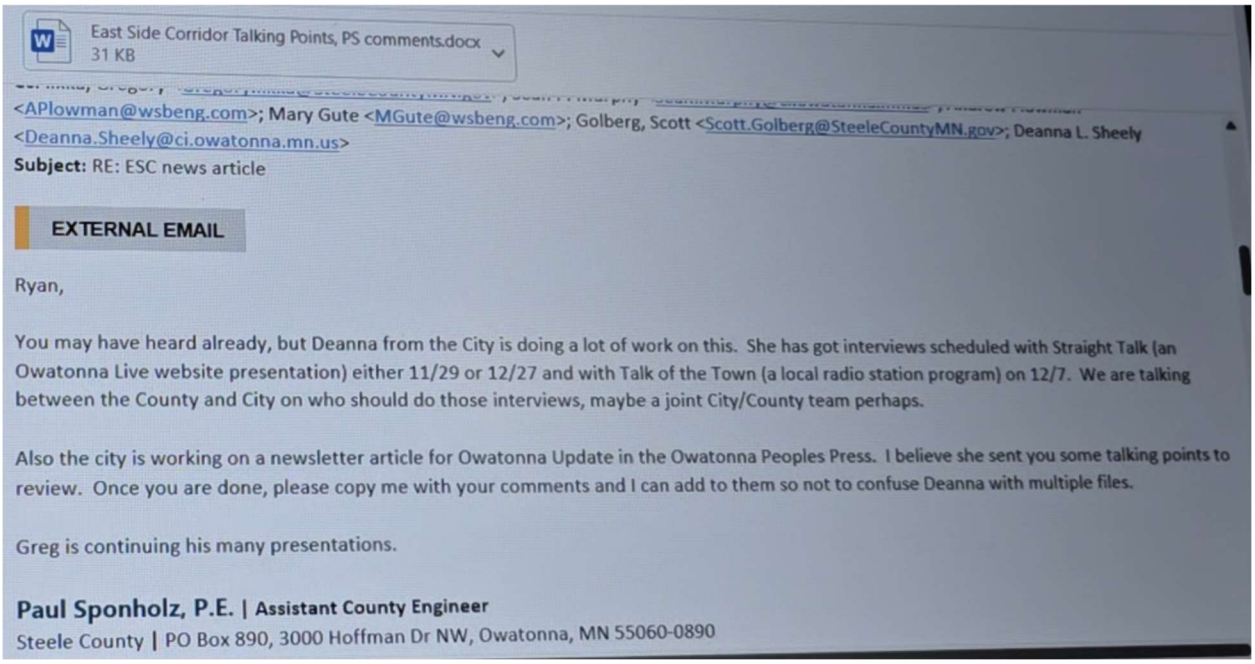


From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, February 16, 2024 8:09 AM
To: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>; Ryan Earp <REarp@wsbeng.com>
Subject: More North County

EXTERNAL EMAIL

North County has posted again on their facebook page and repeated it on Concerned Citizens of Owatonna and Concerned Citizens of Steele County. No comments yet on Owatonna East Side Corridor page, but comments on both Concerned Citizens. Interesting Mellissa is saying we are featuring additional roundabouts, something we've not discussed yet to any degree as we haven't started looking at intersection control yet. Also check out the NIMBY discussion. I think its interesting to note that the post has been up for 2 days now, and hardly any comments. Does that mean her message is not resonating with anyone else? Not even a comment about roundabouts has got anyone else responding. Usually a mention of roundabouts on these pages gets people commenting.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



East Side Corridor Talking Points, PS comments.docx
31 KB

<APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>; Golberg, Scott <Scott.Golberg@SteeleCountyMN.gov>; Deanna L. Sheely <Deanna.Sheely@ci.owatonna.mn.us>
Subject: RE: ESC news article

EXTERNAL EMAIL

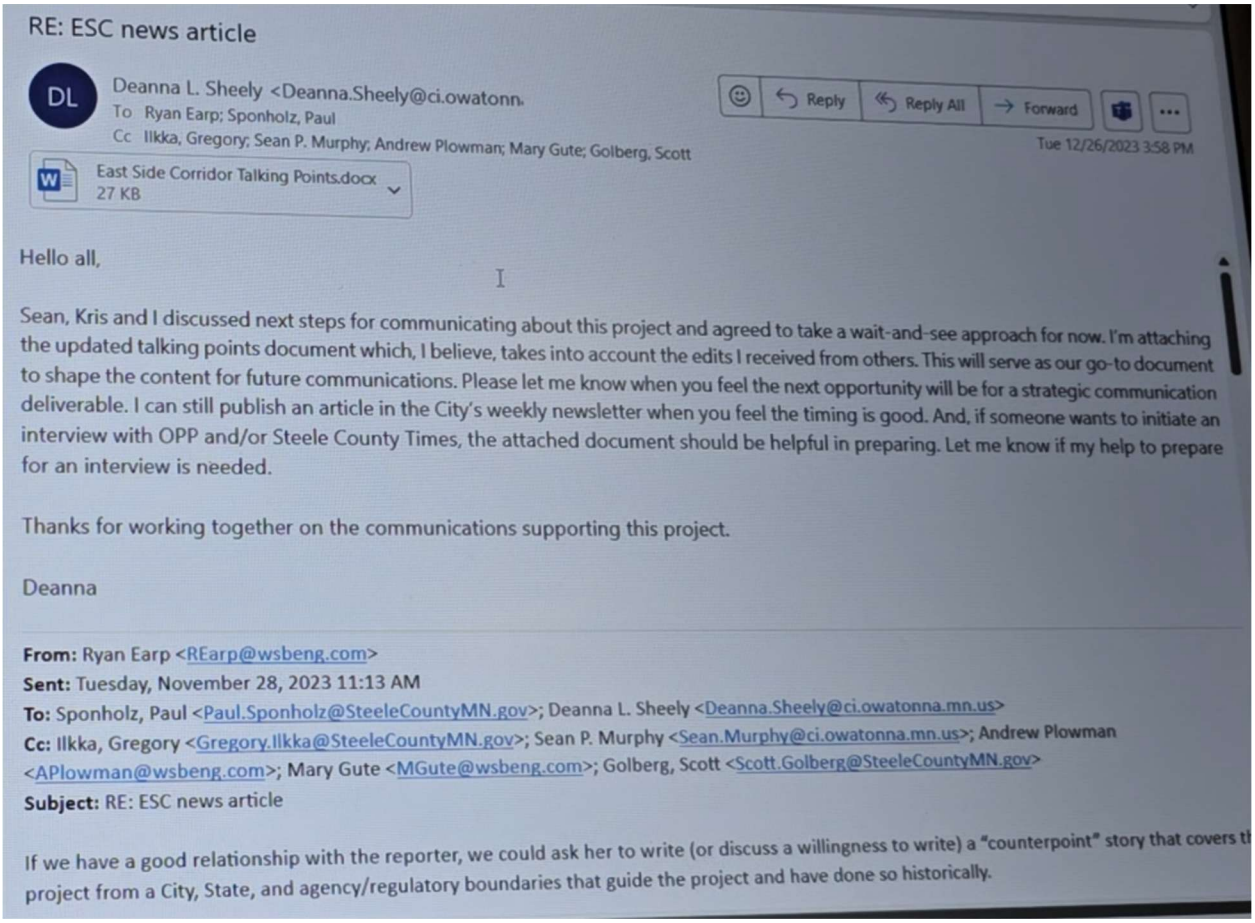
Ryan,

You may have heard already, but Deanna from the City is doing a lot of work on this. She has got interviews scheduled with Straight Talk (an Owatonna Live website presentation) either 11/29 or 12/27 and with Talk of the Town (a local radio station program) on 12/7. We are talking between the County and City on who should do those interviews, maybe a joint City/County team perhaps.

Also the city is working on a newsletter article for Owatonna Update in the Owatonna Peoples Press. I believe she sent you some talking points to review. Once you are done, please copy me with your comments and I can add to them so not to confuse Deanna with multiple files.

Greg is continuing his many presentations.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890



RE: ESC news article

DL Deanna L. Sheely <Deanna.Sheely@ci.owatonn.
To Ryan Earp; Sponholz, Paul
Cc Ilkka, Gregory; Sean P. Murphy; Andrew Plowman; Mary Gute; Golberg, Scott

Reply | Reply All | Forward
Tue 12/26/2023 3:58 PM

East Side Corridor Talking Points.docx
27 KB

Hello all,

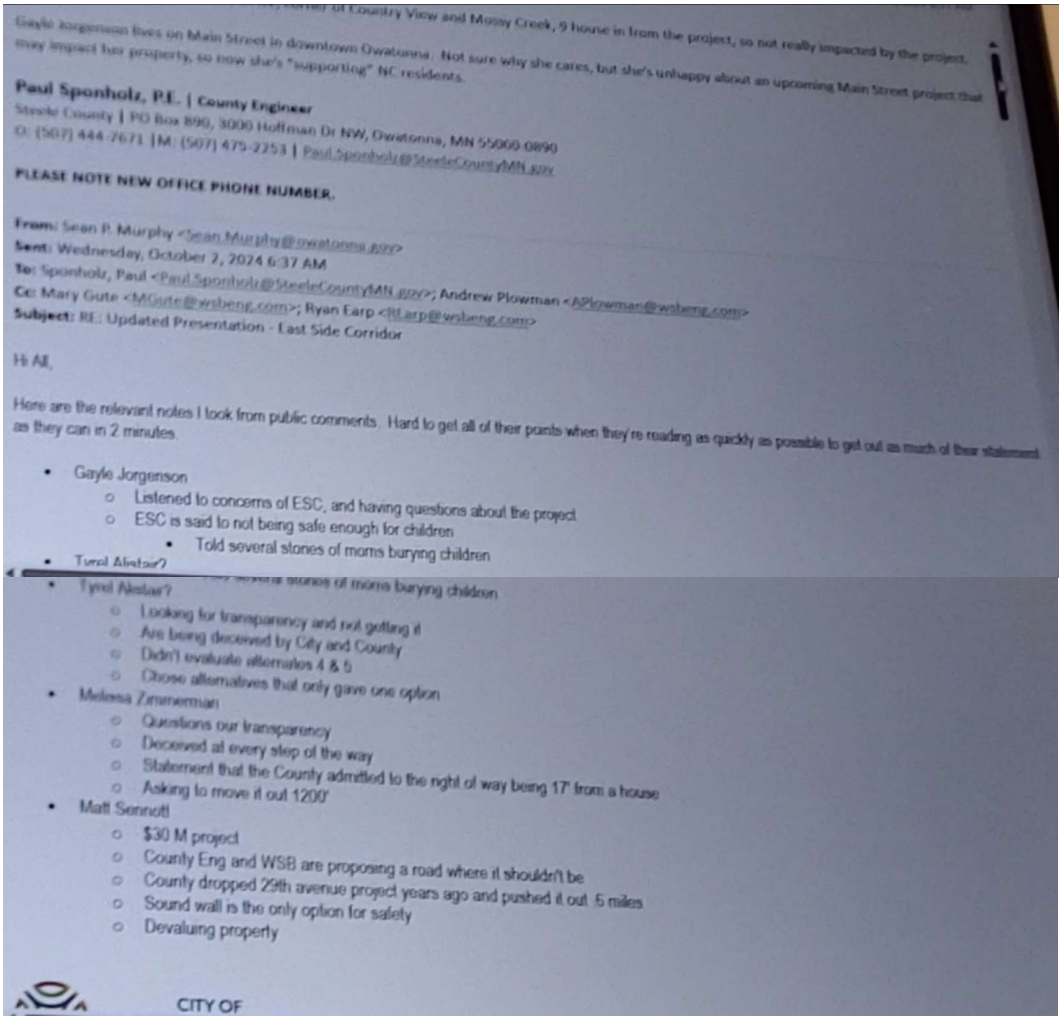
Sean, Kris and I discussed next steps for communicating about this project and agreed to take a wait-and-see approach for now. I'm attaching the updated talking points document which, I believe, takes into account the edits I received from others. This will serve as our go-to document to shape the content for future communications. Please let me know when you feel the next opportunity will be for a strategic communication deliverable. I can still publish an article in the City's weekly newsletter when you feel the timing is good. And, if someone wants to initiate an interview with OPP and/or Steele County Times, the attached document should be helpful in preparing. Let me know if my help to prepare for an interview is needed.

Thanks for working together on the communications supporting this project.

Deanna

From: Ryan Earp <REarp@wsbeng.com>
Sent: Tuesday, November 28, 2023 11:13 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Deanna L. Sheely <Deanna.Sheely@ci.owatonna.mn.us>
Cc: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>; Golberg, Scott <Scott.Golberg@SteeleCountyMN.gov>
Subject: RE: ESC news article

If we have a good relationship with the reporter, we could ask her to write (or discuss a willingness to write) a "counterpoint" story that covers t
project from a City, State, and agency/regulatory boundaries that guide the project and have done so historically.



Gayle Jorgenson lives on Main Street in downtown Owatonna. Not sure why she cares, but she's unhappy about an upcoming Main Street project that may impact her property, so now she's "supporting" NC residents.

Paul Sponholz, P.E. | County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

PLEASE NOTE NEW OFFICE PHONE NUMBER.

From: Sean P. Murphy <Sean.Murphy@owatonna.gov>
Sent: Wednesday, October 2, 2024 6:37 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Andrew Plowman <APlowman@wsbeng.com>
Cc: Mary Gute <MGute@wsbeng.com>; Ryan Earp <REarp@wsbeng.com>
Subject: RE: Updated Presentation - East Side Corridor

Hi All,

Here are the relevant notes I took from public comments. Hard to get all of their points when they're reading as quickly as possible to get out as much of their statement as they can in 2 minutes.

- Gayle Jorgenson
  - Listened to concerns of ESC, and having questions about the project
  - ESC is said to not being safe enough for children
    - Told several stories of moms burying children
- Tyrel Alastair?
  - Looking for transparency and not getting it
  - Are being deceived by City and County
  - Didn't evaluate alternates 4 & 5
  - Chose alternatives that only gave one option
- Melissa Zimmerman
  - Questions our transparency
  - Deceived at every step of the way
  - Statement that the County admitted to the right of way being 17' from a house
  - Asking to move it out 1200'
- Matt Sennott
  - $30 M project
  - County Eng and WSB are proposing a road where it shouldn't be
  - County dropped 29th avenue project years ago and pushed it out .5 miles
  - Sound wall is the only option for safety
  - Devaluing property

CITY OF

[Resident Name Address] corner of County View and Mossy Creek, 9 houses in from the project, so not really impacted by the project.

[Resident Name] lives on Main Street downtown Owatonna. Not sure why she care, but she's unhappy about an upcoming Main Street project that may impact her property so now she's "supporting" NC residents.
Paul Sponholz, P.E. | County Engineer

October 1, 2024 – WSB gave an ESC presentation the city council.

From: Sean Murphy
Sent: October 2, 2024 6:37 AM
To: Paul Sponholz, Andrew Plowman
CC: Mary Gute, Ryan Erp
Subject: RE: Updated Presentation – East Side corridor

Hi All,

Here are the relevant notes I took from public comments. Hard to get all their points when they're reading so quickly to get out as much of their statements as they can in 2 minutes.
…
Goes on to recap reach resident that spoke in regards to the ESC.

Comment #201

ESC EAW Comments #31

EAW Comment – Engineering Authority, Authorship, and Reliability

Lack of Licensed Engineering Oversight During Critical Project Decisions

Steele County was without a County Engineer from June 6 through October 28, 2025. Despite this vacancy, the East Side Corridor project continued to advance, including the preparation and issuance of the Environmental Assessment Worksheet (EAW).

At an October 17, 2025 OAH hearing, County Administrator Renae Fry testified under oath that there had been no County Engineer in place since June 6, 2025. This testimony directly conflicts with the public representation that an interim engineer had been serving in that role throughout the summer and early fall. Public minutes show multiple title changes in that time.

Engineering projects of this scale cannot lawfully or professionally advance without oversight by a licensed County Engineer responsible for engineering judgment, verification, and accountability. The Responsible Governmental Unit (RGU), currently out Public Works Director also the interim engineering appointee, bear responsibility for ensuring the accuracy and completeness of engineering information relied upon in environmental review.

The EAW is dated November 2025 and bears the signature of the interim engineer on November 5, 2025, shortly after his October 28, 2025 appointment. This indicates that the interim engineer had approximately three days to review, verify, and certify the accuracy of an EAW representing years of technical analysis, public controversy, and complex environmental impacts.

Residents have been studying this project for more than three and a half years. City and County agencies have represented that they have studied it for approximately seven years. It is unclear how the interim engineer could reasonably and ethically verify the accuracy of the EAW in such a short period of time.

Further, during the public open house, the interim engineer demonstrated limited familiarity with the contents of the EAW, including:

- Incorrectly stating that noise studies were contained in the EAW when they were not,
- Asserting that avoidance alternatives could still be entertained despite their apparent elimination,
- Being unaware of “Alternative 3B,” which is referenced in the EAW but not included for public review, and
- Misstating residential setbacks by claiming homes were set substantially farther back than approximately 17 feet from the proposed right-of-way.

These statements raise serious concerns regarding whether the EAW was independently reviewed, questioned, or corrected by a qualified engineer prior to submission.

Minnesota professional standards prohibit engineers from signing or certifying work they did not prepare or adequately review. The record does not demonstrate that meaningful verification occurred. As a result, the EAW cannot be relied upon as an accurate or objective disclosure document.

Given the absence of continuous licensed engineering oversight, the compressed and unexplained certification timeline, and demonstrated inaccuracies presented to the public, the EAW fails to meet the standards of reasoned decision-making and informed public participation required under Minn. R. 4410. Because the EAW was certified during a period of disrupted engineering authority, contains demonstrated inaccuracies, and was presented by a certifying engineer unfamiliar with its contents, the **record cannot support a Finding of No Significant Impact,** and preparation of an **Environmental Impact Statement is required.**

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #202

ESC EAW Comment #22

Defective Notice and Denial of Meaningful Opportunity to Participate

Notice of the East Side Corridor Environmental Assessment Worksheet (EAW) was not timely, adequate, or complete. Impacted residents—including residents who had specifically requested project updates and notifications—did not receive notice until approximately two weeks **after** the public comment period had already opened. As a result, a substantial portion of the comment period elapsed before affected residents were even aware that an environmental review was underway.

In addition, residents who had affirmatively requested project updates and notifications did not receive the Environmental Assessment Worksheet itself, as required by Minn. R. 4410.1500 (A)(13). Notice was provided without access to the environmental document subject to comment, requiring residents to independently locate a lengthy and technical record after the comment period had already begun. This fundamentally undermines meaningful participation and frustrates the purpose of public notice under MEPA.

Compounding these defects, not all impacted residents received postcard notice at all. The failure to notify both impacted properties and those who expressly sought notice resulted in unequal access to information and systematic exclusion of those most affected.

Meaningful public participation requires timely notice, access to the environmental review document, and reasonable opportunity to review and respond. Providing delayed notice, failing to distribute the EAW, and omitting impacted residents—including those who requested notification—from the notice process cannot be cured through post-hoc disclosures. These procedural failures independently preclude reliance on the EAW to support a Finding of No Significant Impact and support the need for an Environmental Impact Statement.

Owatonna East Side Corridor Residents

Comment #203

ESC EAW Comments #12

Denial of Public Comment and Hearing Following Presentation of the Preferred Alternative

On **September 24, 2024**, the project consultant, **WSB**, presented a **preferred alternative** for the East Side Corridor during a County Board work session. This presentation was the first-time residents became aware that a preferred alternative had been selected and was being advanced.

Although this presentation occurred during a work session attended by commissioners, it did **not** provide an opportunity for public comment, public testimony, or meaningful public engagement. Work sessions are not a substitute for public open houses or hearings required to ensure meaningful participation under MEPA, particularly when a preferred alternative is being advanced.

Following the September 24, 2024 presentation, residents were not provided with a new open house, public hearing, or formal comment period on the preferred alternative or its associated impacts. As a result, residents were denied an opportunity to comment on the actual alignment being advanced, including proximity to homes, traffic assumptions, noise impacts, mitigation measures, and the basis for narrowing or eliminating alternatives.

Subsequent to the work session presentation, the **61-page memorandum** was withheld from residents until they reached out to the state. Residents were therefore denied the opportunity to identify inaccuracies, omissions, and unsupported assumptions at the time such input would have been most meaningful.

Prior to the September 24, 2024 presentation, residents reasonably relied on assurances from County engineering staff and elected officials that additional meetings and public engagement would occur before decisions were advanced. At a March 25, 2024 stakeholder meeting, residents were told that further opportunities for discussion and input would be provided as the project progressed. Despite those assurances, residents were repeatedly told that additional meetings were unnecessary or premature, and no public meeting or comment opportunity was provided after the preferred alternative was presented to commissioners. When residents requested meetings following the presentation, they were told, “Later, we’re not at the point of conversations yet.”

This denial of a post-presentation comment opportunity is further corroborated by internal project correspondence obtained through public data requests, which reflects that no additional public meeting or formal comment period would be provided after the preferred alternative was presented, despite guidance that environmental review should capture and respond to public input even when an outcome remains unchanged.

MEPA requires early and continuous public participation, particularly at major decision points such as the identification and advancement of a preferred alternative. Proceeding with environmental review and decision-making without providing an opportunity for public comment after the September 24, 2024 presentation renders the process procedurally deficient.

Because the environmental record was developed and relied upon without public scrutiny at this critical stage, it cannot support a Finding of No Significant Impact. Preparation of a full Environmental Impact Statement is required.

Owatonna East Side Corridor Residents
owatonnaeastsidecorridor@gmail.com

RE: East Side Corridor 5.08

SP

Sponholz, Paul
To Andrew Plowman
Cc Ryan Earp; Mary Gute; Sammantha Watson

Reply | Reply All | Forward | ...

Wed 5/8/2024 10:22 AM

Andrew,

Do we have all the public comments from the May 2023 public info meeting compiled? Could you send them to me sometime today or tomorrow?

North Country is insisting on another public meeting before we sent the preferred alternative to FHWA, to which some of our board members have committed to. But if the preferred alternative is still 29th Ave (which was presented last May), my recommendation to Greg and the Board is that we already had a public meeting and have all the comments we need. Nothing has changed and FHWA does not require another one. So I'd like to share the public comments with the committee on Monday to help that discussion.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

FW: East Side Corridor

SP

Sponholz, Paul
To Andrew Plowman; Mary Gute
Cc Ilkka, Gregory; Sean P. Murphy

Reply | Reply All | Forward | ...

Thu 5/23/2024 3:52 PM

FYI, we have convinced the county board/city council committees that they don't need to review the next memo before FHWA concurrence, so I won't need you doing a preview of the memo anymore, and there won't be a vote until after the environmental documents are fully complete. Although that will surely invoke the ire of the neighborhood group.

From: Cabral Neto, Fausto (DOT)
Sent: Monday, September 30, 2024 8:11 AM
To: Fenske, James W (DOT)
Subject: FW: Request for Clarification on East Side Corridor Project Updates and Concerns

fyi

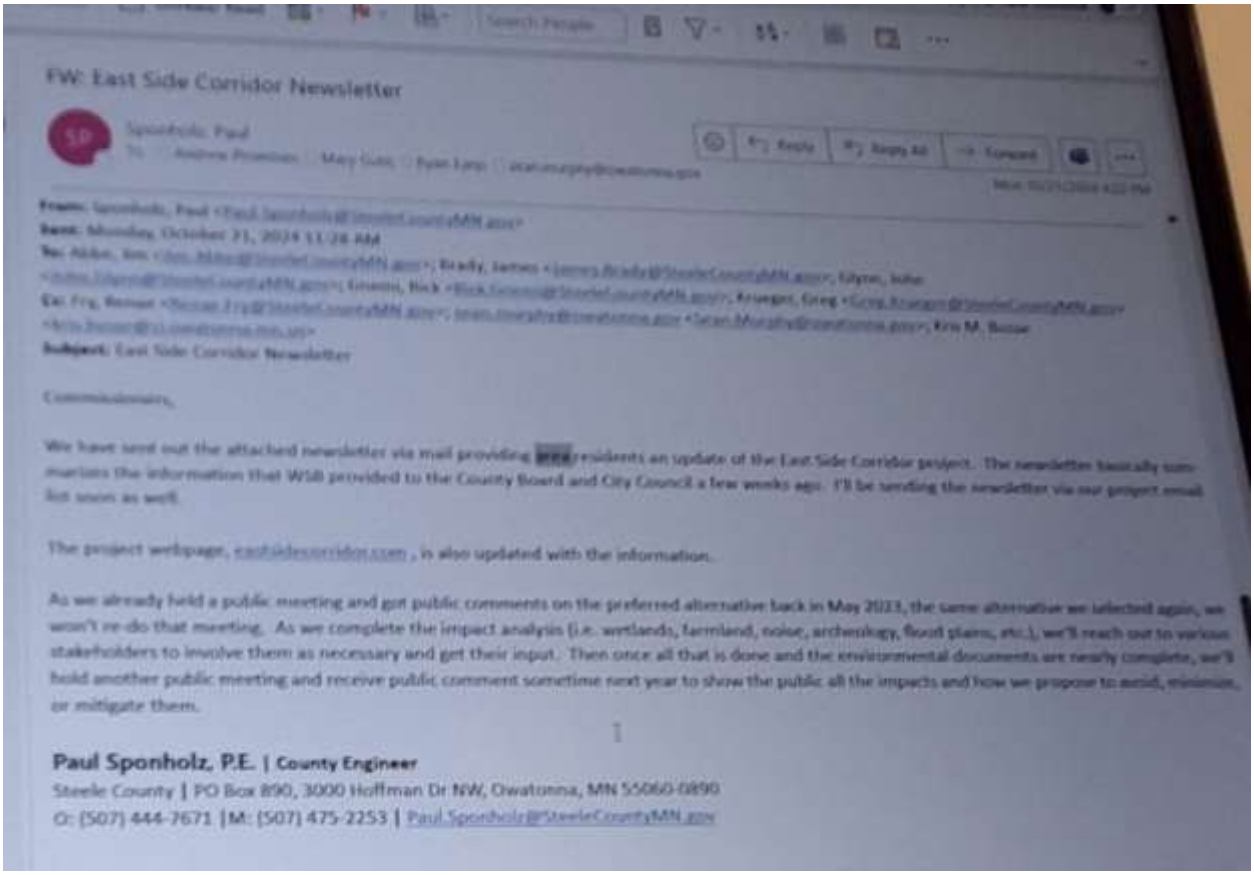
From: Cabral Neto, Fausto (DOT)
Sent: Monday, September 30, 2024 7:29 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Bottos, Elisa (DOT) <[redacted]>; Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: RE: Request for Clarification on East Side Corridor Project Updates and Concerns

Hello Paul,

I suggest to you, or your team, verify if are there new commentary among the new email that have not been responded to in 2023.
Provide response to those comments in combination to the commentary that will be received at future public meetings informing when it was initially addressed.
An environmental document captures all public input and provided responses.
In some instances, the already given answers can be repeated, if issues that it relates to haven't changed from the time when it was initially addressed.

Thanks

Fausto Cabral PE MS-ISE
507 251 1930
District State Aid Engineer
MN DOT District 6



FW: East Side Corridor Newsletter
Sponholz Paul
Sent: Mondy, October 21, 7024 11:78 AM
East Side Corridor Newsletter

We have sent out the attached newsletter via mail providing areas residents an update of the East Side Corridor project. The newsletter basically summarizes the information that WBS provided to the County Board and City Council a few weeks ago. I'll be sending the newsletter via our project email list soon as well.

The project webpage, eastsidecorridor.com, is also updated with the information.

As we already held a public meeting and got public comments on the preferred alternative back in May 2023, the same alternative was selected again, we won't re do that meeting. As we complete the impact analysis (ie. wetlands, farmland, noise, archeology, flood plains, etc.), we'll reach out to various stakeholders to involve them as necessary and get their input. Then once all that is done and the environmental documents are nearly complete, we'll hold another public meeting and receive public comment sometime next year to show the public all the impacts and how we propose to avoid, minimize, or mitigate them.

Paul Sponholz, P.E. | County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 |M: (507) 475-2253| Paul.Sponholz@SteeleCountyMN.gov

Comment #204

ESC EAW Comments #4

Re: Environmental Assessment Worksheet (EAW) – Systemic Denial of Data Access and Failure of Meaningful Public Participation

This comment is submitted on behalf of impacted residents regarding the Environmental Assessment Worksheet (EAW) for the East Side Corridor (ESC). Residents submit this comment to object to the adequacy of the EAW due to the ongoing denial of meaningful access to public data necessary for informed participation.

For years, residents have requested project-related public data needed to understand decisions regarding the ESC, including traffic, noise, environmental, and engineering information. These requests have been repeatedly delayed, restricted, or denied. As a result, multiple residents lack meaningful access to the information required to review and comment on the EAW which also is lacking this information. *See Exhibit A.*

While the County retained possession of public data provided for inspection, more than 1,800 records disappeared. Additionally, the County removed the basic software necessary to access the data in its native format. These actions have prevented residents from reviewing, analyzing, and verifying the information underlying the EAW.

These data access failures are not speculative. They were formally adjudicated in a contested case in which residents, proceeding pro se, substantially prevailed. The Administrative Law Judge found that the County violated the Minnesota Government Data Practices Act, imposed the maximum civil penalty, and ordered compliance. The Judge expressly recognized that the County's actions prevented meaningful public participation.

Despite this confirmed failure—and without restoring meaningful data access—the County opened and proceeded with the EAW public comment period. This deprived resident of the ability to engage in early and continuous participation as required by MEPA and NEPA.

An environmental review process that proceeds while the public lacks access to essential project data cannot satisfy statutory participation requirements. Public participation must be meaningful, informed, and supported by timely access to information. Proceeding otherwise undermines the credibility and legality of the environmental review.

In addition, the EAW omits or fails to disclose key information residents have long requested, including noise-related analyses, floodplain-impacts, and farmland impacts. The continued withholding or omission of material information constitutes suppression of information and further violates MEPA and NEPA disclosure obligations.

Because residents were denied meaningful access to public data and the opportunity for informed participation, the EAW is procedurally deficient and cannot support any environmental determination. Full restoration of access to all project-related public data in usable, native formats must occur, with adequate time for review, before reliance on the EAW.

WSB's proposal further committed to a detailed and focused public involvement process specifically tailored to property owners and other directly affected stakeholders. WSB represented that it would conduct early introductory meetings, provide consistent communication throughout the project, facilitate focused one-on-one outreach with impacted property owners, present preliminary designs, document meetings, and develop a living Public Involvement Plan to guide outreach, incorporate viable public comments into project design, and build consensus among stakeholders.

The environmental record demonstrates that these commitments were not fulfilled. Impacted property owners were not provided early or consistent access to preliminary designs, supporting analyses, or environmental data. In fact, the EAW is still missing this data. Meeting documentation and outreach records referenced in the consultant's proposal are absent from the public record. Rather than a living Public Involvement Plan that incorporated viable public comments, residents were repeatedly denied access to foundational project information and excluded from meaningful participation during critical decision points.

A public involvement process designed to "build trust and acceptance" cannot exist where property owners lack access to data, alternatives are dismissed without documentation, and public input cannot be informed or incorporated. The failure to implement the consultant's own promised engagement framework further undermines the adequacy and credibility of the EAW and violates MEPA and NEPA requirements for early and continuous public participation.

For the reasons stated above, residents request that the Responsible Governmental Unit refrain from relying on the current Environmental Assessment Worksheet for any environmental determination. The EAW must be revised or supplemented to restore meaningful public participation, including full access to all project-related public data in usable, native formats, disclosure of omitted environmental analyses, and sufficient time for public review and comment after access is restored. Proceeding without these corrective actions would violate MEPA and NEPA and render any environmental determination legally infirm.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

ESC EAW Comments #4

Exhibit A

Summary of Public Data Requests Relevant to Environmental Review and the East Side Corridor (ESC)

The following is a chronological summary of representative public data requests submitted by residents to Steele County and the City of Owatonna seeking information necessary to evaluate the environmental, procedural, and fiscal impacts of the East Side Corridor (ESC). These requests were submitted prior to and during the EAW process. Access to the requested data was denied, delayed, incomplete, or provided in unusable form, preventing meaningful public participation.

January 10, 2024 – (County)

Request:
Supporting documents, studies, and any tabletop exercise documentation underlying the assertion that **34th Avenue was "too far" and would not be used**, including any studies that involved or considered residents on the east side of Owatonna.
Purpose:
To evaluate the factual basis for the early dismissal of a reasonable alternative alignment and to determine whether alternatives analysis relied on documented studies, resident input, or unsupported assumptions—information directly relevant to environmental review and compliance with MEPA and NEPA alternatives requirements.
Status:
No supporting documentation provided; basis for rejection of the 34th Avenue alternative not substantiated in the public record.

October 25, 2024 (County) / January 21, 2025 (City)

Request:
All email correspondence since 2019 related to the ESC, 29th Ave, East Beltline study, and east-side infrastructure, involving county commissioners, county staff, city council members, city staff, third parties (including WSB), and members of the public.
Additionally, all documents, studies, and information related to the ESC and east-side infrastructure not available on the public-facing project website, including materials used to determine purpose and need and documents related to commercial development in the study area.
Purpose:
To evaluate project origins, purpose and need justification, consultant influence, coordination between agencies, and information relied upon but not disclosed in the environmental record.

ESC EAW Comments #4

Status:
Access delayed, incomplete, or not provided in usable form – County / Incomplete – City.

January 13, 2025 (County)

Request:
Professional engineering service proposals for the ESC referenced in the December 14, 2021 County Board meeting packet, which were missing from publicly available materials.
Purpose:
To evaluate consultant selection, scope of work, and the basis for environmental analyses relied upon during project development.
Status:
Completed; Improperly Charged

March 31, 2025 (County – Resubmitted April 2, 2025)
April 3, 2025 (City – Resubmitted April 18, 2025)

Request:
Records related to the Joint Transportation Committee, including its creation, authority, purpose, membership, bylaws or procedures, meeting schedules, attendance, projects, financial impacts, charter documents, agendas, minutes, and related files.
Purpose:
To understand project governance, decision-making authority, oversight structure, and the role of this committee in advancing the ESC.
Status:
Improperly denied.
The Administrative Law Judge later ruled the denial was unlawful and confirmed the request format was valid.

April 2, 2025 (County)

Request:
All noise studies conducted for the ESC initiated on or after January 1, 2020, including draft and final reports, modeling data, analyses, and supporting materials.
Purpose:
To evaluate noise impacts, compliance with state and federal noise standards, and mitigation feasibility—information required for environmental review.

Status:
Improperly denied; noise studies and impacts omitted from the EAW.

April 9, 2025 (County) / June 9, 2025 (City)

Request:
All information relating to the transfer of federal funds from the ESC to the Main Street Project, including correspondence, records, and communications involving county staff, city staff, elected officials, consultants, and ATP representatives.
Purpose:
To assess funding decisions, project segmentation, and impacts on environmental review and project justification.
Status:
Not provided.

May 6, 2025 (County and City)

Request:
All correspondence and records between the City of Owatonna and township officials regarding the ESC or related annexation matters (January 1, 2021–present), including objections, approvals, annexation discussions, and meeting documentation.
Purpose:
To evaluate consistency and completeness of intergovernmental coordination reflected in the environmental record.
Status:
Not Started from County / In-Progress with City

May 6, 2025 – Steele County Administration Center

Request:
Steele County's current **Code of Conduct**, **Code of Ethics**, and **Conflict of Interest Policy** applicable to elected officials, employees, board members, and appointed representatives.
Purpose:
To evaluate governance standards, ethical requirements, and conflict-of-interest safeguards applicable to officials and staff involved in decisions affecting the East Side Corridor, including consultant selection, funding transfers, and alignment decisions reflected in the environmental

record.
Status:
Completed after 147 days.

May 29, 2025 (County)

Request:
Traffic studies, reports, and raw traffic count data for Shady Avenue and Crestview Lane NE, with emphasis on truck traffic volumes; ESC traffic modeling or projections estimating diversion or reduction of truck traffic on these roads; or documentation showing whether these roads were considered in ESC modeling.
Purpose:
To evaluate traffic assumptions, safety impacts, and claimed benefits of the ESC relied upon in the EAW.
Status:
No data exists.

June 9, 2025 (City)

Request:
Development agreements, TIF documents, and MOUs (2019–2025) involving properties or infrastructure east of Cedar Avenue and within approximately two miles of the proposed 29th Ave ESC location, including communications with developers and agencies referencing the ESC.
Purpose:
To evaluate land use assumptions, growth inducement, connected actions, and potential predetermination of alignment.
Status:
Not provided.

July 1, 2025 (County) / July 21, 2025 (City)

Request:
Owatonna High School Traffic Impact Study, including all appendices, traffic counts, maps, figures, tables, technical analyses, and supporting documents.
Purpose:
To evaluate traffic assumptions, cumulative impacts, and reliance on prior studies relevant to

ESC planning.
Status:
Completed.

July 1, 2025 (County) / July 21, 2025 (City)

Request:
Steele County Roadway Safety Plan (August 2012), including all appendices, maps, tables, and technical supplements.
Purpose:
To evaluate roadway safety assumptions and planning standards referenced in ESC-related studies.
Status:
Completed - County./ Not provided - City

July 21, 2025 (City)

Request:
Records related to City acquisition of parcels around 2018 potentially tied to the ESC, including purchase agreements, deeds, council minutes, staff reports, communications, and planning discussions (2016–2021).
Purpose:
To assess corridor preservation, land acquisition, and potential predetermination prior to environmental review.
Status:
In progress.

July 21, 2025 (City)

Request:
City Council resolutions (circa 2004) related to preservation or mapping of a future transportation corridor east of Owatonna, associated meeting minutes, attachments, and follow-up communications (2000–2020).
Purpose:
To evaluate historical corridor planning and consistency with current environmental review.
Status:
No Data Exists.

Summary

These representative requests demonstrate sustained and repeated efforts by residents to obtain information necessary to evaluate the environmental, procedural, and fiscal impacts of the East Side Corridor. The denial, delay, and inaccessibility of this data—both before and during the EAW process—prevented meaningful public participation and contributed to an incomplete and misleading environmental record.

Comment #205

ESC EAW Comments #41

Comment on Inadequate Public Engagement, Misrepresentation, and Predetermination

Impacted residents met with City and County engineering staff on **May 26, 2023** to discuss the proposed project and its impacts on adjacent neighborhoods. During this meeting, residents raised concerns regarding safety, traffic volumes, truck traffic, and noise impacts associated with a roadway proposed approximately **17 feet from existing homes**.

At that meeting, residents were told by engineering staff that **protecting children was not the County's responsibility but the responsibility of parents**, despite the proximity of the proposed roadway to homes and residential areas. This statement is inconsistent with the County's obligations under transportation planning, safety design standards, and environmental review, which require consideration of public safety impacts, including impacts to residential areas.

Residents were also provided traffic information, including an estimate that **truck traffic would constitute approximately 15% of total traffic volumes**. When residents later referenced this figure in subsequent discussions, the stated truck percentage **changed multiple times**, and residents were **ridiculed for repeating figures originally provided by engineering staff**. This undermines confidence in the accuracy and reliability of the traffic data presented to the public and raises concerns about whether traffic impacts have been consistently and transparently disclosed.

Noise impacts were also raised by residents during the May 26, 2023 meeting. In response, the County Engineer stated words to the effect of: **"Are you talking about a noise wall? You don't want a noise wall. Noise walls are for major roads like I-35 and Highway 14."** This statement discouraged discussion of mitigation measures and minimized residential noise concerns, despite the proposed roadway's close proximity to homes and the applicability of noise analysis and mitigation requirements under state and federal guidance.

At the May 26, 2023 meeting, residents were explicitly told that **all alternatives were still under consideration**. However, just **five days later**, on **May 31, 2023**, the public open house presented the project with a **single preferred alternative**. This sequence strongly suggests that a preferred alternative had already been selected prior to meaningful public engagement, contradicting representations made to residents and undermining the integrity of the environmental review process.

Taken together, these actions demonstrate a pattern of **inadequate public engagement, inconsistent or shifting impact information, discouragement of mitigation discussion, and apparent predetermination of the project alignment**. As presented, the EAW does not provide a transparent or complete account of these interactions or their implications. This omission deprives the public and decision-makers of critical context necessary to evaluate whether the environmental review process has complied with MEPA's requirements for early, meaningful, and good-faith public participation.

For these reasons, the EAW is incomplete, and the record supports the need for a more comprehensive environmental review that fully examines safety, noise, traffic, and residential impacts, as well as the decision-making process itself. The RGU should prepare an EIS with full public engagement.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #206

ESC EAW Comments #1

Subject: Early and Continuous Public Participation Omitted from the Environmental Record

Impacted residents provided **early and continuous public input** throughout the planning of the East Side Corridor project. Residents attended **all publicly noticed open houses** and, when concerns were not addressed at the staff level, participated in **City Council and County Board meetings** at which public comment was allowed.

Residents consistently raised substantive concerns, including alignment selection, alternatives analysis, proximity to homes, safety, noise impacts, flooding, land-use assumptions, and procedural compliance. This input was provided repeatedly, on the record, and over multiple years.

The Environmental Assessment Worksheet does not acknowledge or incorporate this documented record of resident participation and public comment. Attached as **Exhibit A** is a list of public meeting recordings in which impacted residents provided public comment regarding the project. The omission of this record misrepresents the timing, frequency, and substance of public input and undermines the transparency of the environmental review process.

As a result, the EAW fails to address multiple substantive concerns that residents raised early and repeatedly. These concerns remain valid and unresolved. An environmental review that omits documented public participation and does not meaningfully respond to recurring, substantive issues cannot support a finding of no significant impact and warrants further environmental review.

This comment incorporates **Exhibit A** by reference.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Exhibit A

Title	URL
2025 11 25 County Commissioner Meeting Made with Clipchamp	https://www.youtube.com/watch?v=vbYFqHnXcN8&t=1s
2025 12 16 County Commissioner Meeting	https://www.youtube.com/watch?v=aPgyVC8cRlw&t=1s
2025 10 28 County Commissioner Meeting	https://www.youtube.com/watch?v=PNnmLMbuBpk&t=9s
2025 12 02 City Council Meeting	https://www.youtube.com/watch?v=5QCNVAZYS5U&t=1s
2025 10 14 County Commissioner Meeting	https://www.youtube.com/watch?v=AUaE7NouUsI&pp=0gcJCTwKAYcqIYzv
2025 11 13 County Commissioner Meeting	https://www.youtube.com/watch?v=XYeHSLILIqE
2025 11 18 City Council Meeting - Levy Discussion	https://www.youtube.com/watch?v=GGjmYZTWxe8
2025 12 16 - City Council Work Session	https://www.youtube.com/watch?v=c0qcP04T1gg
2025 12 16 City Council Meeting	https://www.youtube.com/watch?v=BnxjqBn5vOM&t=7s
2025 11 05 City Council Study Session	https://www.youtube.com/watch?v=xJEYAjUzEJ8
2025 10 21 City Council Meeting	https://www.youtube.com/watch?v=ubQB7ZvT6v0
2025 10 07 City Council Meeting	https://www.youtube.com/watch?v=8wYstOTAWJs&t=109s
2024 10 07 City Council Study Session	https://www.youtube.com/watch?v=FpFdu049I8M
2025 11 05 City Council Meeting	https://www.youtube.com/watch?v=PojdUg0rArs
December 4, 2025 Steele County Truth in Taxation Meeting	https://www.youtube.com/watch?v=Wzy08pNhBBg&t=4852s
2025 09 09 County Commissioner Meeting	https://www.youtube.com/watch?v=xm0V2NEvhdY
2025 08 12 County Commissioner Meeting	https://www.youtube.com/watch?v=7c5IbbrYFtM&t=12s
2025 09 02 City Council Meeting	https://www.youtube.com/watch?v=kalclhTBREo
2025 09 02 Work Study Session	https://www.youtube.com/watch?v=0xYMgvRQjzM
2025 09 16 City Council Meeting	https://www.youtube.com/watch?v=iDQUdtlyICk&t=7s
2025 09 23 Steele County Commissioner Meeting	https://www.youtube.com/watch?v=SxOuKxi_U_w&t=6s
September 16, 2025 Work Study Session	https://www.youtube.com/watch?v=6pSQPNWC0U8&t=5s
2025 08 26 Steele County Commissioner Meeting	https://www.youtube.com/watch?v=C45ChdZLBDs&t=27s
2025 08 19 City Council Meeting	https://www.youtube.com/watch?v=UTG6fHYwY90&t=6s
2025 08 06	https://www.youtube.com/watch?v=U2LLigesfuE&t=3749s
2025 07 22 County Commissioner Meeting	https://www.youtube.com/watch?v=GnM2V45_NEs&t=14s
2020 07 15 City Council Meeting	https://www.youtube.com/watch?v=5Q-2E4JX1Y8&t=2646s
City of Owatonna Truth in Taxation - December 2, 2025	https://www.youtube.com/watch?v=hU1vyzoaNRQ&t=16s
Safety Center - West Hills Commission 11/17/2025	https://www.youtube.com/watch?v=7sJuWbWtM9k&t=45s
Campaign Promises vs Reality	https://www.youtube.com/watch?v=hSYVP-FmEVE
2025 08 06 City Council Mtg	https://www.youtube.com/watch?v=6mgXCGq679E
2025 07 15 City Council Meeting	https://www.youtube.com/watch?v=UQbqgop_hyk&t=1s
2025 07 08 County Commissioner Meeting	https://www.youtube.com/watch?v=4-7gaVj3vNw
2025 06 24 County Meeting Enhanced Sound Made with Clipchamp	https://www.youtube.com/watch?v=CESIPRlqsHU

Exhibit A

2025 06 17 City Council Meeting	https://www.youtube.com/watch?v=566RXumRZF4&t=1s
2025 06 03 City Council Meeting	https://www.youtube.com/watch?v=Ge8nkdBzjuA
2025 06 10 County Commissioner Meeting	https://www.youtube.com/watch?v=rppJy2DDHaQ&t=918s
Residents Silenced as County Pushes $8M in Projects Before Engineer Quits | May 29, 2025	https://www.youtube.com/watch?v=_cbAoRVYVkA&t=1598s
2025 05 20 City Council Meeting	https://www.youtube.com/watch?v=pm4pwLZXKNg&t=5s
2025 05 06 City Council Meeting - The Silence Was Loud	https://www.youtube.com/watch?v=c9eErmWX4xo&t=4s
2025 04 22 Steele County Board Meeting	https://www.youtube.com/watch?v=ZUCdmhXRt_I&t=3s
ðŸ“‰ "2 Seconds Saved" â€” Owatonnaâ€™s $30M ESC Plan Sparks Backlash	https://www.youtube.com/watch?v=8sTna7iVvU0
22-May-25	https://www.youtube.com/watch?v=y8vxHzLT0Fk
Engineer Resignsâ€”Steele County Still Hands Him $2M in Project Contracts - May 13 2025	https://www.youtube.com/watch?v=2vvBTypBHxs&t=4867s
2025 04 08 County Commissioner Meeting	https://www.youtube.com/watch?v=_uL4eX3shZQ
2025 03 25 Steele County Commissioner Meeting	https://www.youtube.com/watch?v=r2jcf-EYzoQ&t=4s
2025 02 25 County Commissioner Meeting	https://www.youtube.com/watch?v=dYiZwAV3iPY&t=2s
2025 02 11 County Commissioner Meeting	https://www.youtube.com/watch?v=TmV6WG-McVc&t=21s
2025 01 28 County Commissioners Meeting	https://www.youtube.com/watch?v=VWBOj24pFvQ&t=1s&pp=0gcJCTwKAYcqIYzv
2025 04 15 City Council	https://www.youtube.com/watch?v=cqFYeZi6lzc&t=6s
2025 04 01 Owatonna City Council Meeting | ESC Funds Quietly Moved Without Public Input	https://www.youtube.com/watch?v=vh8e4X7KXwo&t=1s
2025 03 18 City Council Meeting	https://www.youtube.com/watch?v=V02aGjVkjWk&t=59s
2025 03 04 City Council Meeting	https://www.youtube.com/watch?v=XhubvNJCiaY&t=4s
2025 02 18 City Council Meeting	https://www.youtube.com/watch?v=j7El3pei4cc&t=7s
2025 02 04 City Council Meeting	https://www.youtube.com/watch?v=JnVwwRzP8SY&t=2s
2025 01 21 City Council Meeting	https://www.youtube.com/watch?v=3guNnBvVfE0&t=4s
2025 01 07 County Commissioner Meeting	https://www.youtube.com/watch?v=bqjSgo9GMh0&t=4s
2025 01 07 City Council Meeting	https://www.youtube.com/watch?v=K6mtvqNGYs4&t=1s
2024 12 17 City Council Meeting	https://www.youtube.com/watch?v=vLSzx7h6S0s&t=7s
2024 12 3 City Council Meeting	https://www.youtube.com/watch?v=_NFt5OuO7JI&t=4s
2024 11 19 City Council Meeting	https://www.youtube.com/watch?v=dAZ1LSKVh3Q
2024 11 06 City Council Meeting	https://www.youtube.com/watch?v=PFBgOp1KTVY&t=1s
2024 10 15 City Council Meeting	https://www.youtube.com/watch?v=OvGeMVx8OvY&t=7s
2024 10 01 City Council Meeting	https://www.youtube.com/watch?v=Vjj7sCnTp4s
2024 12 19 County Commissioner Meeting	https://www.youtube.com/watch?v=3F-W1p-9OEo&t=3s
2024 12 12 County Commissoner Meeting	https://www.youtube.com/watch?v=sx2gWO2qLPg&t=644s
2024 11 26 County Commissioner Meeting	https://www.youtube.com/watch?v=-w_nyqHYdD4&t=2s

Exhibit A

2024 11 12 County Commissioner Meeting	https://www.youtube.com/watch?v=kP9PW0YGxxc
2024 10 22 County Commissioner Meeting	https://www.youtube.com/watch?v=q6NymTJ5kJU&t=212s
2024 10 01 City Council Meeting	https://www.youtube.com/watch?v=7OPa0xQZjrQ&t=3s
2024 09 17 City Council Meeting	https://www.youtube.com/watch?v=9DSMfLMlezE
2024 09 03 City Council Meeting	https://www.youtube.com/watch?v=Zfowfr8B1io
2024 08 20 City Council Meeting	https://www.youtube.com/watch?v=cP87hiaNI1E&t=3s
2024 08 07 City Council Meeting	https://www.youtube.com/watch?v=SbwRcKyemsE&t=34s
2024 07 16 City Council Meeting	https://www.youtube.com/watch?v=itG2Bj3T-BQ
2024 07 02 City Council Meeting	https://www.youtube.com/watch?v=1SOEfq3WxuE
2024 09 24 County Commissioner Meeting Full	https://www.youtube.com/watch?v=SY3evlWPoXE&t=55s
2024 09 10 County Commissioner Meeting	https://www.youtube.com/watch?v=JjSZM2bYQvg
2024 08 13 County Commissioner Meeting	https://www.youtube.com/watch?v=xp6tThc9c9g&t=90s
2024 08 27 County Commissioner Meeting	https://www.youtube.com/watch?v=k0_NLWtWmQE&t=208s
2024 07 23 County Commissioner Meeting	https://www.youtube.com/watch?v=MDci-LCA0SA
2024 07 09 County Commissioner Meeting	https://www.youtube.com/watch?v=zZo2hGnN3fo&t=9s
2024 06 25 County Commissioner Meeting	https://www.youtube.com/watch?v=UdDZ-Ep_R0g&t=119s
17 Feet	https://www.youtube.com/watch?v=CNeqteI7Zmw
Additional Projects With ESC	https://www.youtube.com/watch?v=Wqu1UUPPdcc&t=20s
WSB presentation of ESC to City Council	https://www.youtube.com/watch?v=9t9x0eKq3z8&pp=0gcJCTwKAYcqIYzv
WSB Presentation of the ESC for County Commissioners	https://www.youtube.com/watch?v=hvH6FIRzFiQ
Imagine Owatonna Presentation	https://www.youtube.com/watch?v=uM16IRMYM7Y
2024 06 04 City Council Meeting	https://www.youtube.com/watch?v=69yBE7WBUFE
2024 06 18 City Council Meeting	https://www.youtube.com/watch?v=HT0PlJqRAAg
2024 05 21 City Council Meeting	https://www.youtube.com/watch?v=xkYIwI7ElV8
2024 05 07 City Council Meeting	https://www.youtube.com/watch?v=thNCdO0ssgo
2024 04 16 City Council Meeting	https://www.youtube.com/watch?v=LPruk1mhZ6w
2024 06 11 County Commissioner Meeting	https://www.youtube.com/watch?v=IRlCvI-iBUk&t=6s&pp=0gcJCTwKAYcqIYzv
2024 05 28 County Commissioner Meeting	https://www.youtube.com/watch?v=IMTROeNBX7M
2024 05 14 County Commissioner Meeting	https://www.youtube.com/watch?v=Xs10Ad5O0xk
2024 04 23 County Commisioner Meeting	https://www.youtube.com/watch?v=EcD12va1XHc
2024 04 09 County Commissioner Meeting	https://www.youtube.com/watch?v=O-9m5j9hUkQ
2024 03 26 County Commissioner Meeting	https://www.youtube.com/watch?v=ZsnUIHs36M4
2024 03 12 County Commissioner Meeting	https://www.youtube.com/watch?v=nZZJnVC6FxY
2024 02 27 County Commissioner Meeting	https://www.youtube.com/watch?v=QHvKop_RP3w
2024 04 02 City Council Meeting	https://www.youtube.com/watch?v=yLaXseHWloM&t=2s
2024 03 19 City Council Meeting	https://www.youtube.com/watch?v=PhOTkYt7R2U
2024 03 6 City Council Meeting	https://www.youtube.com/watch?v=fPSgig4NkIU&t=3s

Exhibit A

Stop the Proposed Highway Project in Owatonna: Protect Our Homes and Communities	https://www.youtube.com/watch?v=l70P2lkucuI
Who encroached on what?! 26th St or Residents?	https://www.youtube.com/watch?v=06duEJJhoWc&t=6s
2024 02 20 City Council Meeting	https://www.youtube.com/watch?v=14IE9UBJP94&t=6s&pp=0gcJCTwKAYcqIYzv
2024 02 13 County Commissioner Meeting	https://www.youtube.com/watch?v=ov7K67CGcwg
2024 02 06 City Council Meeting	https://www.youtube.com/watch?v=ZmO-k_S3TqA&t=1s
2024 01 23 County Commissioner Meeting	https://www.youtube.com/watch?v=A21mf0yuHgI&t=2s
2024 01 16 City Council Meeting	https://www.youtube.com/watch?v=crmhecuegT0
2024 01 02 County Commissioner	https://www.youtube.com/watch?v=oaPu5vANAPU&t=100s
2024 01 02 City Council Meeting	https://www.youtube.com/watch?v=kLHYb2UqvK0
2023 12 26 County Commissioner Meeting	https://www.youtube.com/watch?v=tHQPJYHJnTI
2023 12 12 County Commissioner and Levy Meeting	https://www.youtube.com/watch?v=qpqhTCJgl3M
2023 11 28 County Commissioner Meeting	https://www.youtube.com/watch?v=ANaxmdF0O4k&t=1s&pp=0gcJCTwKAYcqIYzv
2023 12 19 City Council Meeting	https://www.youtube.com/watch?v=OH1nYxPxAC0&t=11s
2023 12 05 City Council Meeting	https://www.youtube.com/watch?v=6hwJA7dXJew&t=2285s
2023 11 21 City Council Meeting	https://www.youtube.com/watch?v=6mVkZke84B4&t=4s
2023 11 07 City Council Meeting	https://www.youtube.com/watch?v=2q5w2uprhuQ&t=74s
Straight Talk Spotlight Matt Sennott Speaks about the East Side Corridor	https://www.youtube.com/watch?v=QpBGBaWNPMY
2023 10 17 City Council Meeting	https://www.youtube.com/watch?v=DQVGZYVs4lU
2023 10 03 City Council Meeting	https://www.youtube.com/watch?v=j2WpKloU6uY&t=324s&pp=0gcJCTwKAYcqIYzv
2023 09 19 City Council Meeting	https://www.youtube.com/watch?v=_6n6YPPns8o
2023 09 05 City Council Meeting	https://www.youtube.com/watch?v=2h5B8NmFqmc&t=76s
2023 08 15 City Council Meeting	https://www.youtube.com/watch?v=yAZg9yGzwCE&t=15s
November 14, 2023 Steele County 2024 Transportation Public Hearing	https://www.youtube.com/watch?v=jb5S2Q3H-ZU
2023 11 14 County Public Hearing	https://www.youtube.com/watch?v=9dZ0J3GfXKQ&t=2058s&pp=0gcJCTwKAYcqIYzv
2023 10 24 County Commissioner Meeting	https://www.youtube.com/watch?v=_USUH3uFoFc&t=5s
2023 10 10 County Commissioner Meeting	https://www.youtube.com/watch?v=GZlAUEE5MQk&t=1s
2023 09 26 County Commissioner Meeting	https://www.youtube.com/watch?v=1Ek3ARggQ6U
2023 09 12 County Commissioner Meeting	https://www.youtube.com/watch?v=RoHMwEmRSGA
2023 08 22 County Commissioner Meeting	https://www.youtube.com/watch?v=OJPI639v_bw&t=3s
2023 08 08 County Commissioner Meeting	https://www.youtube.com/watch?v=Hdogiqmd47g
2023 07 25 County Commissioner Meeting	https://www.youtube.com/watch?v=i_I97MZzfYQ&t=236s
2023 07 11 County Commissioner Meeting	https://www.youtube.com/watch?v=40HvFpeaUWA&t=3s
2023 06 27 County Commissioner Meeting	https://www.youtube.com/watch?v=BlYpH8_0gzE&pp=0gcJCTwKAYcqIYzv
2023 06 13 County Commissioner Meeting	https://www.youtube.com/watch?v=iZGAL6EZTm0

Comment #207

ESC EAW Comments #39

ENVIRONMENTAL JUSTICE & CUMULATIVE IMPACTS

Cumulative Impacts and Environmental Justice Concerns Resulting from Withheld Alternatives and Suppressed Impact Data

Residents submit this comment to document cumulative and disproportionate impacts resulting from the systematic withholding of avoidance alternatives, noise mitigation information, subdivision connection decisions, and noise studies during the environmental review for the East Side Corridor (ESC).

Cumulative and Disproportionate Harm

Project records show that known impacts—including residential noise, loss of use and enjoyment of property, degradation of neighborhood cohesion, and life altering health risks—were foreseeable, avoidable, and communicated to elected officials. However, a reasonable avoidance alternative, noise mitigation feasibility, and related impact data were withheld from public disclosure while decisions continued to advance. These actions compounded harm by denying affected residents the opportunity to understand, respond to, or protect themselves from known impacts, despite constant requests to be included.

The cumulative effect of suppressing avoidance options, conditioning mitigation on voting outcomes, denying meaningful public participation, and withholding noise studies during the comment period created significant fear, stress, and loss of trust among impacted residents, resulting in a chilling effect on protected participation. These harms were not speculative; they flowed directly from secrecy and exclusion during critical decision-making stages.

Environmental Justice Implications

The impacts of this process disproportionately burden residents of the North Country neighborhood, where homes exist on or immediately adjacent to the proposed alignment. Decisions affecting noise exposure, displacement risk, and neighborhood cohesiveness were made without transparent disclosure, while alternatives that could have reduced or avoided those impacts were withheld.

The North Country immediate impact area includes a substantial concentration of residents with disabilities and serious medical conditions for whom noise impacts are known to be particularly harmful. Based on direct knowledge of the neighborhood, approximately 35% of households adjacent to the proposed corridor include one or more residents with disabilities or significant health conditions. Along the back lot line adjacent to the proposed alignment alone, at least seventeen individuals with disabilities or serious medical conditions reside, representing a significant portion of the residents most directly affected.

For these residents, increased traffic noise, vibration, and barrier effects are reasonably expected to exacerbate existing conditions, including heightened sensory sensitivity, increased

risk of confusion or disorientation, seizure triggers, heart attacks, mental health, and stress-related health impacts. These conditions and heightened sensitivities were communicated to elected officials during the decision-making process, making the potential for amplified harm foreseeable and requiring avoidance and mitigation during alternatives evaluation.

Environmental justice principles require that communities facing disproportionate impacts receive meaningful access to information and participation in decisions affecting their health and quality of life. That did not occur here.

Conclusion

The cumulative suppression of avoidance alternatives and impact data transformed procedural violations into real, lived harm. These impacts were foreseeable, preventable, and disproportionately borne by a specific residential community. Because these cumulative and environmental justice impacts were foreseeable, avoidable, and not adequately disclosed or analyzed, the record cannot support a Finding of No Significant Impact. Independent oversight and a full Environmental Impact Statement are necessary to evaluate cumulative impacts, environmental justice concerns, and avoidance alternatives in a transparent and lawful manner.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #208

ESC EAW Comments #24

Exclusion of the Public from the Joint Transportation Committee

The Environmental Assessment Worksheet fails to disclose or address the role of the Joint County/City Transportation Committee in shaping key decisions related to the East Side Corridor. Public records and internal correspondence demonstrate that this committee functioned as a deliberative forum where alignment selection, mitigation considerations, and funding strategy were discussed prior to public notice or formal action.

Despite its role, the Joint Transportation Committee does not publish meeting schedules, agendas, or minutes, and residents have been explicitly told that meetings are not open to the public. Requests for meeting records and schedules have been denied by Steele County, even though the committee is a formally constituted intergovernmental body referenced in board proceedings and internal emails.

The absence of public access to this committee has materially impaired public participation. Residents were unable to observe deliberations, understand how alternatives were evaluated, or respond to evolving positions on mitigation and federal funding, despite requesting access and data. Instead, outcomes were presented as foregone conclusions, limiting the effectiveness of later public comment opportunities.

MEPA requires early and often public participation, transparency, and good-faith public engagement before decisions are made, not after they are effectively settled. The use of closed or inaccessible committee meetings to develop consensus and direction for the East Side Corridor undermines the legitimacy of the environmental review, denies public participation, and constitutes predetermination.

To date, neither the county nor the city have provided any responsive data to this request and the county continues to unlawfully deny this request without fulfilling MGDA requirements.

Chilling of Public Participation Through Restrictive Communication Directives

Public participation was further impaired by directives that discouraged residents from engaging with County staff or seeking information through ordinary channels. In correspondence responding to requests for Joint Transportation Committee information, the County Attorney instructed that “from this point forward,” all requests for documents **and questions regarding the East Side Corridor** were to be directed only to the County Attorney and the County Administrator. This directive was not limited to formal data requests under Chapter 13 but extended broadly to any questions about the project, originating from a basic question regarding what should be a public committee.

Requiring residents to route all inquiries through legal counsel and executive administration has a foreseeable chilling effect on public participation. Reasonable members of the public may refrain from asking questions, seeking clarification, or engaging further out of concern that their participation will be monitored, delayed, or treated as adversarial. This is particularly true

where residents had already experienced hostility, denial of access to meetings, and repeated refusals to provide public information.

MEPA requires meaningful, good-faith public engagement throughout the environmental review process. Directives that restrict communication, deter inquiry, and concentrate control over information flow undermine transparency and substantially impair the public's ability to participate. This chilling effect further demonstrates that the environmental review process for the East Side Corridor was procedurally compromised.

Conclusion and Request for Environmental Impact Statement

This record demonstrates that the Environmental Assessment Worksheet for the East Side Corridor is affected by fatal procedural flaws that undermine the integrity of environmental review. Substantive decisions regarding alignment, mitigation, and funding were developed through closed and inaccessible committee meetings prior to and during the EAW process. The public was denied access to deliberations, schedules, minutes, and underlying data necessary to meaningfully participate, and lawful data requests were repeatedly denied despite clear evidence that such data exists and ALJ rulings that the data requests were valid and the county responded inappropriately.
(www.OwatonnaEastSideCorridor.com/downloads/FindindsofFactConclusionsofLawandORderCAH22-0305-40882.pdf pg. 22)

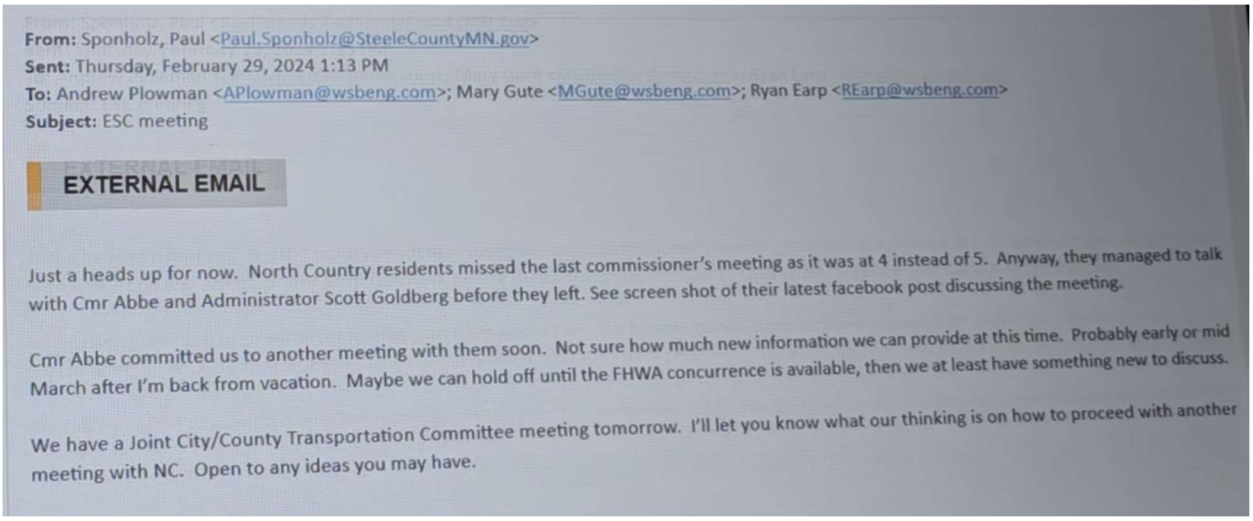
These actions constitute predetermination and substantially impair public participation in violation of MEPA's core requirements. Because these defects occurred before and during environmental review, they cannot be cured through revisions to the EAW or additional public comment. An Environmental Assessment Worksheet is therefore inadequate as a matter of law.

For these reasons, the Responsible Governmental Unit must require preparation of a full Environmental Impact Statement (EIS) for the East Side Corridor, conducted with transparent procedures and meaningful public involvement, before any further project decisions are made.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Availability of Records

Due to deletion, destruction, or loss of public data that was previously within the County's possession, official copies of certain records were not available for inspection or duplication. As a result, the best available evidence consists of screen captures from video recordings. Where portions of emails or documents are difficult to read, the visible content has been transcribed verbatim below the image to preserve accuracy and context.



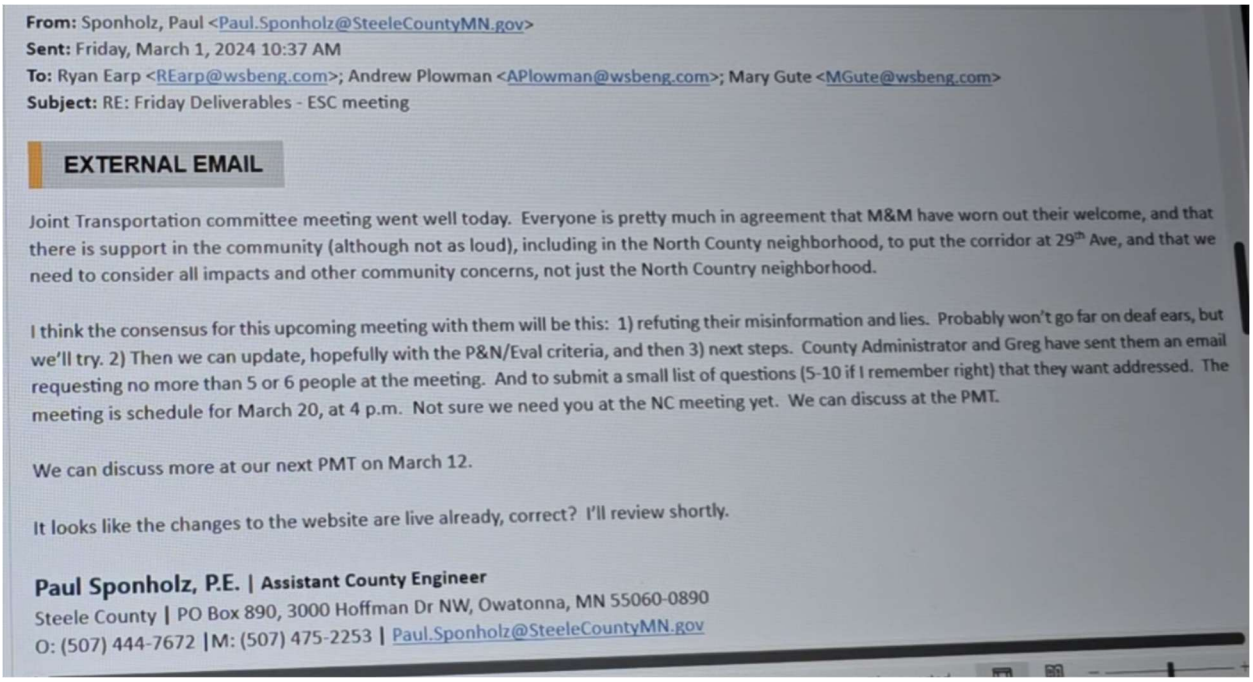
From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, February 29, 2024 1:13 PM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>; Ryan Earp <REarp@wsbeng.com>
Subject: ESC meeting

EXTERNAL EMAIL

Just a heads up for now. North Country residents missed the last commissioner's meeting as it was at 4 instead of 5. Anyway, they managed to talk with Cmr Abbe and Administrator Scott Goldberg before they left. See screen shot of their latest facebook post discussing the meeting.

Cmr Abbe committed us to another meeting with them soon. Not sure how much new information we can provide at this time. Probably early or mid March after I'm back from vacation. Maybe we can hold off until the FHWA concurrence is available, then we at least have something new to discuss.

We have a Joint City/County Transportation Committee meeting tomorrow. I'll let you know what our thinking is on how to proceed with another meeting with NC. Open to any ideas you may have.



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, March 1, 2024 10:37 AM
To: Ryan Earp <REarp@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Friday Deliverables - ESC meeting

EXTERNAL EMAIL

Joint Transportation committee meeting went well today. Everyone is pretty much in agreement that M&M have worn out their welcome, and that there is support in the community (although not as loud), including in the North County neighborhood, to put the corridor at 29th Ave, and that we need to consider all impacts and other community concerns, not just the North Country neighborhood.

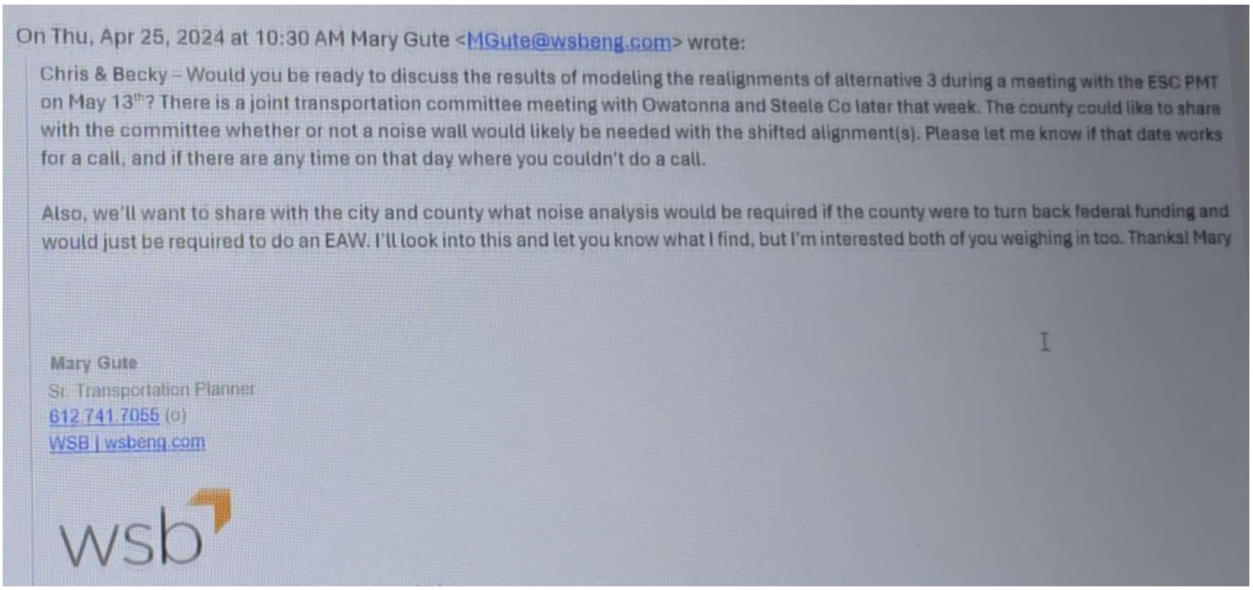
I think the consensus for this upcoming meeting with them will be this: 1) refuting their misinformation and lies. Probably won't go far on deaf ears, but we'll try. 2) Then we can update, hopefully with the P&N/Eval criteria, and then 3) next steps. County Administrator and Greg have sent them an email requesting no more than 5 or 6 people at the meeting. And to submit a small list of questions (5-10 if I remember right) that they want addressed. The meeting is schedule for March 20, at 4 p.m. Not sure we need you at the NC meeting yet. We can discuss at the PMT.

We can discuss more at our next PMT on March 12.

It looks like the changes to the website are live already, correct? I'll review shortly.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

ESC Advocate's names start with M.


On Thu, Apr 25, 2024 at 10:30 AM Mary Gute <MGute@wsbeng.com> wrote:

Chris & Becky – Would you be ready to discuss the results of modeling the realignments of alternative 3 during a meeting with the ESC PMT on May 13th? There is a joint transportation committee meeting with Owatonna and Steele Co later that week. The county could like to share with the committee whether or not a noise wall would likely be needed with the shifted alignment(s). Please let me know if that date works for a call, and if there are any time on that day where you couldn't do a call.

Also, we'll want to share with the city and county what noise analysis would be required if the county were to turn back federal funding and would just be required to do an EAW. I'll look into this and let you know what I find, but I'm interested both of you weighing in too. Thanks! Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

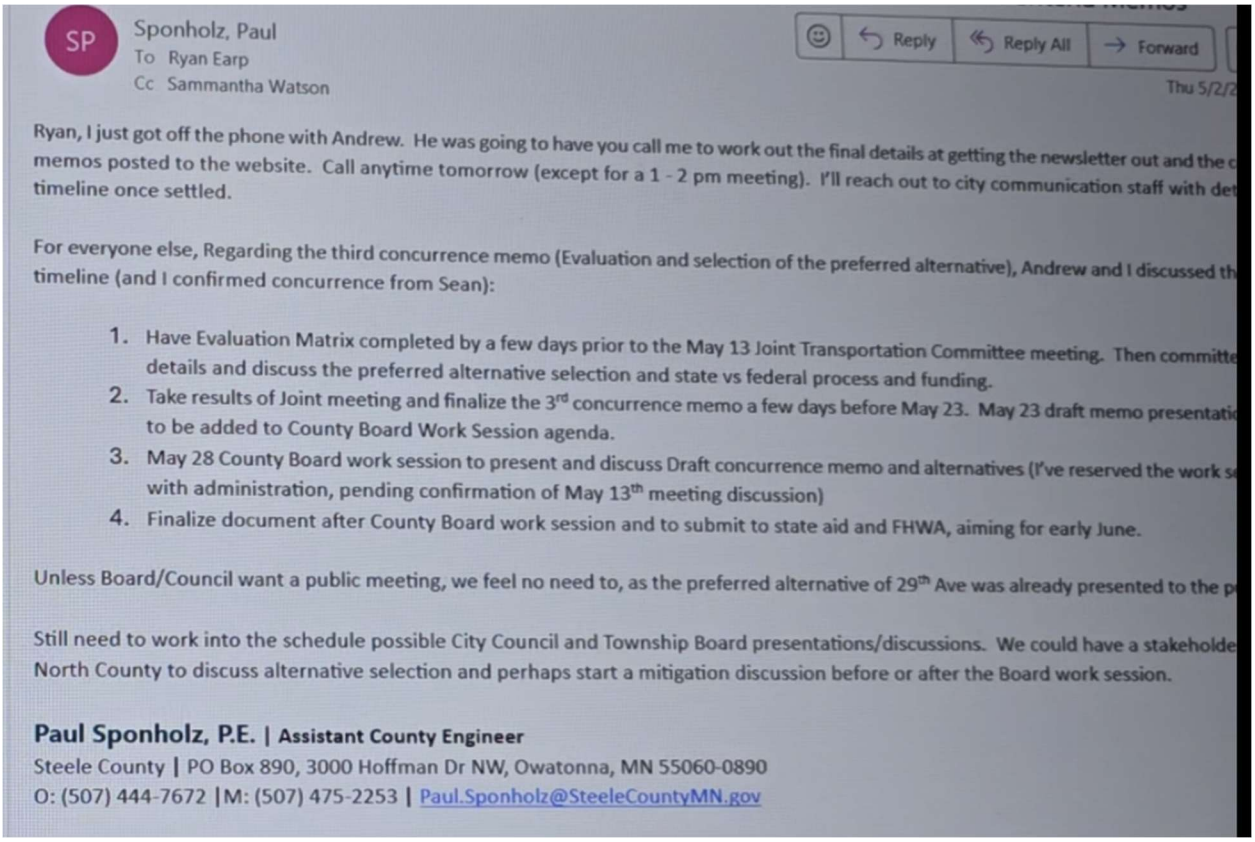
wsb

On Thu, April 25, 2024 at 10:30 AM Mary Gute <email> wrote:
Chris & Becky – Would you be ready to discuss the results of modeling the realignments of alternative 3 during a meeting with ESC PMT on May 13th? There is a joint transportation committee meeting with Owatonna and Steele Co late that week. The county could like to share with the committee whether or not a noise wall would likely be needed with the shifted alignment(s). Please let me know if that date works for a call, and if there are any time on that day where you couldn't do a call.

Also, we'll want to share with the city and county what noise analysis would be required if the county were to turn back federal funding and would just be required to do an EAW. I'll look into this and let you know what I find, but I'm interested both of you weighing in too. Thanks! Mary

Mary Gute
Sr. Transportation Planner

ESC EAW Comments #24



SP

Sponholz, Paul
To Ryan Earp
Cc Sammantha Watson

Reply | Reply All | Forward

Thu 5/2/2

Ryan, I just got off the phone with Andrew. He was going to have you call me to work out the final details at getting the newsletter out and the c memos posted to the website. Call anytime tomorrow (except for a 1 - 2 pm meeting). I'll reach out to city communication staff with det timeline once settled.

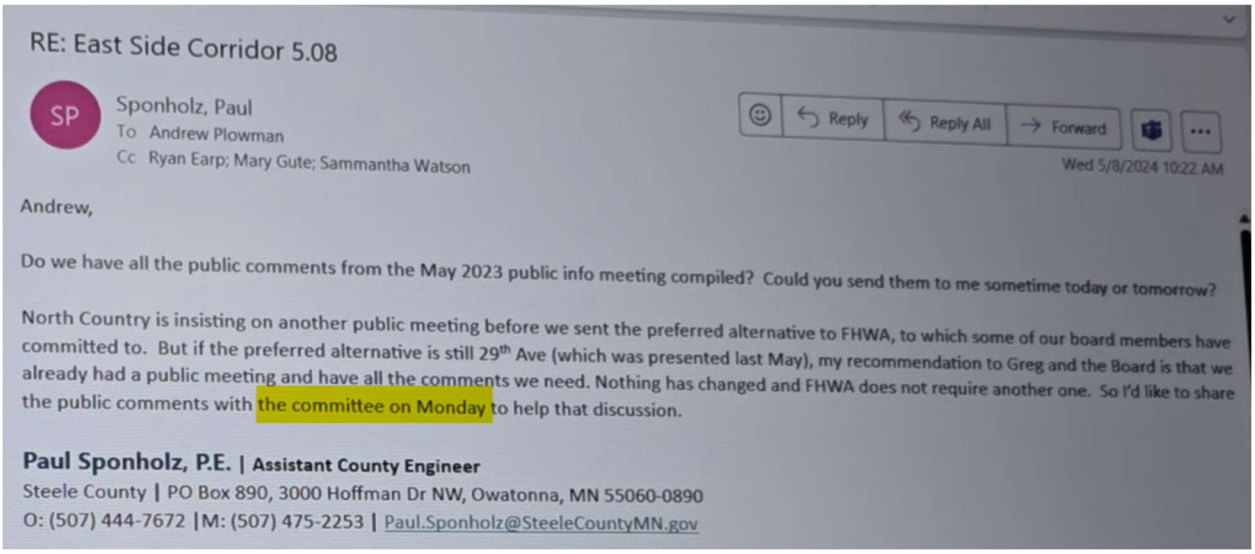
For everyone else, Regarding the third concurrence memo (Evaluation and selection of the preferred alternative), Andrew and I discussed th timeline (and I confirmed concurrence from Sean):

1. Have Evaluation Matrix completed by a few days prior to the May 13 Joint Transportation Committee meeting. Then committe details and discuss the preferred alternative selection and state vs federal process and funding.
2. Take results of Joint meeting and finalize the 3rd concurrence memo a few days before May 23. May 23 draft memo presentati to be added to County Board Work Session agenda.
3. May 28 County Board work session to present and discuss Draft concurrence memo and alternatives (I've reserved the work s with administration, pending confirmation of May 13th meeting discussion)
4. Finalize document after County Board work session and to submit to state aid and FHWA, aiming for early June.

Unless Board/Council want a public meeting, we feel no need to, as the preferred alternative of 29th Ave was already presented to the p

Still need to work into the schedule possible City Council and Township Board presentations/discussions. We could have a stakeholde North County to discuss alternative selection and perhaps start a mitigation discussion before or after the Board work session.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



RE: East Side Corridor 5.08

SP

Sponholz, Paul
To Andrew Plowman
Cc Ryan Earp; Mary Gute; Sammantha Watson

Reply | Reply All | Forward | ...

Wed 5/8/2024 10:22 AM

Andrew,

Do we have all the public comments from the May 2023 public info meeting compiled? Could you send them to me sometime today or tomorrow?

North Country is insisting on another public meeting before we sent the preferred alternative to FHWA, to which some of our board members have committed to. But if the preferred alternative is still 29th Ave (which was presented last May), my recommendation to Greg and the Board is that we already had a public meeting and have all the comments we need. Nothing has changed and FHWA does not require another one. So I'd like to share the public comments with the committee on Monday to help that discussion.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, May 9, 2024 7:04 PM
To: Andrew Plowman <APlowman@wsbeng.com>
Cc: Mary Gute <MGute@wsbeng.com>
Subject: Re: Matrix

We had our Public Works Committee today. Consensus was we are going to continue the federal process. Too many ramifications to walk away from it. But that doesn't consider the city's desire the keep the original 29th Ave corridor. One option talked about it to take the wall to a vote. We'll have to see what the consensus will be from the Joint Transportation Committee meeting Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 |paul.sponholz@steelecountymn.gov

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

EXTERNAL EMAIL

Would we do a vote before finalizing the concurrence memo and submitting to FHWA so that we can determine the final need for the wall? We aren't going to build a sound wall, but if the neighborhood votes against the wall, we can move forward with the original alignment.

Include the sound wall costs in the matrix for now and we can discuss with the Committee on Monday.

So far, the idea of abandoning federal funding isn't being well received. And with the uncertainty of federal requirements in permits, not something we'll likely pursue. We'll have a better feel of that idea on Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Tuesday, September 3, 2024 1:56 PM
To: Sean P. Murphy <Sean.Murphy@owatonna.gov>
Subject: FW: SP 074-070-009 Steele County East Side Corridor Evaluation of Alternatives Memo

Sean,

Its signed! I'll be in touch soon with next steps. Discussing with Greg and Renae hopefully soon. Then a public works committee Monday. Do we want a Joint Transportation meeting soon?

For now, no public notice or discussion please until we get everyone on board with the same message.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

Board/Commission Committee	Council Representation 2025
Economic Development Authority	Dave Burbank, Dan Boeke and Doug Voss
Housing Redevelopment Authority	Nate Dotson
Owatonna Area Business Development Center	Brent Svenby & Dan Boeke
Joint Powers Board – 911 Board	Dave Burbank and Nate Dotson
Joint County/City Transportation Committee	Council President & Vice-President: Kevin Raney & Doug Voss
City/OPU Joint Committee	Dan Boeke & Nate Dotson
City/County/School/OPU Joint Task Force	Council President & Vice-President: Kevin Raney & Doug Voss
Dog Hearing Panel	Dan Boeke, Doug Voss, Kevin Raney and Brent Svenby
Executive Committee	Council President, Vice-President and Council Member at Large: Kevin Raney, Doug Voss, and Dan Boeke
Facilities Steering Committee	Dan Boeke, Doug Voss, and Don McCann

2025 STEELE COUNTY BOARD COMMITTEE APPOINTMENTS (01/01/2025)

2025 Chair: James Brady 2025 Vice Chair: John Glynn

Internal / Policy Committees

Internal Central Services Committee
James Brady, Chair (Board Chair)
John Glynn, Member (Board Vice-Chair)
Joshua Prokopec, Alternate

Land Use/Records Committee
John Glynn, Chair
Jim Abbe, Member
James Brady, Alternate

Property & Maintenance Committee
Jim Abbe, Chair
James Brady, Member
Greg Krueger, Alternate

Public Safety & Health Committee
Joshua Prokopec, Chair
Greg Krueger, Member
Jim Abbe, Alternate

Public Works Committee
Greg Krueger, Chair
Joshua Prokopec, Member
John Glynn, Alternate

Board of Equalization
All Commissioners

Joint Powers, Advisory Board, Regional Representation

Alliance for Greater Equity
Greg Krueger, Member
Jim Abbe, Alternate

Cannon River 1W1P Joint Policy Committee
Joshua Prokopec, Member
James Brady, Alternate

Cannon River Watershed Joint Powers Board
Joshua Prokopec, Member
James Brady, Alternate

Children's Mental Health Collaborative
James Brady, Member
Greg Krueger, Member
Jim Abbe, Alternate

Community Corrections Advisory Board
John Glynn, Member
Greg Krueger, Alternate

Community Health Board (Dodge/Steele)
John Glynn, Member
Jim Abbe, Member
Greg Krueger, Member
Joshua Prokopec, Alternate

Counties Providing Technology
Jim Abbe, Delegate
John Glynn, Alternate

Criminal Justice Committee
Greg Krueger, Member
Joshua Prokopec, Alternate

East Central Regional Juvenile Center
Jim Abbe, Member
John Glynn, Alternate

Economic Development Authority
Jim Abbe, Member
Greg Krueger, Alternate

Extension Committee
James Brady, Member
John Glynn, Member
Jim Abbe, Alternate

Hope Drainage
James Brady, Member
John Glynn, Alternate

Joint Powers, Advisory Board, Regional Representation

Intergovernmental Committee
All Commissioners

Intergovernmental Joint Agency Task Force
Jim Abbe, Member
James Brady, Member
Greg Krueger, Alternate

Intergovernmental Joint Transportation Committee
Jim Brady, Member
Greg Krueger, Member
John Glynn, Alternate

Judicial Ditch 1, 6, 24
Jim Abbe, Member
John Glynn, Member
Joshua Prokopec, Member

Judicial Ditch 2
John Glynn, Member
James Brady, Member
Jim Abbe, Member

Judicial Ditch 5
James Brady, Member
John Glynn, Member
Greg Krueger, Member

Judicial Ditch 7, 10, 11, 12, 19, 23
James Brady, Member
John Glynn, Member

Law Library
Jim Abbe, Member
Greg Krueger, Alternate

Local Housing Trust Fund
Greg Krueger, Member
Joshua Prokopec, Alternate

MNPrairie County Alliance – All Commissioner
All Commissioners

MNPrairie County Alliance – Board
Jim Abbe, Member
Greg Krueger, Member
James Brady, Alternate

MNPrairie County Alliance - Finance
Greg Krueger, Member
Jim Abbe, Alternate
Finance Director, Member
Administrator, Alternate

MNPrairie County Alliance - Personnel
Jim Abbe, Member
Greg Krueger, Alternate

Multi-County Solid Waste Committee
Jim Abbe, Member
Joshua Prokopec, Alternate

Planning Commission Liaison
James Brady, Member
John Glynn, Alternate

Recorder's Compliance Fund Committee
John Glynn (Land Use/Record Chair)
Jim Abbe, Alternate

Regional Railroad Authority
All Commissioners

Rice-Steele 911 Dispatch Joint Powers Board
James Brady, Member
Jim Abbe, Member
Joshua Prokopec, Alternate

SE MN Comm Action Agency (SEMCAC)
Joshua Prokopec, Member
Greg Krueger, Alternate

SE MN Emergency Communications Board
Greg Krueger, Member
Joshua Prokopec, Alternate

Joint Powers, Advisory Board, Regional Representation

SE MN Emergency Medical Services
Joshua Prokopec, Member
Jim Abbe, Alternate

SE MN Recyclers Exchange (SEMREX)
John Glynn, Member
Joshua Prokopec, Alternate

SMART Transit Advisory Board
Greg Krueger, Member
James Brady, Alternate

Soil & Water Conservation District Liaison
James Brady, Member
John Glynn, Alternate

South Central Human Relations Center
James Brady, Member
Joshua Prokopec, Member
Greg Krueger, Alternate

South Country Health Alliance
Greg Krueger, Member
Jim Abbe, Alternate

Southern MN Tourism
Jim Abbe, Member
John Glynn, Alternate

Southern MN Association of Regional Trails
Greg Krueger, Member
Jim Abbe, Alternate

Steele County Historical Society Liaison
John Glynn, Member
Greg Krueger, Alternate

Steele County Water Planning Committee
All Commissioners

Steele County Weed Management Association
James Brady, Member
John Glynn, Alternate

Steele-Waseca Drug Court
Joshua Prokopec, Member
James Brady, Alternate

U.S. Highway 14 Partnership
All Commissioners

Workforce Development Board
Joshua Prokopec, Member
Greg Krueger, Alternate

Zumbro River Watershed Partnership
James Brady, Member
John Glynn, Alternate

State / National

Association of Minnesota Counties (AMC)
All Commissioners

AMC Policy Committees
Environ. & Natural Resources: John Glynn
General Government: Jim Abbe
Health & Human Services: Greg Krueger
Public Safety: Joshua Prokopec
Transportation & Infrastructure: James Brady

Minnesota Counties Intergovernmental Trust
James Brady, Member
Greg Krueger, Alternate

National Association of Counties
All Commissioners

Gmail

Meeting Minutes

4 messages

[redacted] Fri, Jan 31, 2025 at 4:18 PM
To: "Fry, Renae" <Renae.Fry@steelecountymn.gov>

Hi Renae,

I'm looking for the meeting minutes from the Joint Transportation Committee meeting referenced in the board meeting minutes. I've searched Steele County's website but haven't been able to find them. Could you point me in the right direction?

Also, could you share the schedule for when they meet? I wasn't able to determine that from the board meeting minutes.

Thanks,
Melissa

[redacted] Fri, Jan 31, 2025 at 4:23 PM
To: "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Hi Rebecca,

I noticed that Renae is out of the office until February 10th. While this isn't urgent, I'm hoping it's a quick and easy answer that doesn't need to wait until then. Please see my original email below.

Thanks,
Melissa

Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> Tue, Feb 4, 2025 at 3:54 PM
To: [redacted]
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Melissa,

From this point forward, please direct any requests for documents/questions regarding the East Side Corridor to only myself and Ms. Fry. We will track the requests, provide data in the order it was requested, and in compliance with the Chapter 13 Government Data Practices Act.

The Act does not require specific time frames for data release and does not require government agencies to answer specific questions.

The County is still working on reviewing current data requests on top of the day-to-day normal operations. I do not have an estimated time frame right now.

Related to your request below for "Joint Transportation Committee" minutes, Steele County does not maintain those minutes, so therefore does not have the minutes to provide you.

Thank you,

Rob

Robert J. Jarrett

County Attorney

Steele County Attorney's Office

303 S. Cedar Avenue

Owatonna, MN 55060

Tel: 507-444-7780

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[redacted] Wed, Feb 5, 2025 at 12:44 PM

To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>

Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Robert,

Sure thing. I initially sent this to Renae, assuming she would have the answer. I received an out-of-office response directing me to contact Rebecca, so I did.

I expected the Joint Transportation Committee Meeting to have a publicly available schedule and meeting details, like other committees, but I couldn't find that information, which is why I reached out through the appropriate channels. I wasn't aware that this type of information is considered a data request, especially since schedules pertain to future events.

I look forward to hearing where I can find this information.

Thanks,
Melissa

Gmail

Data Request

6 messages

[redacted] Mon, Mar 31, 2025 at 9:28 AM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>, "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

I am submitting the attached data request for review, ASAP. I have copied the County Administrator and County Attorney as requested.

Thanks,
Melissa Zimmerman

JointTransporationCommiteeDataRequest03312025.docx
73K

Jarrett, Robert <Robert.Jarrett@steelecountymn.gov> Tue, Apr 1, 2025 at 5:15 PM
To: [redacted] "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Ms. Zimmerman,

This is not a data request. Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act (MGDPA), requires government entities to allow the public to view or obtain copies of government data. Chapter 13 does not require government entities to answer specific questions, to create data, or to reorganize data into a particular format in order to answer questions.

This request will be closed.

Sincerely,

Robert Jarrett

Steele County Data Practices Responsible Authority

Robert J. Jarrett

County Attorney

Steele County Attorney's Office

303 S. Cedar Avenue

Owatonna, MN 55060

Tel: 507-444-7780

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[Quoted text hidden]

[redacted] Tue, Apr 1, 2025 at 5:38 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Dear Mr. Jarrett,

I am requesting any and all data pertaining to the topics outlined in my request. I am not expecting you to answer a question; I am requesting access to existing government data, which should be standard practice under the Minnesota Government Data Practices Act.

If my request needs to be submitted in a different format, please let me know so I can adjust accordingly. Otherwise, please proceed with processing this as a formal data request.

Sincerely,
Melissa Zimmerman

[Quoted text hidden]

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image001.png
20K

[redacted] Wed, Apr 2, 2025 at 12:55 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Here is the requested data, reformatted into statements.

[Quoted text hidden]

---

2 attachments

image001.png
20K

JointTransporationCommiteeDataRequest03312025 (1).docx
73K

[redacted] Thu, Apr 10, 2025 at 8:16 AM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

It has been 8 days and I have not received confirmation on this data request.

[Quoted text hidden]

---

image001.png
20K

[redacted] Mon, Apr 14, 2025 at 8:21 PM
To: "Jarrett, Robert" <Robert.Jarrett@steelecountymn.gov>
Cc: "Fry, Renae" <Renae.Fry@steelecountymn.gov>, "Kubicek, Rebecca" <Rebecca.Kubicek@steelecountymn.gov>

Dear Mr. Jarrett and Ms. Fry,

This is a formal follow-up regarding my data request originally submitted on March 31, 2025, and resubmitted in clarified format on April 2. Despite multiple efforts on my part—including a request for clarification and a follow-up on April 10—I have not received any acknowledgment, response, or update.

In your email dated April 1 at 5:15 p.m., you stated my request was not valid under Minnesota Statutes Chapter 13 and indicated the request would be closed. However, you failed to cite any specific provision of the law that justified denying or delaying the request. In my response later that day, I clarified that I was requesting access to existing government data—not answers to questions—and asked that you let me know if any changes were needed in formatting. You did not respond.

I then removed all question marks and resubmitted the same request on April 2. Again, you did not process it. In a separate message on April 10, you indicated that this request will not be addressed until other ESC-related data requests are fulfilled. That is not permissible under Minnesota law.

This refusal to process a lawful request until others have been completed is a direct violation of your obligations under the Minnesota Government Data Practices Act (MGDPA).

Violations of Statute:

1. **Minn. Stat. § 13.03, subd. 2(a)**
   The statute requires that government entities respond to data requests in an appropriate and prompt manner. There is no provision in the statute that allows an entity to refuse a new request simply because other requests are still pending. Each request must be handled independently and without delay.

2. **Minn. Stat. § 13.03, subd. 3(f)**
   If access to data is denied, the Responsible Authority must provide written notice to the requestor, including the specific statutory section on which the denial is based. To date, you have not provided such a citation.

3. **Improper Refusal to Accept a Valid Request**
   Multiple Advisory Opinions issued by the Commissioner of Administration—including 95-042, 04-019, and 05-030—make clear that:

- A data request cannot be denied simply because it contains question formatting or interpretive language.
- If a request seems unclear, the entity must seek clarification, not dismiss it.
- Government entities cannot refuse to process valid requests due to workload or the existence of other pending requests.

Expectations:

I am now formally demanding the following:

1. Immediate reinstatement and full processing of my March 31 (resubmitted April 2) data request.
2. A written acknowledgment that this request is being processed in accordance with Minnesota Statutes Chapter 13.
3. A specific citation of the legal basis you relied on to close or delay my request, as required under Minn. Stat. § 13.03, subd. 3(f).
4. A copy of Steele County's Data Practices Policy, and the names and contact information for both the Responsible Authority and the Data Practices Compliance Official, as required by Minn. Stat. § 13.05, subd. 13.

If I do not receive written confirmation that this request is being processed in full compliance with the law by **April 15, 2025**, I will be filing formal complaints with the following:

- Office of the State Auditor
- Minnesota Attorney General's Office
- Department of Administration – Data Practices Office

This continued refusal to comply with the law obstructs lawful access to public data and raises serious concerns regarding Steele County's data handling practices.

Sincerely,
Melissa Zimmerman
[Quoted text hidden]

Gmail

data request

12 messages

Kris M. Busse <kris.busse@owatonna.gov> Thu, Apr 3, 2025 at 9:56 AM
To: [redacted]

Good morning,

I am writing on behalf of the City of Owatonna ("City") to acknowledge receipt of your request dated March 31, 2025, requesting information from the City relating to the joint transportation committee. The City is working on this request and will respond based on its obligations under the MGDPA.

Kris Busse

City Administrator

Administrative Services Department

WE CREATE A BETTER TOMORROW

Phone: 507-774-7340

Email: kris.busse@owatonna.gov

540 West Hills Circle, Owatonna, MN 55060

www.owatonna.gov

[redacted] Thu, Apr 3, 2025 at 10:04 AM
To: [redacted]

They're going to pull data. Woo-hoo. IDENTICAL request that the county denied.

[Quoted text hidden]

3 attachments

image001.png
22K

image002.png
2K

image003.png
2K

Kris M. Busse <kris.busse@owatonna.gov> Mon, Apr 14, 2025 at 4:40 PM
To: [redacted]

Good afternoon,

I reviewed your online “Data Request” for the City of Owatonna. Your correspondence is not a valid request for data. The Minnesota Government Data Practices Act (MGDPA), requires government entities to provide data that is requested that is accessible to the requester, subject to a government entity’s policies and procedures for making a request for data. The MGPDA does not require the city to answer questions that are not requests for data. Your correspondence asked questions instead of requesting data. Accordingly, the city is not required to respond to your correspondence under the MGDPA nor provide any data as no valid request for data was made.

[Quoted text hidden]

[redacted] Mon, Apr 14, 2025 at 5:09 PM
To: "Kris M. Busse" <kris.busse@owatonna.gov>

Dear Administrator Busse,

Thank you for your response. I respectfully disagree with your conclusion that my request was not a valid request for data under the Minnesota Government Data Practices Act (MGDPA).

To clarify, under Minn. Stat. § 13.03, subd. 3, a valid request for government data does not require specific legal language; a requestor need only reasonably describe the data sought. If you believe portions of my correspondence contained questions rather than topics, I am happy to refine or clarify the request. However, if any portion of my request reasonably seeks access to existing government data, the City has an obligation to respond accordingly.

Please specifically identify:

1. Which portions of my request you view as improper "questions" versus valid data requests.
2. Whether the City has any responsive existing government data related to the subject matter of my request.
3. If the City is denying access to any requested data, please cite the specific legal authority (statutory section and subdivision) on which you rely for any denial, as required by Minn. Stat. § 13.03, subd. 3(f).

I look forward to your clarification so that I may either modify or resubmit my request if necessary. Thank you for your attention to this matter.

Sincerely,
Melissa Zimmerman

Comment #209

ESC EAW Comment #21

Failure to Analyze Downtown Impacts Despite Stated Purpose and Need

A stated purpose and need of the East Side Corridor project is to divert through traffic away from downtown Owatonna in order to reduce traffic volumes on downtown streets. The Environmental Assessment Worksheet (EAW) repeatedly relies on this objective as a project benefit. However, the EAW fails to evaluate the reasonably foreseeable environmental, economic, social, cultural, and fiscal impacts associated with achieving that stated purpose.

The EAW does not include any analysis of how traffic diversion may affect downtown businesses, pedestrian activity, cultural events, community vitality, or the long-term health of Owatonna's historic downtown core. No studies are provided examining potential changes in customer access, foot traffic, tourism, special events, or the economic resilience of small businesses that rely on downtown circulation. These are not speculative impacts; they are direct and foreseeable consequences of intentionally removing traffic from a central commercial and cultural area.

The EAW also fails to evaluate whether traffic diversion and associated infrastructure investment may incentivize the relocation of businesses and employment centers away from the downtown area toward newly developed corridors. Large-scale commercial relocation is a reasonably foreseeable indirect effect of new transportation infrastructure, particularly when paired with expanded roadway capacity and greenfield development opportunities. Such shifts can accelerate downtown disinvestment, reduce economic diversity, and destabilize existing employment and service centers. The EAW provides no analysis of these relocation pressures or their cumulative impacts on the downtown economy.

In addition, the EAW fails to assess the fiscal implications of potential downtown economic decline. If reduced traffic, disinvestment, or business relocation results in vacancies or diminished commercial activity, the resulting loss of commercial tax base would foreseeably increase reliance on residential property taxes and other public revenues to maintain municipal and county services. The EAW provides no analysis of potential reductions in commercial property values, sales tax revenue, or the downstream effects on taxpayers citywide. These fiscal consequences are reasonably foreseeable and directly connected to the project's stated purpose.

By asserting downtown traffic diversion as a project benefit while failing to analyze the consequences of that diversion, the EAW presents an incomplete and misleading environmental baseline. MEPA requires evaluation of reasonably foreseeable indirect and cumulative impacts, including economic and land-use changes induced by infrastructure investments. The EAW's failure to study impacts that flow directly from the project's stated purpose and need demonstrates that the scope of review is unlawfully narrow and outcome-driven.

Because downtown impacts are central to the project's justification, they cannot be excluded from environmental review. The omission of this analysis materially undermines the adequacy

of the EAW and precludes its use to support a Finding of No Significant Impact (FONSI). A full Environmental Impact Statement (EIS) is required to evaluate the environmental, social, economic, and fiscal consequences of diverting traffic from downtown Owatonna and to allow informed decision-making and meaningful public participation.

Owatonna East Side Corridor Residents
OwatonnaEastSideCoridor@gmail.com

Comment #210

ESC EAW Comments #10

Failure to Apply the Avoid–Minimize–Mitigate Hierarchy - Mitigation Refusal and MEPA/NEPA Noncompliance

MEPA and NEPA require agencies to follow a mitigation hierarchy when evaluating environmental impacts: **avoid impacts where feasible, minimize impacts where avoidance is not feasible, and mitigate remaining impacts**. This hierarchy is not discretionary and must be reflected in project planning and environmental analysis.

Throughout the East Side Corridor process, residents repeatedly asked how impacts to homes located immediately adjacent to the proposed roadway would be avoided, minimized, or mitigated. Project staff and elected officials repeatedly dismissed or refused mitigation rather than evaluating it.

At the **July 21, 2022 Open House**, residents were first introduced to the East Side Corridor project. At that meeting, the **Assistant County Engineer and Project Manager, Paul Sponholz**, told residents that the county *"didn't have to put in any mitigations because they didn't put any in on 26th Street."*

At a **May 26, 2023 stakeholder meeting**, when residents asked how they would be protected from impacts associated with placing the roadway immediately adjacent to existing homes with the just stated 750 truck traffic per day, **Mr. Sponholz** stated, *"Are you talking about a noise wall? Because you don't want a noise wall. Noise walls are for major roads like I-35 or Highway 14."*

Residents were also told on multiple occasions that:

- they "wouldn't want a noise wall,"
- the county was not going to build a noise wall, and
- officials themselves would not want a noise wall if they lived there.

In early 2024, a city official told a resident that rather than complying with noise mitigation requirements, *"maybe we can get the state to change them."*

At the December 11, 2025 open house, the County Administrator explicitly rejected each step of the mitigation hierarchy when questioned by a resident:

- **Avoidance**: rejected
- **Minimization** (including alternative pavement types): rejected
- **Mitigation** (noise walls): rejected

During that exchange, berm heights were materially mischaracterized, and the discussion ended without any mitigation analysis being offered.

These statements demonstrate a systemic refusal to apply the required mitigation hierarchy. Rather than evaluating feasible avoidance, minimization, or mitigation measures, impacts to residents were treated as unavoidable and normalized.

An environmental review that rejects mitigation in advance, without analysis, cannot support a Finding of No Significant Impact. The failure to apply the mitigation hierarchy requires preparation of a full Environmental Impact Statement.

Owatonna East Side Corridor Residents
owatonnaeastsidecorridor@gmail.com

Comment #211

ESC EAW Comments #26

Impaired Public Participation, Predetermination, and Incomplete Alternatives Analysis

The Environmental Assessment Worksheet (EAW) for the East Side Corridor is deficient under the Minnesota Environmental Policy Act (MEPA) due to impaired public participation, advancement of key decisions without transparency, and unresolved inconsistencies regarding authority over alignment and mitigation.

Public data demonstrate that City, County, and consultant staff coordinated public-facing communications and responses to community input, with expressed concern about generating additional public comments. This approach reflects a focus on managing public engagement rather than facilitating it and is inconsistent with MEPA's requirement for neutral and transparent environmental review.

These process failures became especially pronounced following the April 8, 2025 County Board meeting, at which the County advanced actions to remove federal funding from the project. That decision materially altered the scope of environmental oversight and directly affected mitigation requirements, including noise mitigation and avoidance measures. Despite the significance of this change, residents were not provided a meaningful opportunity to understand how or why the decision was made, what alternatives remained available, or how the removal of federal oversight would affect environmental protections, despite repeated non-responsive inquiries.

Following the April 8 meeting, residents sought clarification regarding how prior alignment and mitigation decisions had been reached and whether reasonable avoidance or safety alternatives remained under consideration. Those discussions did not occur. Instead, opportunities for engagement narrowed at precisely the moment when final mitigation decisions were advancing. As a result, informal public participation declined, and the environmental record does not reflect the full scope or persistence of community concerns related to safety, noise, and avoidance.

In addition, explanations regarding decision authority and project location were inconsistent. Residents were advised that Owatonna Township controlled the project's location, followed shortly thereafter by formal township action limiting the project alignment. The EAW does not disclose when alignment decisions were effectively determined, how authority was exercised among governing entities, or whether alternatives were foreclosed prior to environmental review. These unresolved inconsistencies undermine the integrity of the alternatives analysis required under MEPA.

The next day, residents submitted public data requests on April 9, 2025 seeking records related to the transfer of federal funds and the basis for that decision. To date, those requests have not been fulfilled. The absence of this information has impaired the public's ability to understand how the decision to remove federal funding was reached, how mitigation requirements were evaluated, and how environmental protections were affected. As a result, meaningful public

participation during a critical phase of environmental decision-making has been substantially limited.

When a project advances through major funding, alignment, and mitigation decisions without transparent explanation or meaningful public engagement—particularly after federal oversight is removed during a period when residents had publicly announced their intent to pursue formal remedies to obtain access to project information —the resulting EAW cannot be relied upon as a complete or objective disclosure document. MEPA requires more than procedural availability of comment periods; it requires good-faith evaluation of reasonable alternatives informed by public participation.

For these reasons, the EAW fails to satisfy the requirements of Minn. R. 4410. Preparation of a full Environmental Impact Statement (EIS) is necessary to ensure that decision-making authority, alternatives, mitigation, and environmental impacts are fully and fairly evaluated.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #212

ESC EAW Comments #14

Supplemental Technical Comment – Analysis of the 61-Page Memorandum and Purpose and Need

This supplemental technical comment is submitted to preserve the environmental record and address substantive deficiencies in the analysis supporting the selected preferred alternative.

As described in the ESC EAW Comment #12 regarding denial of public participation, residents were not provided a public comment period or hearing after selection of the preferred alternative on September 24, 2024. As a result, residents were denied the opportunity to submit technical analysis responding to the subsequent 61-page memorandum that materially shaped the project's purpose and need, traffic assumptions, and alternatives analysis and has been attached to this comment.

In the absence of a formal comment opportunity, residents independently reviewed the memorandum and identified multiple deficiencies, including but not limited to:

- Selective reliance on historical studies and planning documents to support the preferred alternative, while omitting or disregarding portions of the same record that contradict the stated conclusions or support less impactful alternatives.
- Collapse of purpose and need to justify a predetermined outcome rather than evaluate environmental constraints;
- Selective use of assumptions instead of standard formulas that favor one alternative while disadvantaging others;
- Elimination of Alternatives 4 and 5 without consistent or technically supported reasoning;
- Omission of feasible options that emerge when uniform analytical methods are applied;
- Internal inconsistencies between stated assumptions and numerical outputs.

When standard analytical methods are applied consistently across alternatives, Alternatives 4 and 5 remain viable and cannot be dismissed on the basis asserted in the memorandum. The removal of these alternatives therefore reflects analytical manipulation rather than environmental constraint.

This analysis was prepared by a resident holding a **Bachelor of Science in Mathematics and Computer Science** and relies on standard quantitative reasoning, transparent calculations, and internally consistent assumptions. The analysis would have been submitted during a public comment period had one been provided.

Because this memorandum was never subject to public review or comment, its conclusions cannot be relied upon to support a Finding of No Significant Impact. The failure to allow scrutiny of the analytical foundation for the preferred alternative further demonstrates the need for preparation of a full independent Environmental Impact Statement.

Owatonna East Side Corridor Residents
owatonnaeastsidecorridor@gmail.com

Challenging Misleading Data: Prioritizing Safety, Accuracy, and Accountability in the East Side Corridor Federal Memorandum

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Chapter 1: History of the East Side Corridor

Introduction

The 61-page "Evaluation of Alternatives" Memorandum was prepared by Mary Gute of WSB on behalf of former Steele County Engineer Greg Ilkka and submitted to Phillip Forst of the Federal Highway Administration (FHWA) and Dale Gade of the Minnesota Department of Transportation (MnDOT) on August 13, 2024. It received formal approval from FHWA on September 3, 2024, and was subsequently circulated to Paul Sponholtz (current Steele County Engineer and project lead), Andrew Plowman (WSB Project Manager), Fausto Cabral (MnDOT District 6 State Aid Engineer), and others.

The document pertains to State Aid Project 074-070-009, which evaluates route alternatives for the proposed East Side Corridor. According to the Memorandum, the East Side Corridor is a joint initiative between Steele County and the City of Owatonna.

Given the Memorandum's use in federal and state environmental review processes, its accuracy and transparency are not only procedural matters—they are legal, financial, and ethical imperatives. Any inconsistencies, omissions, or biased representations in this document can significantly impact affected residents, undermine lawful planning standards, and erode public trust.

Page 1: Responsibility for East Side Corridor Project

The Memorandum confirms that the East Side Corridor is a joint initiative between Steele County and the City of Owatonna.

> This memo is being completed as part of the East Side Corridor Study, led by Steele County in cooperation with the City of Owatonna. The sections that follow discuss the

Page 3: Contradictory Use of Previous Studies

For nearly a year, city and county officials—including commissioners, engineers, council members, and administrators—have consistently stated that this is a "new project with a new purpose", thereby invalidating previous studies. This position has been publicly reiterated by City Administrator Kris Busse during City Council meetings and is documented in the public record.

However, this Memorandum now incorporates and compares data from those very past studies. This shift in narrative—treating older reports as both invalid and valid depending on the context—creates confusion and undermines transparency in the decision-making process.

> Previous planning efforts on the east side of Owatonna were initially reviewed to help define the study area and to develop East Side Corridor alternatives. Previously completed plans, studies, environmental documents, and mapping documents related to potential north-south transportation routes on the east side of Owatonna that have been completed since the 1990s are documented in the Owatonna East Side Corridor Location Memo, completed in August 2022 (see **Attachment A**). A common theme of the previous studies was similar to this project's purpose, which is to improve the connectivity of Steele County's transportation network and to meet near term and future travel needs on the east side of the City of Owatonna and adjacent townships.

Page 3: 24th Ave: Misrepresented History and Right-of-Way Confusion

The Memorandum references the 1999 study of 24th Avenue, which was rejected at that time for being too close to residential neighborhoods. That report recommended shifting the alignment 800 feet east to minimize noise and environmental impact (1999 Environmental Assessment Worksheet, p. 11).

Importantly:

- 24th Avenue was never designated as an officially mapped right-of-way.
- In 2000, a 150-foot-wide right-of-way—located 1,200 feet east of Greenhaven—was officially mapped and filed as what became known as 29th Avenue (Doc: A280471).
- The 2004 US 14 Beltline Study recommended preserving 34th Avenue (Alternative 5) and 44th Avenue for future corridors, noting 34th Avenue should serve as an *internal collector* with an overpass south of Highway 14.
- That same study recommended against using the mapped right-of-way as a beltline, suggesting it should only function as a shorter city street at most. (Page 30)

Subsequent planning and development reflected this shift:

- **2004 to Present** Homes and utilities were built on the officially mapped 29th Avenue right-of-way. 150' no longer exists.
- **2005-2025 Steele County Transportation Plan** identified (Page 11 & 15):
  - 29th Avenue as a short city street connector (Dane Road to Rose Street)
  - 34th Avenue (Alternative 5 today) as the preferred inner corridor
  - 44th Avenue as the external beltline
- **2006 Owatonna Development Plan** also designated 29th Avenue as a shorter city street, not an inner collector and 34th Avenue (Alternative 5 today) as an inner corridor. (Page 24, 37, 49)
- **2009:** Both 34th Avenue (Alternative 5 today) and 44th Avenue were officially mapped as 150-foot-wide right-of-way, aligning with the US 14 Beltline Study 2004.

Contrary to the Memorandum's claims, 24th Avenue was neither an officially mapped corridor nor comparable to current Alternative 3. Its designation as "Alternative A" in the 1990s placed it along what were then the outer edges of the city—similar in location to today's Alternative 1. These distinctions matter because omitting them distorts both the historical planning context and public understanding.

Many of these previous planning efforts focused on identifying a beltline route that would connect to US 14. In 1999 the Steele County Board selected a section of a beltline corridor route called 24th Ave, which would have largely been on new alignment. This route is similar to Alternative 3 in **Figure 1**. When MnDOT was planning to convert US 14 into a freeway and included an interchange at US 218/Bixby Road, it was then determined that the 24th Ave route could no longer connect to US 14 due to freeway interchange spacing requirements.

Studies in 2004 and 2011 concluded with the Steele County Board selecting CSAH 43 (44th Ave NE) as the east beltline and MnDOT committing to a future US 14 interchange at CSAH 43. With the potential beltline corridor moved farther east of Owatonna's city limits, the 2004 study identified that two additional north-south, inner collector roadways, closer to downtown Owatonna than CSAH 43, would be needed to meet area transportation needs. These inner collectors were recognized as necessary because the CSAH 43 alignment beltline would not contribute to reducing the downtown area traffic congestion due to distance.

The 2004 study documented that the 24th Ave route had been Officially Mapped by the County Board and that the City of Owatonna would assume responsibility for constructing the road as development warranted.[1] The 24th Ave route was planned to meet the existing transportation needs to reduce downtown traffic congestion and to accommodate existing development. The 2004 plan also recommended that the 34th Ave corridor (similar to Alternative 5, shown in **Figure 1**) be preserved for another long-term future internal collector roadway to accommodate additional long term city growth.[2] Based on that recommendation, the Steele County Board Officially Mapped the 34th Ave route.

These two, north-south corridors – 24th Ave and 34th Ave – are both included in the 2006 City Comprehensive Plan and Steele County's 2040 Transportation Plan. The locations of these identified future routes align with FHWA spacing guidelines and would serve future development without contributing additional congestion to the downtown area.

Page 4: Deviations to Mapped Right of Way

The Memorandum notes route deviations intended to avoid future development areas—specifically, vacant lots in a new subdivision north of town. However, similar efforts were not made to avoid established neighborhoods like North Country.

Despite repeated resident inquiries, the county has not provided data or justification for why some areas were spared while others were not. This inconsistency raises concerns about fairness in how impacts were distributed and decisions prioritized.

Alternative 3
New alignment approximately 2.2 miles east of CSAH 1/Cedar Ave/CSAH 45, with deviations north of CSAH 19 (Rose St) and south of CR 180. This alternative is generally consistent with the location of a Steele County officially mapped corridor.

Page 6: Contradictions in Pedestrian and Bicycle Comfort Measures

The Memorandum states that pedestrian and bicycle comfort measures were identical across all alternatives and therefore not used as criteria in selecting a preferred corridor.

However, later portions of the document inconsistently highlight bicycle accessibility as a differentiator—particularly in favor of some alternatives over others. This contradiction contributes to confusion and may mislead readers into thinking bikeability varied by route when it did not.

distances between origins and destinations by walking were all over 1 mile. Therefore, all of the alternatives were found to rate low for this measure. Additionally, the results for the criteria used to measure pedestrian and bicycle comfort all yielded high ratings for all alternatives, meaning that there was not a difference among the alternatives for this measure. Because all alternatives rated the same for these two measures and provided no differentiation, these measures were not included in discussion below or used to make a corridor recommendation. The evaluation process was structured so that if an alternative did not meet the majority of Step 1 criteria, it was eliminated from further evaluation in Step 2. The results of the project needs evaluation are shown in **Table 1** and described below.

Page 7: Inconsistent and Misleading Data Comparisons

Several discrepancies appear in the comparison tables, particularly around **connectivity, access, and location within city boundaries**:

- **Connectivity:** Page 34 addresses connectivity but contains significant discrepancies, including inaccurate distances and incorrect highlighting.
- **Access to existing subdivisions:** Noted yes for Alternatives 1–3. Alternatives 2 and 3 are shown to connect with existing neighborhoods, yet both would require continuous noise walls that effectively block access to the North Country Subdivision—functionally rendering them similar to Alternative 4, which is highlighted differently.
- **City Boundary Markings:** Alternatives 1b and 1c are listed as "within city boundaries: Yes," while Alternatives 2 and 3 are marked as "partially." In fact, **none** of the alternatives lie entirely within city limits. These inconsistencies may affect how the public and agencies perceive regulatory oversight and annexation implications.
- **Future Growth Boundaries**: The Memorandum states that Alternative 4 is on the "edge" of the future growth boundary. However, maps on pages 29 and 59 clearly show that the growth area extends to 34th Avenue (Alternative 5), placing Alternative 4 squarely within it—just like Alternative 3. The distinction presented is misleading.
- **Bicycle Accessibility:** While earlier pages stated this factor was not considered in route selection, the table on page 34 flags Alternative 4 negatively in red for bicycle accessibility—despite all routes having equal provisions. This selective emphasis distorts the comparison.

Table 1: Purpose & Need Performance Measures

Category	Evaluation Criteria	Performance Measures	1A: New alignment approx. 2 mi east of CSAH 1/Cedar Ave/CSAH 45	1B: Modification of Alt 1 to include Kenyon Rd and Dane Rd N or Dane Rd	1C: Modification of Alt 1 to include route along E Rose St, Partridge Ave, and new alignment S of Rose St.	2: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45	3: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45, with deviations N of Rose St and S of CR 180	4: New alignment approx. 2.5 mi E of CSAH 1/Cedar Ave/CSAH 45	5: 34th Ave E, approx. 3 mi E of CSAH 1/Cedar Ave/CSAH 45
Vehicle Mobility	Connectivity	Travel time between origins and destinations. Trip length/distance.* **(Attachment C)**	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 1 trip; same or similar time for 3/5 trips; longer for 1 trip. Shorter distance for 1 trip; same or similar distance for 3/5 trips; longer distance for 1 trip.	Shorter travel time for 1 trip; same or similar time for 3/5 trips; longer travel time for 1 trip. Shorter distance for 1 trip; same or similar distance for 3/5 trips; longer distances for 1 trip.	Same or similar travel time for 3/5 of trips; longer travel time for 2 trips. Shorter distance for 1 trip; longer distance for 4/5 of trips.	Longer distances and slower travel times for all 5 trips analyzed
	Downtown Congestion Impacts	Volume/Capacity ratios and typical planning-level capacity thresholds on downtown roadways **(Attachment D)**	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.93 Mineral Springs Rd (2): 1.01 Cedar Ave N: 0.92
	Land Use and Anticipated Growth Areas **(Attachment E)**	• Potential to support **current** land uses • Within and around the official city limits/boundary	Access to existing developments: yes Within city boundary: partially	Access to existing developments: yes Within city boundary: yes	Access to existing developments: yes Within city boundary: yes	Access to existing developments: yes Within city boundary: partially	Access to existing developments: yes Within city boundary: partially	Access to existing developments: no Within city boundary: no	Access to existing developments: no Within city boundary: no
		• Potential to support **future** land uses • Within and around the growth area boundary	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: edge	Access to future land uses: yes Within future growth boundary: no
Walkability and Bikeability **(Attachment F)**	Connections to Existing and Planned City Trails	Number of connections to **existing** city trails	**Existing:** Rose St E (to the west) (1)	**Existing:** 26th St NE (west), Mineral Springs Rd NE, Rose St E (west) (3)	**Existing:** Rose St (1)	**Existing:** none (0)	**Existing:** none (0)	**Existing:** none (0)	**Existing:** none (0)
		Number of connections to **planned** city trails	**Planned:** 26th St NE, Buxton Trail extension, Dane Rd, Rose St (to the east), 18th St SE (5)	**Planned:** 26th St NE (east), Dane Rd, Buxton Trail extension, Rose St (east), 18th St SE (5)	**Planned:** 26th St NE, Bruxton Trail extension, Dane Rd, Rose St, Havana Rd SE, 18th St SE (6)	**Planned:** 26th St NE, Dane Rd, Rose St, 18th St SE (4)	**Planned:** 26th St NE, Dane Rd, Rose St, 18th St SE (4)	**Planned:** 26th St NE, Dane Rd (2)	**Planned:** 26th St NE (1)
	Distances between Key Origins and Destinations as Compared to Distances People Are Willing to Walk and Bike	Alternative results in distances between origins and destinations** that people are willing to travel: **1 mile for walking**	No	No	No	No	No	No	No
		Alternative results in distances between origins and destinations** that people are willing to travel: **3 miles for biking**	Yes	Yes	Yes	Yes	Yes	No	No
	Pedestrian and Bicycle Comfort	• **P**edestrian Multimodal Level of Service (Oregon method) for segments • **B**icycle Multimodal Level of Service (Oregon method) for segments***	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C

Legend		
Low: Similar or longer travel times for all 5 trips analyzed.	**Medium:** Shorter travel time for at least one but less than 3 of the 5 trips analyzed	**High:** Shorter travel time for at least three of the 5 trips analyzed.
Low: At least one V/C ratio greater than 1.0	**Medium:** All V/C ratios less than 1.0. At least one V/C ratio greater than 0.80.	**High:** All V/C ratios less than 0.80
Low: does not provide direct access to existing developments AND not within city boundary	**Medium:** provides direct access to existing development(s) AND partially within city boundary	**High:** provides direct access to existing developments AND within city boundary
Low: does not provide access to future land uses OR is not within future growth boundary	**Medium:** provides access to future land uses AND is on edge of future growth boundary	**High:** provides access to future land uses AND is within future growth boundary
Low: 0 connections to existing city trails	**Medium:** 1-4 connections to existing city trails	**High:** 5+ connections to existing city trails
Low: 0 connections to planned city trails	**Medium:** 1-4 connections to planned city trails	**High:** 5+ connections to planned city trails
Low: Distance between origins and destinations is >1 mile	**Medium:** NA	**High:** Distance between origins and destinations is <1 mile
Low: Distance between the majority of origins and destinations is >3 mile	**Medium:** NA	**High:** Distance between the majority of origins and destinations is <3 mile
Low: Any MMLOS F	**Medium:** MMLOS D and/or E	**High:** All MMLOSs range from A-C

* Similar travel time refers to same travel time as existing to the nearest minute when rounded. Similar distance means within 0.5 miles of existing distance.
Some trips with longer distances have shorter travel times, primarily because these trips go through less-developed areas, allow for higher travel speeds, and result in less conflicting traffic compared to other routes.
** Origins (residential locations located within close proximity of the study area) and destinations (Owatonna High School, Owatonna Soccer Complex, Lincoln Elementary School, Hammann Park, Daikin Soccer Complex, Nass Woods Park, and Mineral Springs Park)
*** MMLOS was calculated for each alternative as one segment, assuming that corridor characteristics would be relatively similar. Inputs required for intersection MMLOSs are not available at this level of study.
Pedestrian LOS assumptions: one lane in each direction, sidewalk width of at least 5ft, speed limit at least 40 mph, and less than 500 vehicles/hr. Bicycle LOS assumptions: one lane in each direction, bicycle lane or shoulder at least 4ft, speed limit is not 30 mph or less, and there are unsignalized conflict points. Both were done for intersections only.

Summary of Pages 4–7

When corrected for accuracy and consistency, Alternative 4 closely resembles Alternative 3 in terms of location, access, and connectivity—but offers distinct advantages in terms of avoiding residential impacts. The inconsistencies in how these criteria are applied and visually highlighted suggest a potential bias in how data was presented to favor certain outcomes.

Page 8: Biased Assessment Criteria in Route Comparison

The Memorandum's comparison of travel times and distances presents several inconsistencies, particularly in how routes are visually and numerically rated.

Route Comparison

According to WSB's data on page 34 of the Memorandum, three out of five routes have similar travel times but slightly longer distances than existing trips. These were highlighted in yellow for Alternative 3. However, Alternative 4—despite showing comparable data—is flagged in red, suggesting a disadvantage that does not appear to be supported by the numbers.

When accurate measurements are applied, the relative efficiency of Alternative 4 improves further, undermining the color-coded implication that it is a less viable option.

Proximity to Homes: Alternative 3

WSB acknowledged on October 3, 2024, that Alternative 3 curves west and comes within 17 feet of existing homes. This realignment was made to partially align the route within city limits over a stretch of approximately seven blocks (one subdivision).

This proximity to homes raises several concerns:

- It would immediately trigger the need for **noise mitigation** per regulatory standards.
- It introduces **significant safety risks** for nearby families.
- These factors are **not fully addressed or acknowledged** in the Memorandum.

Growth and Annexation Areas

All route alternatives lie within the designated **growth area**. However:

- None are fully within the planned annexation area.
- Alternative 4, like Alternative 3, is centrally located in the middle of the future growth area, as shown on maps on pages 29 and 59.
- Unlike Alternative 3, Alternative 4 does not approach existing homes, preserving a buffer and avoiding the need to reduce the right-of-way.

These distinctions are material and contradict how the routes were rated in the report.

Route Ratings

Despite similar travel times and volume-to-capacity (V/C) outcomes, Alternative 3 is rated high, while Alternative 4 is rated low. This discrepancy is unexplained and may reflect selective emphasis rather than an objective scoring system.

Bikeability Considerations

The Memorandum initially stated that bikeability was **not a factor** in determining the preferred route (page 6). However, here, bikeability is **used to negatively differentiate** Alternative 4. This contradiction reinforces concerns about inconsistent evaluation criteria.

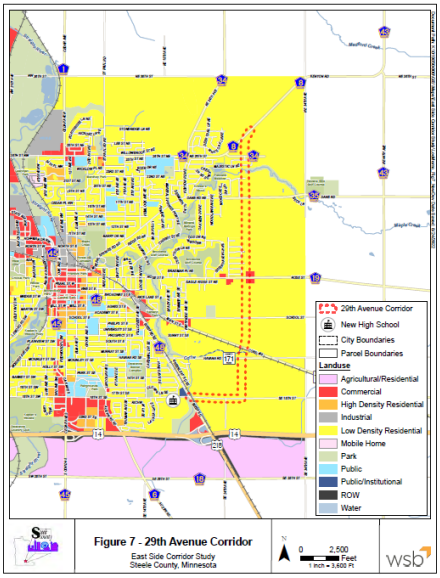
Alternative 3
This alternative rated either high or medium for all vehicle mobility measures. Relative to walkability and bikeability measures for which there are differences amongst alternatives, the alternative rated low for connections to existing trails. The majority of trips between origins and destinations would have shorter or similar travel times and distances when compared to existing trips. Alternative 3 would result in acceptable and improved volume/capacity (V/C) ratios on downtown roadways. This alternative is partially within existing city boundaries, and it is fully within the City of Owatonna's growth area boundary. While Alternative 3 only touches one current land use, it would connect several future land uses. This alternative does not connect to any existing city trails. It would connect to four planned trails, and would result in biking distances between origins and destinations of under three miles.

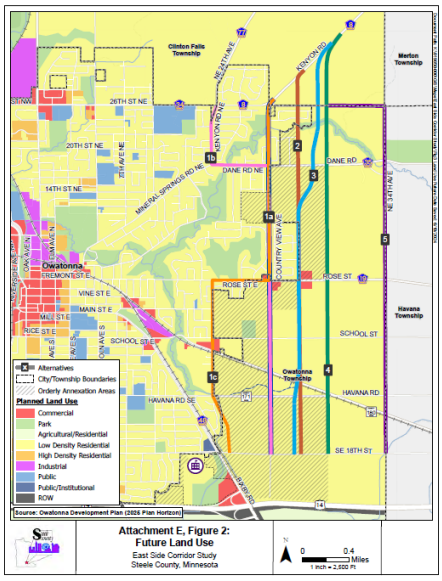
Alternative 4
This alternative rated low in multiple vehicle mobility measures, including trip length, distance, and travel time between origins and destinations; and the potential to support current and future land uses in proximity to the city's official boundary. The majority of trips between origins and destinations would have similar travel times but longer distances compared to existing trips. Alternative 4 would result in acceptable volume/capacity (V/C) ratios on downtown roadways. This alternative would not connect any developed land uses, is not within the existing city boundary, and is on the edge of the growth area boundary. Alternative 4 does not connect to any existing city trails but would connect to two planned trails. It would not result in biking distances between origins and destinations under three miles.

Conclusion for Page 8

When the data is accurately and consistently presented, Alternative 4 performs comparably—or in several cases better—than Alternative 3, particularly when residential impacts and long-term growth considerations are factored in. Yet, it was rated significantly lower without clear justification.

Page 29 and 59 Growth Maps:





Page 9: Alternative 4: Unjustified Exclusion and Evaluation Bias

Alternative 4, despite being statistically similar to Alternative 3, is rated significantly lower in the Memorandum. This raises concerns about inconsistencies in the evaluation process and the rationale used to eliminate it from further consideration.

Connectivity

According to page 61 of the Memorandum, Alternative 3 includes a planned $2.3 million noise wall, which would run along its only neighborhood connection. However, that same noise wall would physically obstruct access to the subdivision it claims to serve—North Country—rendering its connectivity similar to Alternative 4.

When access restrictions are factored in, the connectivity benefit assigned to Alternative 3 becomes questionable, and its rating appears overstated.

Land Use and Anticipated Growth Areas

Pages 29 and 59 of the Memorandum show that Alternative 4 lies within the center of the planned growth area, just like Alternative 3. Its location supports future development and aligns with city expansion goals.

Despite this, Alternative 4 is described as less favorable, without data to support how its placement within the growth boundary is meaningfully different from Alternative 3.

Bikeability

Page 6 of the Memorandum notes that bikeability was not used to determine preferred alternatives. Yet later sections selectively highlight this feature to down score Alternative 4. This contradiction undermines the objectivity of the evaluation process.

Volume-to-Capacity (V/C)

The Memorandum identifies meeting V/C goals as a key purpose-and-need criterion (criterion #2). Both Alternatives 3 and 4 meet this standard, yet only Alternative 3 receives favorable marks for doing so. This omission in the scoring for Alternative 4 distorts its overall performance in the matrix.

Cost Considerations

Alternative 4 avoids the need for both a $2.3 million noise wall and the $7.8 million urban road redesign required by Alternative 3. These savings represent a substantial cost difference. If Alternative 4 had been fairly evaluated, it would likely have been shown to be more cost-effective and less impactful to existing residents.

> In addition to the low ratings described above, both Alternatives 4 and 5 received low ratings for these vehicle mobility measures: 1) connectivity, and 2) land use and anticipated growth areas; and 3) distances between origins and destinations for bicycles. Alternative 5 also received low ratings for downtown congestion impacts and potential to support future land uses within and around the City of Owatonna's growth area boundary. For these reasons, Alternatives 4 and 5 were not carried forward for further analysis.

Summary of Findings

Alternative 4:

- Meets the same core criteria as Alternative 3
- Avoids proximity to residential homes
- Does not require a noise wall or costly urban design modifications
- Supports city growth within the mapped boundary
- Would likely be significantly less expensive

The exclusion of Alternative 4 from further study, despite its clear viability, raises questions about the integrity and transparency of the evaluation process.

Page 11: SEE Evaluation: Inconsistent Impact Ratings and Miscalculations

Table 2: SEE Impacts and Additional Considerations Performance Measures

	Category	Evaluation Criteria	Performance Measures	1A: New alignment approx. 2 mi east of CSAH 1/Cedar Ave/CSAH 45	1B: Modification of Alt 1 to include Kenyon Rd and Dane Rd N or Dane Rd	1C: Modification of Alt 1 to include route along E Rose St, Partridge Ave, and new alignment S of Rose St.	2: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45	3: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45, with deviations N of Rose St and S of CR 100
SEE Impacts	Wetlands	Potential impacts to resource	Acreage of wetland resources impacted (See **Attachment G**)	1.11	1.01	1.99	1.16	1.39
	Right of Way	Property impacts	Number of parcels affected	Parcels Affected - 98	Parcels Affected - 100	Parcels Affected - 126	Parcels Affected - 63	Parcels Affected - 60
			Permanent acres of property impacts	Perm - 43.25 Acres	Perm - 40.78 Acres	Perm - 32.1 Acres	Perm - 47.55 Acres	Perm - 56.08 Acres
			Number of residential and business relocations	35 residences 1 business	37 residences 1 business	49 residences 1 business	10 residences 0 businesses	0 residences or businesses
	Farmland	Potential impacts to farm resources (**Attachment H**)	Acreage impacts to all farmland	26.62	25.64	17.42	45.6	54.88
			Acreage impacts to prime farmland, prime farmland if drained, and farmland of statewide importance	Prime Farmland - 6.94 Acres Prime Farmland if Drained - 2.19 Acres Farmland of Statewide Importance - 0.56 Acres **TOTAL Impacts: 9.69 Acres**	Prime Farmland - 7.64 Acres Prime Farmland if Drained - 2.22 Acres Farmland of Statewide Importance - 0.13 Acres **TOTAL Impacts: 9.99 Acres**	Prime Farmland - 7.85 Acres Prime Farmland if Drained - 2.71 Acres Farmland of Statewide Importance - 0.53 Acres **TOTAL Impacts: 11.09 Acres**	Prime Farmland - 16.96 Acres Prime Farmland if Drained - 3.62 Acres Farmland of Statewide Importance - 1.60 Acres **TOTAL Impacts: 22.18 Acres**	Prime Farmland - 22.13 Acres Prime Farmland if Drained - 9.79 Acres Farmland of Statewide Importance - 1.25 Acres **TOTAL Impacts: 33.17 Acres**
			Number of farmland parcels potentially bisected	0	0	0	1	4
	Noise	Potential impact to noise receptors	Number and type of noise receptors potentially impacted*	Residential - 83 Parks - 1 Businesses - 2 **TOTAL: 86 Noise Receptors**	Residential - 135 Parks - 1 Businesses - 2 **TOTAL: 138 Noise Receptors**	Residential - 158 Parks - 1 Businesses - 3 **TOTAL: 162 Noise Receptors**	Residential - 30 **TOTAL: 30 Noise Receptors**	Residential - 27 **TOTAL: 27 Noise Receptors**
	Contaminated Properties	Impact to site with potential for hazardous materials	Number of impacted contaminated sites (in Minnesota Pollution Control Agency's What's In My Neighborhood database) (**See Attachment I**)	1	1	1	1	2
	Utilities	Potential to impact mapped facilities	Qualitative Assessment: Potential impact to mapped utilities	Medium Impact	Medium Impact	Medium Impact	Low Impact	Low Impact
	Floodplain	Potential impact to resource	Number of resources impacted (resource impacted and encroachment type for informational purposes only). (**See Attachment G**)	1: Maple Creek (Transverse)	1: Maple Creek (Transverse)	2: Maple Creek (Transverse) & Izaak Walton Creek (Transverse/Longitudinal)	1: Maple Creek (Transverse)	1: Maple Creek (Transverse)
			If applicable, number of feet of encroachment into floodplain	811	78 (An existing crossing on Dane Rd NE is in place at this location)	Maple Creek: 811 Izaak Walton (Transverse): 615 Izaak Walton (Longitudinal): 295	769	636
	Protected Species	Potential impact to federal threatened and endangered species	Species listed for the alternative corridor area based on the Information for Planning and Consultation (IPaC) tool	An IPaC report pulled for the East Side Corridor Study area showed numerous Federally endangered, proposed endangered, or candidate species (including mammals, birds, insects, and flowering plants). No critical habitats were identified within the study area. Bald eagles were identified as likely present within the project area. Numerous other bids were identified as warranting special attention in the project area. The IPaC tool is not detailed enough to specify meaningful differences amongst the alternatives under consideration. A more detailed Federal species review will be completed as part of the environmental review process completed for the preferred alternative.				
		Potential impact to areas of Biodiversity Significance	Areas of Biodiversity Significance potentially impacted (acres) (**See Attachment J**)	1.5	1.75	1.5	0.1	0.1
		Potential impact to DNR Native Plant Communities	Areas of DNR Native Plant Communities potentially impacted (acres) (**See Attachment J**)	1.5	1.75	1.5	0.1	0.1
Additional Considerations	Consistency with Local and Long-Term Plans	Consistency with local and long-term plans	Is the alternative consistent with the corridor vision articulated in local planning and development documents?**	Medium	Medium	Medium	High	High
	Estimated Project Costs	High-level estimate to construct alternative	Estimated project costs*** (**See Attachment K**)	$41.1M	$46.5M	$49.3M	$34.2M	$29.8M

Legend		
Low: >2 acres of impacts	Medium: 1-1.99 acres of impacts	High: < 1.0 acres of impacts
Low: 66+ parcels affected	Medium: 34-65 parcels affected	High:0-33 parcels affected
Low: 66+ acres of impacts	Medium: 34-65 acres of impacts	High: 0-33 acres of impacts
Low: Any residential or business relocations.	Medium: NA	High: 0 residential and business relocations.
Low: 66+ acres of impacts	Medium: 34-65 acres of impacts	High: 0-33 acres of impacts
Low: >40 acres of impacts to prime farmland and farmland of statewide importance	Medium: 20-40 acres of impacts to prime farmland and farmland of statewide importance	High: <20 acres of impacts to prime farmland and farmland of statewide importance
Low: >4 farmland parcels bisected	Medium: 1 -4 farmland parcels bisected	High: 0 farmland parcels bisected
Low: 100+ Noise Receptors	Medium: 51-100 Noise Receptors	High: 0-50 Noise Receptors
Low: >4 contaminated sites	Medium: 1-4 contaminated sites	High: 0 contaminated sites
Low: Relatively high level of development correlates to many in place utilities.	Medium: Relatively moderate level of development correlates to some in place utilities.	High: Relatively low level of development correlates to few in place utilities.
Low: 2 types of encroachment (transverse and longitudinal)	Medium: One type of encroachment (transverse or longitudinal)	High: No encroachment
Low: 800'+ of impacts	Medium: 700'-799' of impacts	High: < 699' of impacts
Low: NA	Medium: NA	High: NA
Low: 1.0+ acres of impacts	Medium: 0.5 - 0.99 acres of impacts	High: 0.0 - 0.49 acres of impacts
Low: 1.0+ acres of impacts	Medium: 0.5 - 0.99 acres of impacts	High: 0.0 - 0.49 acres of impacts
Low: Not consistent with corridor vision articulated in all approved, local planning and development documents**	Medium: Partially consistent with corridor vision articulated in all approved, local planning and development documents**	High: Consistent with corridor vision articulated in approved, local planning and development documents**
Low: Cost >$40M	Medium: Cost $30< + $39M	High: Cost <$30M

* Note: Included receptors within 250' of either side of alternative corridor. These numbers are for comparison only, and are not based on detailed noise analyses.
** Specifically the Steele County 2040 Transportation Plan; City of Owatonna 2040 Transportation Plan; and Owatonna 2006 Development Plan.
*** Note: Costs are based on a high level of conceptual design that is consistent with this stage of project development. Project costs will continue to change as additional project details become available, and based on current pricing conditions. Construction costs are subject to market related fluxuations that cannot be predicted

Residential and Business Impacts

The Memorandum lists 10 residential relocations for Alternative 2. However, this route runs adjacent to Hill Drive—a layout that appears no more disruptive than Alternatives 2 and 3 along North Country. The relocation counts for Alternative 2 may therefore be overstated.

For Alternative 3**,** the Memorandum claims no residential impacts. However, early layouts included the Larry Schultz homestead. If adjustments could be made to spare a single home, it raises the question: why couldn't similar efforts be applied to preserve entire neighborhoods?

Additionally, the North Country Subdivision owns the westernmost 50 feet of the mapped 150-foot right-of-way. This directly affects at least 18 residential properties—a fact not reflected in the document's relocation estimates. In reality, these homes would require relocation under standard design widths.

The attempt to reduce the corridor to a 100-foot footprint to avoid eminent domain introduces its own problems: reduced safety margins, proximity to homes, and long-term usability concerns. Fair comparisons using the full 150-foot corridor standard would have revealed significantly more residential relocation impacts for Alternatives 2 and 3.

Farmland Disruption

Alternative 4 follows some existing parcel lines**,** which reduces bisecting farmland and lowers disruption to agricultural operations. Other alternatives, with the exception of alternative 5, are less efficient in this regard and create more fragmented farmland.

Noise Receptors

The Memorandum lists 27 noise receptors for Alternative 3. However, this figure appears based on a 250-foot buffer. Within North Country alone, there are at least 35 receptors at 250 feet—and 39 when using MnDOT's standard 300-foot measurement (per Figure R1).

Nearby farmsteads would increase this number even further. Alternative 2, which follows a nearly identical path to Alternative 3, likely shares these impacts—but the numbers do not reflect that.

Figure R1 – North Country Subdivision Noise Receptors

Utility Impacts

Alternative 3 is listed as having low utility impact, which is inconsistent with on-the-ground realities. In North Country:

- Overhead utility lines lie 50 feet east of the west edge of the mapped right-of-way
- AT&T fiber optic lines run along the east side

Relocating these utilities would be both complex and expensive, with costs for the fiber lines alone potentially in the hundreds of thousands, according to county officials. These Costs are not included in the cost analysis on page 61.

Project Cost Discrepancies

- **Alternative 2** is rated as "low cost" at $34.2 million, though the Memorandum defines projects between $30–39 million as medium cost. This classification inconsistency reflects a pattern of imprecise data usage.
- **Alternative 3** has seen its costs more than double since project inception. It is listed in the STIP as an $8 million project. The cost of mitigation measures continues to rise without reassessment.

Notably, Alternative 4 would avoid both the $2.3 million noise wall and the $7.8 million urban road upgrade, offering major savings.

Additional Observations on SEE Analysis

A significant issue with the SEE evaluation is that Alternative 3 is being compressed into a smaller footprint, unlike other alternatives. This narrower design was used to avoid triggering eminent domain—but it introduces design compromises that other routes weren't subjected to. Evaluating Alternative 3 under a reduced standard, while holding Alternative 4 to full-width impacts, skews the comparison unfairly.

If Alternative 4 had been evaluated using the same modified criteria applied to Alternative 3, it likely would have demonstrated even lower impacts and costs. It would not require a $2.3 million noise wall or a $7.8 million urban roadway segment for a single subdivision. These mitigation expenses are unique to Alternative 3 and should have weighed more heavily in the final evaluation.

Yet, despite meeting the Memorandum's documented purpose-and-need criteria, Alternative 4 was excluded from further study. This exclusion prevented stakeholders and decision-makers from conducting a side-by-side comparison that may have changed the preferred route recommendation.

Concerns About Reliability and Data Integrity

These discrepancies—many of which are easily verified through public records and basic math—raise larger concerns. If simple elements like color coding, impact counts, and buffer zones contain inaccuracies, it's reasonable to question how much of the remaining analysis is similarly flawed or selectively framed.

One specific example involves the use of thresholds in data visualization. A floodplain encroachment of 636 feet is marked as "green" because WSB selected 699 feet as the cut-off. The proximity of these values—just below the threshold—suggests the metric may have been chosen to present the encroachment in a more favorable light.

This practice is troubling, particularly when:

- The Shady Hills subdivision, developed within this same floodplain, led to significant flooding in nearby areas.
- The risks of similar outcomes from this project remain unaddressed in the Memorandum.

Would encroaching 699 feet into a floodplain truly avoid adverse impacts, or does that threshold merely serve a convenient narrative?

Missed Environmental and Community Impacts

Beyond the concerns above, the SEE report fails to address several key impacts that are typically required in environmental reviews. These include:

- Environmental Justice
- Climate Change and Greenhouse Gas Emissions
- Archaeological and Historical Resources
- Construction Impacts
- Energy Use
- Visual Impacts
- Tax Base and Property Value Effects
- Air Quality
- Wildlife, Fisheries, and Protected Species
- Vegetation
- Floodplains, Hydrology, and Aquifer Impacts
- Health Impacts
- Socioeconomic Disparities
- Light Pollution

Summary of SEE Discrepancies

The SEE analysis appears skewed in favor of Alternative 3 by:

- Understating residential impacts
- Downplaying utility relocation costs
- Applying inconsistent cost thresholds
- Using noise receptor buffers below MnDOT standards
- Comparing routes under different design assumptions

If Alternative 4 had been evaluated on equal terms—with full width right-of-ways, accurate relocation counts, and real-world mitigation costs—it would likely have emerged as significantly less impactful and more cost-effective than Alternative 3.

If a project costing under $30 million is considered favorable, then a valid question remains: Would Alternative 4—if properly evaluated—have cost closer to $20 million? If so, would the benchmark for a “good value” remain fixed at $30 million?

In light of the inconsistencies, omissions, and selectively applied thresholds, stakeholders are justified in questioning whether the Memorandum truly reflects a neutral and comprehensive evaluation, or if it was structured to support a preselected outcome—a violation of the environmental process.

These inconsistencies call into question the overall accuracy and objectivity of the Memorandum's conclusions.

Page 15: SEE Summary: Unequal Treatment of Neighborhoods

Alternative 2, which runs adjacent to Hill Drive, is shown to require 10 residential relocations—a number acknowledged in the SEE analysis and seemingly used to justify rerouting that segment.

In sharp contrast, Alternative 3 relies on a mapped 150-foot-wide right-of-way that cuts directly through the North Country Subdivision, where homes have already been built. This right-of-way was officially mapped in 2000 (Doc: A280471), but the land was later developed with full city permits and no recorded objections or restrictions. Residents built legally and in good faith—never informed that their homes were on a corridor that would be reclaimed.

Despite this, the SEE analysis lists zero relocations for Alternative 3.

Meanwhile, Alternative 4, which runs adjacent to residential properties but does not encroach on residential land, is rated more negatively and was dismissed from further study.

The Memorandum statement "By Veering east, the segment of Alternative 3 north of Rose St avoids impacting the established neighborhood between Dane Rd and 26th St NE that Alternative 2 would go through" is key because it shows that WSB and Steele County made deliberate design choices to avoid one established neighborhood (Hill Drive), while failing to apply the same standard to North Country.

> While Alternative 2 scored similarly to Alternative 3 in many of the SEE categories and additional considerations, it would potentially result in the need for 10 residential relocations. By veering east, the segment of Alternative 3 north of Rose St avoids impacting the established neighborhood between Dane Rd and 26th St NE that Alternative 2 would go through.

The comparative logic applied here is inconsistent and difficult to justify.

Visual Evidence of Encroachment

Figure R2 clearly shows the officially mapped right-of-way overlapping with existing residential parcels in the North Country Subdivision. These are not future development sites—they are occupied homes. Yet the evaluation treats this encroachment as inconsequential, while simultaneously treating adjacent routing under Alternative 4 as a disqualifying factor.

At the same time, the Shady Hills Subdivision, which consists of undeveloped lots, appears to have received proactive protection through alignment shifts that preserved its future development space. No such adjustments were made for North Country residents, despite their properties being directly affected.

Figure R2: Officially Mapped Right of Way—Encroachment of North Country Subdivision

Implications of the Development Overlap

The decision to continue planning Alternative 3 implies that the county intends to build a high-speed road through a neighborhood that was legally permitted and developed, rather than adjusting the alignment or compensating impacted families.

This situation should require eminent domain, relocations, or a drastically reduced road footprint. However, instead of acknowledging this, the city and county are proposing to compress the corridor into just 100 feet because they cannot afford the cost of acquiring the developed land.

This places the burden of a funding shortfall on homeowners—forcing them to live just feet from a high-speed arterial without adequate buffer zones. It also introduces long-term safety concerns, design compromises, and degradation of quality of life, none of which are accounted for in the current evaluation.

By contrast, undeveloped lots in the Shady Hills subdivision were actively avoided in Alternative 2. More care was given to protecting future development than to mitigating harm to current residents.

Summary
The SEE analysis treats North Country as if it were undeveloped, despite the fact that the officially mapped corridor runs through existing residential properties**.** The failure to recognize, acknowledge, or mitigate this conflict reveals a serious inconsistency in how impacts were assigned and evaluated.

The result is a contradictory and inequitable assessment. If the goal of the Memorandum is to avoid or minimize residential impacts, then Alternative 4 should have remained under consideration while Alternative 3 should have triggered a more serious relocation count.

Page 17: Socioeconomic Disparities and Disproportionate Burden on Working-Class Families

Disproportionate Impacts on Working-Class Neighborhoods
The North Country Subdivision is located within a working-class neighborhood, built as part of the 2004 housing boom to address affordability and access. This area is home to numerous essential workers, multi-generational families, and residents with disabilities. Many homeowners in this subdivision live paycheck to paycheck, with limited capacity to absorb the disruption of relocation, construction, or prolonged uncertainty.

Yet, this community bears the most direct impact under Alternative 3—despite being the only route that requires a noise wall, encroaches on private residential property, and necessitates urban road modifications costing millions.

Although the proposed corridor is designed to be 150 feet of right-of-way, North Country residents own 50 feet of that corridor—land sold and permitted for housing after plans for the road were effectively abandoned in 2004. That year, the U.S. 14 Beltline Study recommended shifting the alignment to 34th Avenue (Alternative 5 today).

> A north-south corridor between 26th St NE and US 14 was officially mapped in 2000 based on a resolution passed by the Steele County Board of Commissioners on June 22, 1999. The official map depicts a right of way width of 150 feet (**Figure 1**).

Since then, homes were built with city approval on property no longer considered active right-of-way. Residents were told the road would not become a major highway. However, the current Memorandum classifies the route as a "major collector," confirming its highway-grade design.

> A new, north-south roadway on the east side of Owatonna would be owned and maintained by Steele County as a County State Aid Highway (CSAH), and would likely be classified as a major collector. The intent is for the new north-south roadway to connect to several collector roadways potentially including CSAH 8 (Kenyon Rd), CSAH 35 (Dane Rd), CSAH 19 (Rose St), and CR 180, along with several local roadways.

This deception—and the manner in which it's been handled— raises serious ethical and procedural questions.

Key Concerns Raised by Affected Residents:

Transparency

- Why haven't these facts been openly and honestly communicated to residents, elected officials, and the government?
- Why were homeowners allowed to build in this corridor?

Equal Treatment

- Why are these residents being asked to accept a compressed design while other properties and subdivisions were proactively avoided**?**
- Why wasn't Alternative 4 retained for further study, when it avoids this neighborhood entirely?

By Avoiding Eminent Domain, New Harms Are Introduced

To avoid property acquisition, planners reduced the design width to just 100 feet—bringing the highway within 17 feet of existing homes. This creates new and significant disparities:

Safety Concerns

- A high-speed corridor this close to occupied homes introduces clear risks.
- Yet, no formal safety study has been provided to assess the impact on nearby residents.

Property Devaluation

- No property value impact analysis has been conducted, despite the potential loss in home equity.

Socioeconomic Discrimination

- This neighborhood includes working-class families, individuals with disabilities, and those with limited means to fight back.
- Avoiding impact in more politically influential or undeveloped areas while compressing the design through North Country appears inequitable—and raises potential conflicts of interest**.**

Conclusion
Decisions of this scale must be rooted in honest communication, fair treatment, and thorough analysis. Before this highway is pushed within feet of homes that were built in good faith, the following must occur:

- Full evaluation of less harmful alternatives
- The corridor's history must be transparently acknowledged
- Independent analysis of safety and economic impacts should be conducted

Residents of North Country deserve the same level of protection and due process as any other community.

Page 18: The Mapped Right-of-Way: Abandonment, Reuse, and Legal Conflicts

The Legality and History of the Right-of-Way

Figure 1 from the Memorandum depicts the "Officially Mapped Corridor" officially filed in 2000 as a 150-foot-wide right-of-way, in today's footprint. At the time, the land was largely undeveloped and reserved on paper for potential future use. On March 9, 2004, a Joint Powers Agreement between the City of Owatonna and Steele County was signed. This agreement gave both entities:

- First right of refusal on development within the corridor,
- The ability to purchase property, and
- A six-month window to delay or contest development on any affected parcels.

In August 2004, just five months later, the U.S. 14 Beltline Study formally recommended routing the corridor along 34th Avenue (Alternative 5) instead. This marked a turning point. The original 150' corridor was effectively abandoned in practice—but not officially vacated.

Despite having legal tools to prevent conflict, the first home was built within the mapped corridor just six months after the Joint Powers Agreement was signed, and no contest or purchase attempt was made. Over time, a fully developed residential neighborhood—North Country Subdivision—emerged along the corridor.

Steele County and the City of Owatonna, did not retain easement rights, nor did it file legal claims to preserve the corridor through North Country. In fact, the county formally mapped 34th Avenue (Alternative 5) in 2009 as the replacement route. The city did not purchase the outlots until 2018—after years of foreclosure and conveniently timed with the reemergence of East Side Corridor planning efforts.

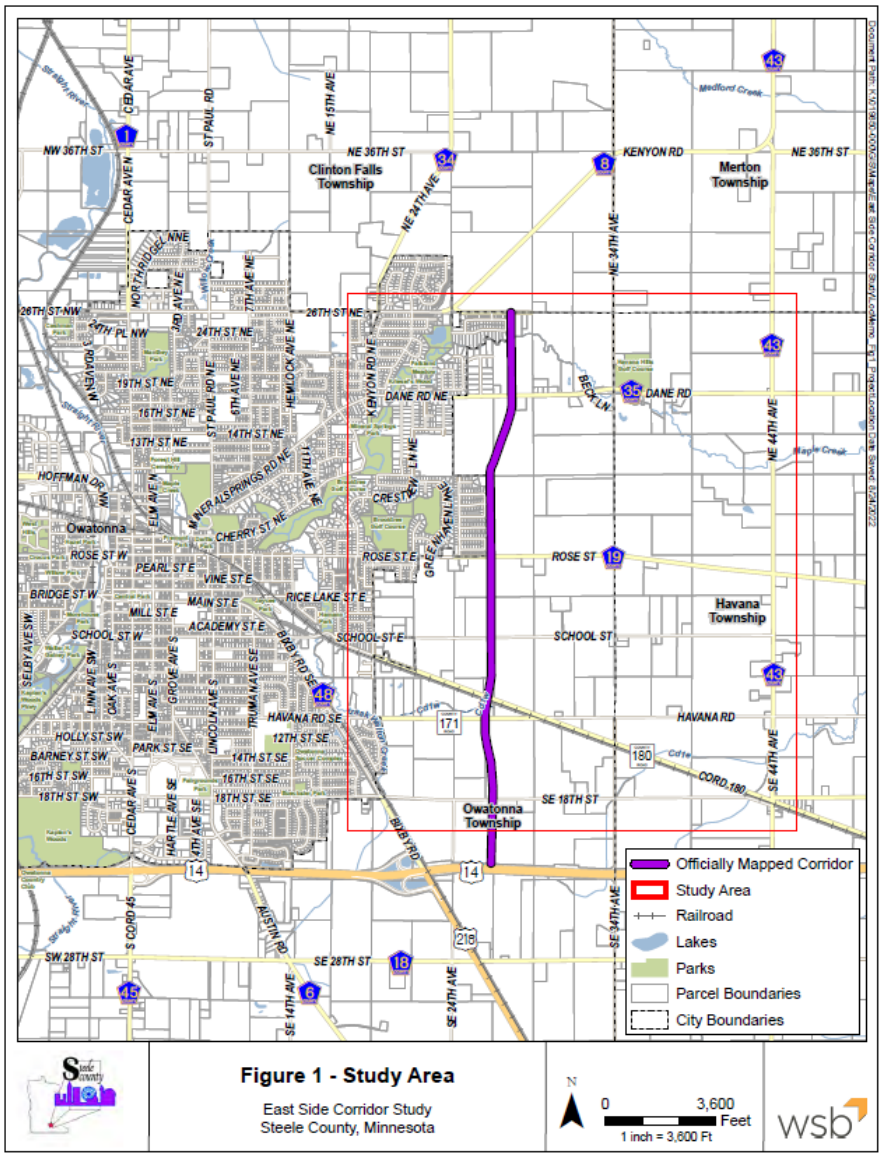
Today, 50 feet of the 150-foot-wide corridor runs through these private, occupied properties. Yet no formal relocation plans, compensation offers, or mitigation strategies have been proposed.

Legal and Ethical Concerns

The Memorandum treats this area as if it remains an active corridor, despite the fact that:

- No right-of-way was recorded or preserved,
- Residents hold legal title to portions of the route,
- And no compensation or eminent domain process has been initiated.

Attempting to reassert use of this land without legal proceedings may conflict with property law and raises serious liability risks for both the city, county, and state.



Internal Awareness—And Withholding of Critical Information

The seriousness of this situation was not publicly acknowledged until November 2023, when North Country residents raised the issue during public comment. Until that moment, County Engineer Greg Ilkka was unaware that the corridor directly overlapped with private homes.

However, the then Assistant County Engineer, Paul Sponholz—who serves as the project lead— had access to the data and mapping that confirmed this direct encroachment. Despite this, he did not disclose the information to the public or to elected officials. Instead:

- He offered assurances that the project would run adjacent to, not through, residential properties;
- He downplayed impacts and stated that mitigation measures such as noise walls were unnecessary;
- He collaborated with WSB to shift publicly released maps 25 feet east—not to change the actual alignment, but to visually reduce perceived impacts on North Country homes.

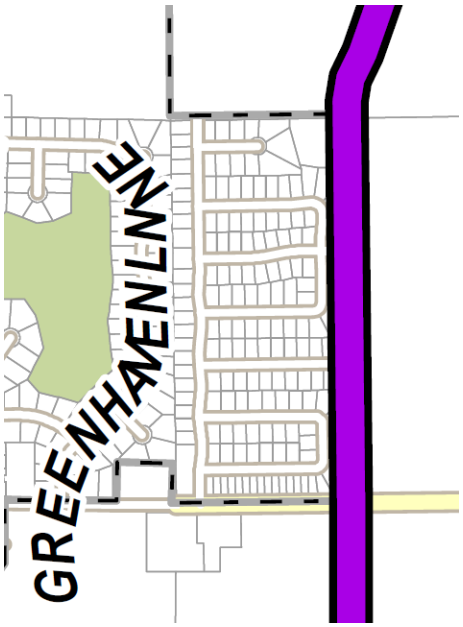
This pattern of omission and misrepresentation undermines the transparency, integrity, and credibility of the entire planning process.

Why This Matters

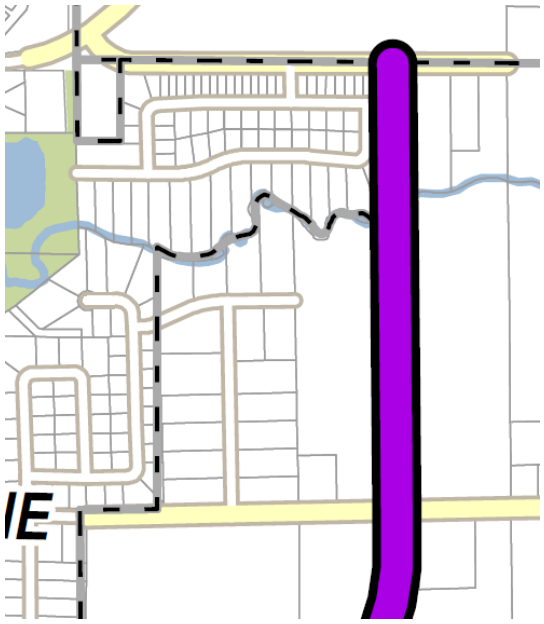
Public agencies are entrusted to act with transparency and prioritize the safety and well-being of residents. In this case:

- The County relinquished its corridor rights in 2004, allowing legal development of homes now directly affected by the project;
- Today's leadership has not fully disclosed these implications to the public or elected officials.

This is more than a technical oversight—it suggests potential negligence, possible misconduct, and certainly a failure of ethical governance.



A closer examination clearly reveals the encroachment affecting North Country residents.



Similar encroachment is observed in the Shady Hills Subdivision, though it involves undeveloped lots.

Unequal Protections: A Tale of Two Neighborhoods

The images below reveal a stark contrast. In Shady Hills, a more affluent subdivision, the route was shifted to protect future development. In North Country—where working-class families already live—no such effort was made. Homes were legally built after the county abandoned the idea of this location, proposed a highway within feet of homes.

This unequal treatment raises serious concerns about transparency, fairness, and the values guiding public decisions. It reinforces existing social and economic divides—and leaves residents wondering if this document fairly evaluated alternative or was written to uphold a predetermined plan.

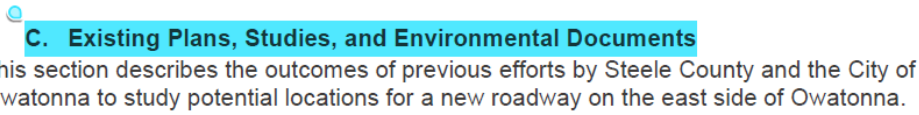
While the corridor still appears on maps, its legitimacy has eroded. Years of abandonment, approved development, and omission of key facts from the Memorandum undermine its legal and ethical standing. Reviving it now risks violating property rights and public trust.

Reviving a corridor through private property that was sold and developed in good faith more than 20 years ago undermines basic legal principles. It violates the public trust and may expose local and state agencies to legal and financial consequences.

Page 19: Past studies

Residents have long pointed to previous Beltline studies to highlight inconsistencies with the current East Side Corridor proposal. In response, officials often claim that past reports no longer apply because "this is a new project with a new purpose."

Yet, the Memorandum selectively relies on those same past studies to justify its current alignment, while ignoring inconvenient findings.



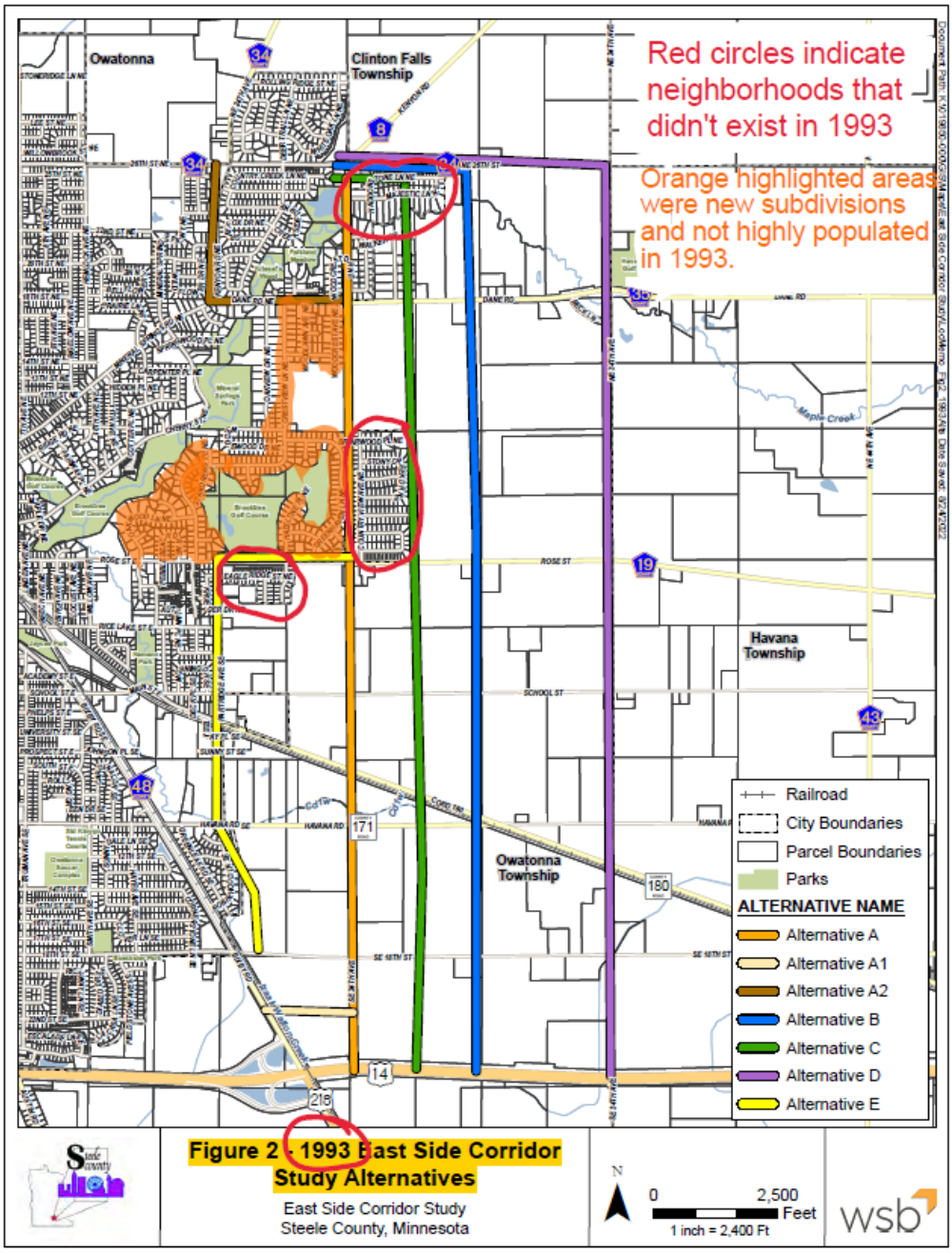
C. Existing Plans, Studies, and Environmental Documents

This section describes the outcomes of previous efforts by Steele County and the City of Owatonna to study potential locations for a new roadway on the east side of Owatonna.

One clear example is the Memorandum's use of *Figure 2*, which is labeled as representing alternatives from 1993. However, the map reflects today's footprint, not the 1993 alignment. This creates a misleading impression that the route was approved decades ago with full awareness of subdivisions that did not yet exist.

1. **Owatonna East Side Corridor Study (1993)**

This study, conducted by the City of Owatonna and Steele County, examined several location alternatives for an east side corridor (**Figure 2**). The primary need for the new roadway was



Figures R3 and R4 (below) show what Owatonna actually looked like in the 1990s.

1995 EA, Page 9: Alternatives Reflective of the 1993 Time Period

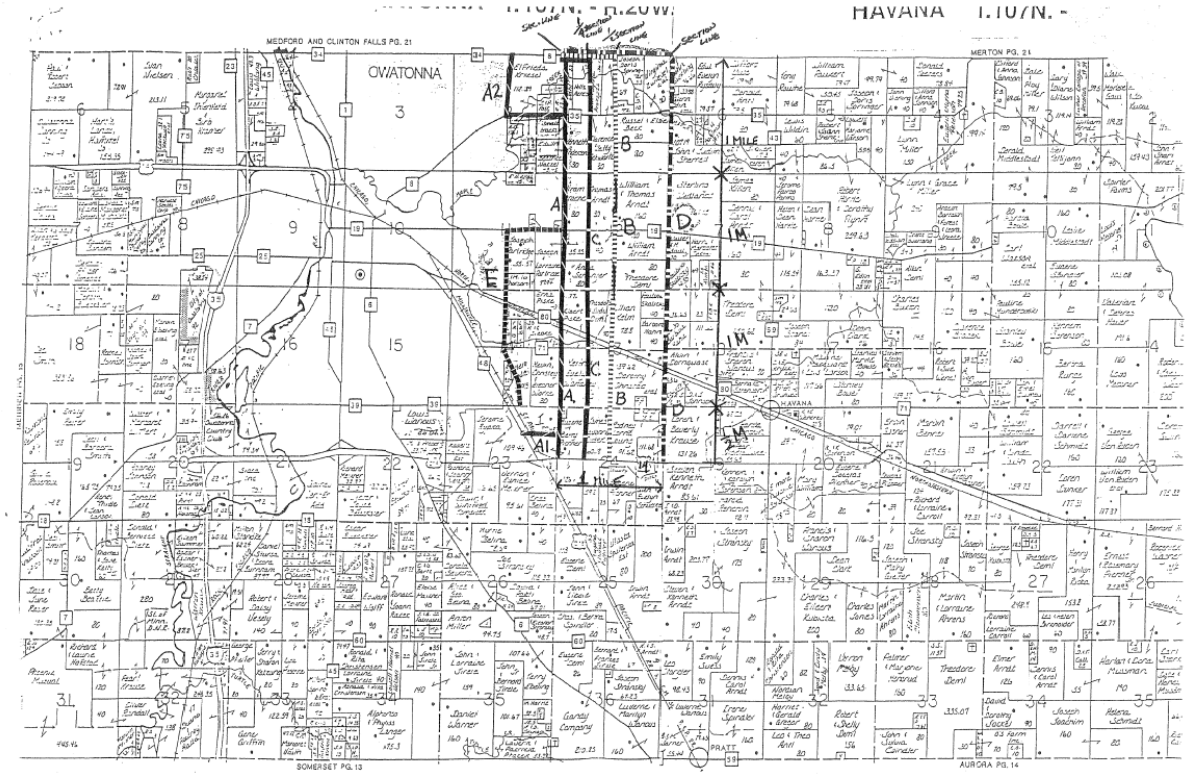


Figure R3: Maps the original 1990s alternatives, all located outside current city limits.

Figure R4: Shows the 1995 landscape; most subdivisions now being impacted—including Greenhaven—were not yet built (red pin marks a current home location).

The Memorandum also mischaracterizes 24th Avenue. On page 3, it states that the corridor is "similar" to the current mapped right-of-way. In reality, 24th Avenue—referred to as Alternative A in the 1990s (Alternative 1 today)—was rejected in the 1995 Environmental Assessment and 1999 EAW due to its proximity to homes and associated noise impacts, the very same impacts today.

As a result, the route was shifted 1,200 feet east—toward what is now Alternative C (Alternative 3/29th Avenue)—and officially mapped in 2000. Despite this, the Memorandum claims 24th Avenue was part of the mapped right-of-way, contradicting the historical record.

> The furthest west of these alignments was Alternative A, which is immediately east of US 218 or along the section line generally aligned with 24th Avenue East. The furthest east (Alternative D) was located at 34th Avenue East, one mile east of Alternative A. Alternative A was selected as the preferred alternative for the 1993 study because it would provide the most immediate benefit to traffic due to its proximity to existing developed areas.
>
> Alternative C most closely matches the officially mapped corridor. The 1993 study outlined several advantages and disadvantages of Alternative C, listed below. Note that several items such as the connection to US 14 are no longer applicable.

Disadvantages to Alternative C: The Memorandum omits 2 additional disadvantages, including deviations around Echo Heights, as seen on official copies of the 1993 report on page 5, shown in Figure R5.

Disadvantages:

1. No existing right of way on north/south segment.
2. Cuts through Schlinger farm.
3. Cuts through 160-acre Wandry farm.
4. Possible wetlands in section 12.
5. Possible conflict with radio tower, may require some adjustment in alignment.
6. Connection to US 14 would be closer to interchange and would require MnDOT permission.

Memorandum Page 16

DISADVANTAGES:

1. No existing right-of-way on north/south segment.
2. Cuts through Schlinger farm.
3. Cuts through 160 Ac. Wandry farm.
4. Possible wetlands in section 12.
5. Possible conflict with radio tower, may require some adjustment in alignment.
6. Connection to T.H. 14 would be closer to interchange and would require MNDOT permission.

7. REQUIRES SOME realignment around Echo Heights houses.

8. SKIRTS A WETLANDS AREA.

Figure R5 – Alternative C Disadvantages from 1993 Study

These discrepancies point to a troubling pattern: selective reliance on historical data when it supports the current plan, and dismissal of that same data when it raises legitimate concerns.

Page 21: 1995 Environmental Assessment (EA)

The 1995 Environmental Assessment (EA) narrowed the project to two corridors—Alternative A and Alternative C—as seen in the conclusions section on page 85 of the 1995 EA (Figure R6). Contrary to the Memorandum's claim that no preferred alignment was identified, these two routes were explicitly carried forward to the 1999 EAW.

Conclusions

The projected growth in the City of Owatonna and Owatonna Township's east side will definitely result in capacity problems on existing City streets if no east side corridor is constructed. The distance of the corridor from existing City boundaries has a distinct impact on the level to which the corridor can relieve projected traffic growth on existing City streets.

Alternatives A and C are superior to Alternatives B and D in their ability to serve projected and existing development and route traffic away from the use of Mineral Springs Road, Rose Street and the downtown area.

Figure R6 – Conclusions section of the 1995 Environmental Assessment

This Memorandum asserts that Alternative C would not impact native prairie. However, page 49 of the 1995 EA highlights significant concerns raised by the Minnesota Department of Natural Resources (DNR) about the contiguous native prairie habitat along County Road 80. Figure R7 illustrates the DNR's concerns regarding this habitat, while Figure R8 confirms that the wetlands affected by this project include vegetation classified as wet prairie.

According to the 1995 plat maps (Figure R9), what is referred to today as County Road 180 or Claremont Road was previously known as County Road 80. Additionally, Figure R10 demonstrates that the native prairie habitat not only runs directly through every proposed corridor but also extends beyond the study area.

In contrast to the claims in this Memorandum, the documentation from the 1995 EA clearly shows that Alternative C does, in fact, affect native prairie habitat.

As I indicated to you on the telephone earlier today, we are very concerned about perpetuation of these rare native species by maintaining native habitats in which they occur. In addition to the location of rare plants on your print-out, we have records for several threatened and rare plant species along County Road 80 east of the project area depicted on your map. There is continuous native prairie habitat along this road. The DNR Roadside Coordinator, Cathy Fouchi, surveyed a portion of the County Road 80 right-of-way on June 2, 1994 and confirmed that several rare plants still occur in the prairie remnants. During the preliminary planning stages of the Owatonna East Corridor, special consideration should be given to protecting any mesic native prairie remnants, which may support these listed and rare species. I recommend that you contact Cathy Fouchi in New Ulm at 507/359-6034 to coordinate protection planning efforts.

Figure R7 – Page 49 of the 1995 EA report detailing the DNR's concerns about prairie habitat.

Wetlands along the DME railroad and C.R. 80 right-of-ways are classified as palustrine emergent with seasonal flooding. The vegetation type is wet prairie.

Figure R8 – Page 40 of the 1995 EA report documenting wet prairie vegetation along County Road 80.

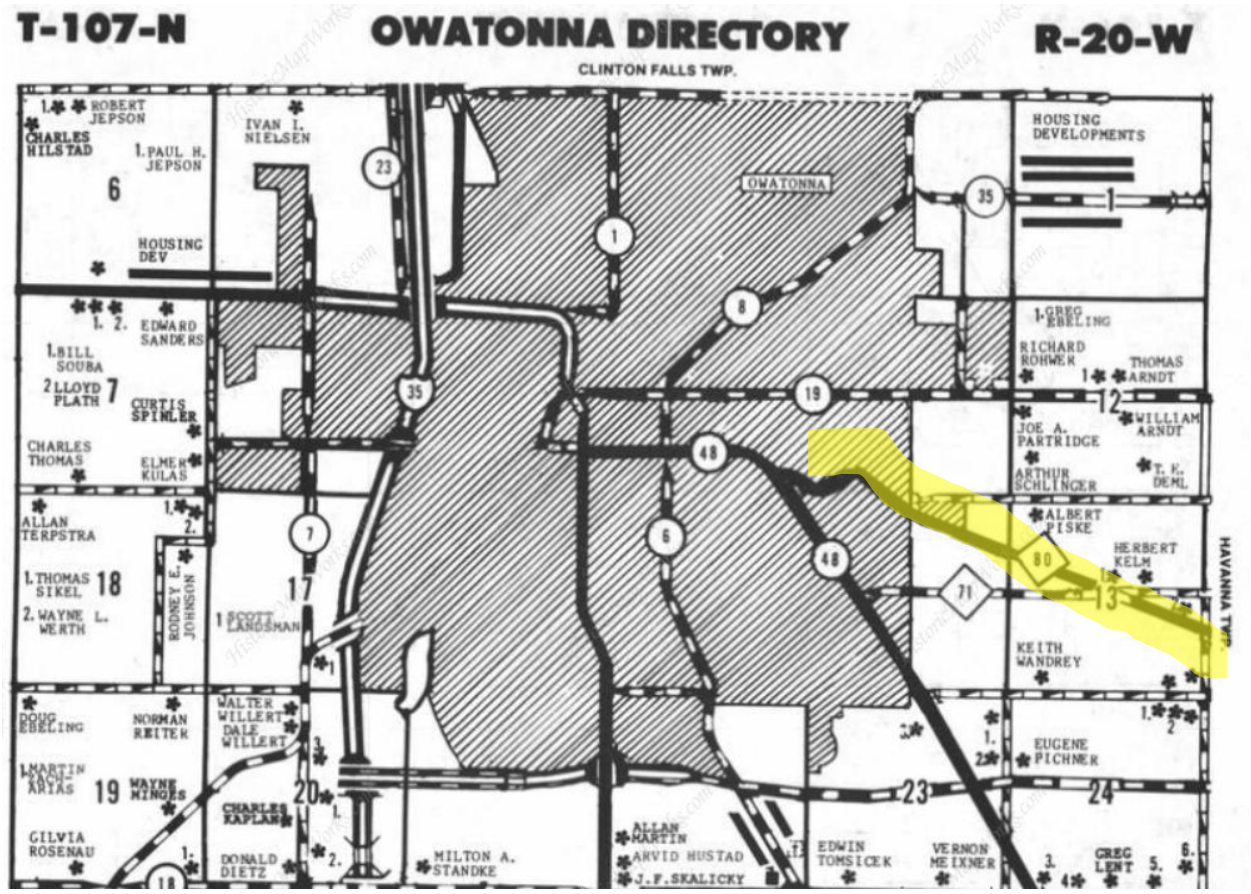


Figure R9 – 1995 Plat Map highlighting County Road 80.

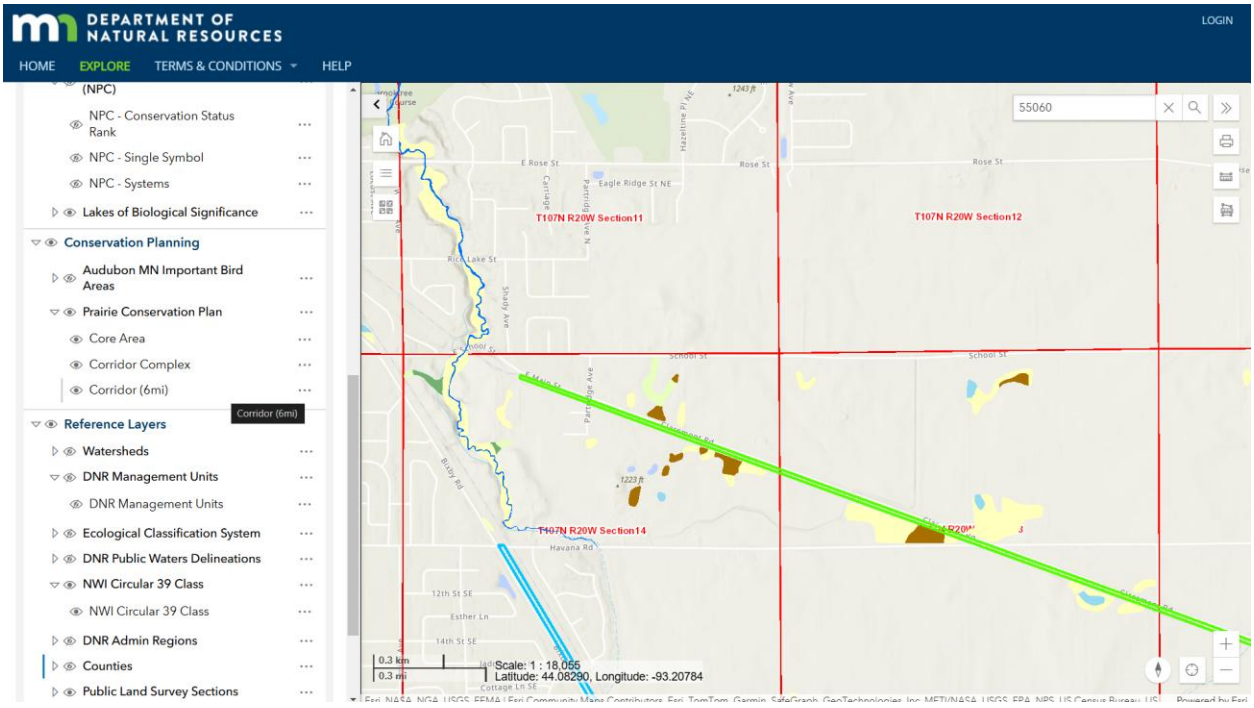


Figure R10 - MN DNR map of prairie wetlands along County Road 180/80.

The Memorandum references an October 18, 1994 meeting as context for route elimination. However, no documentation of this meeting has been made publicly available. When closed-door discussions influence long-term infrastructure decisions, transparency becomes not just ethical—but essential. Why wasn't this documentation made public like other historical reports?

> A public information meeting was held on August 30, 1994. Staff from the Minnesota Department of Natural Resources (DNR), Minnesota Department of Transportation (MnDOT), and the U.S. Soil Conservation Service (SCS) also met on October 18, 1994, to discuss the potential natural resource implications of the project.

While Alternative C was the closest to today's Alternative 3 in following the ¼ section line, the 1995 EA found that it would impact homes on Hill Drive—the only established neighborhood along the route at the time (Figure R11). To mitigate those impacts, the alignment was shifted east, creating a buffer of approximately 1,200 feet from existing homes along the rest of the route.

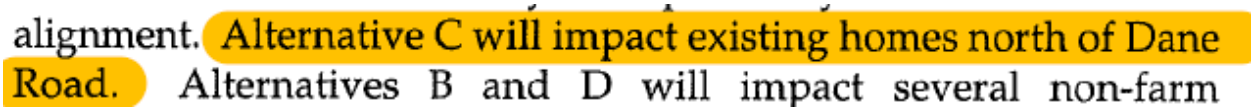

alignment. Alternative C will impact existing homes north of Dane Road. Alternatives B and D will impact several non-farm

Figure R11 – 1995 EA, page 18, noting the impact to existing residents on Hill Drive.

The 1995 EA also examined noise impacts from Alternative A on Greenhaven Lane, which was in the earliest stages of development. As shown in Figure R12, Alternative C was projected to carry nearly as much traffic but with significantly fewer residential impacts—leading to its recommendation over Alternative A.

Notably, this recommendation was based on a neighborhood that was little more than platted at the time. Today, the same concerns apply: the impacts of Alternative A then, closely resemble those of today's Alternative 3 (29th Avenue), while Alternative C aligns more closely with today's Alternative 4, offering similar protective buffers.

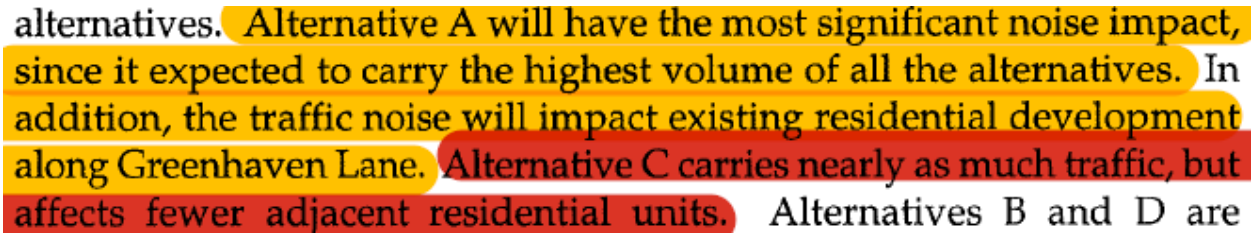

alternatives. Alternative A will have the most significant noise impact, since it expected to carry the highest volume of all the alternatives. In addition, the traffic noise will impact existing residential development along Greenhaven Lane. Alternative C carries nearly as much traffic, but affects fewer adjacent residential units. Alternatives B and D are

Figure R12 – 1995 EA, page 33, noting the residential impacts of routes located too close to residential properties.

The Memorandum does not provide Average Daily Traffic (ADT) projections for any of the proposed routes. While it discusses potential reductions in downtown congestion, no route-specific traffic data has been shared with residents. Instead, the public has been told to expect approximately 5,000 vehicles per day—without any supporting documentation.

This figure sharply contrasts with the 1995 EA, which projected up to 12,000 vehicles per day between Dane Road and Rose Street (Figure R13). Since then, both population and development have grown significantly, making it difficult to reconcile how current volumes would be less than half of what was estimated 30 years ago.

Alternative A itself is expected to have an ADT volume ranging from 3200 just north of T.H. 14 to over 12,000 between Dane Road and Rose Street.

The projected ADT volumes on Alternative C range from 2600 just north of T.H. 14 to over 12,000 between Dane Road and Rose Street.

Figure R13 – 1995 EA, pages 15 and 18, showing ADT estimates.

The 1995 EA included clear recommendations to protect surrounding neighborhoods. As shown in Figure R14, these included: “Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation.” The EA also emphasized creating safety buffers and adding landscaping between homes and the corridor.

At the time, this guidance could have been followed with minimal impact—since subdivisions like North Country and Shady Hills had not yet been developed. Today, those same areas are built out, yet the mapped right-of-way remains unchanged. Instead of acquiring or relocating affected properties, Steele County and the City of Owatonna are moving forward with plans to place a high-speed road within feet of existing homes.

For over two years, residents have stressed the importance of a safety buffer for a successful project, highlighting the dangers of relying on outdated 30-year-old plans that fail to reflect current realities.

Mitigation utilizing enhancement involves selecting feasible and effective "viewshed" considerations for the existing corridor area. The natural harmony, cultural order, and sense of design quality are all important elements.

Mitigation and Enhancement Techniques for Impacts to the Sense of Natural Harmony

- C Allow continued views of open and farmed areas outside of planned development areas;
- C Develop a landscaping plan to integrate the roadway into the surrounding natural and cultural environment;
- C Incorporate proper construction design to achieve the most visually acceptable and functional method for the roadway facility.

Mitigation and Enhancement Techniques for Impacts to the Sense of Cultural Order

- C Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation;
- C Investigate integrated pedestrian areas which will not disrupt use of existing neighboring properties but provide a pleasing, safe passage throughout the project area;
- C Appurtenances, all the non-structural items which are part of the roadway, should be visually coordinated and standardized. This includes signs, rails, fences, wall, berms, lights (if necessary), safety barriers, etc..

Mitigation and Enhancement Techniques for Impacts to the Sense of Design Quality

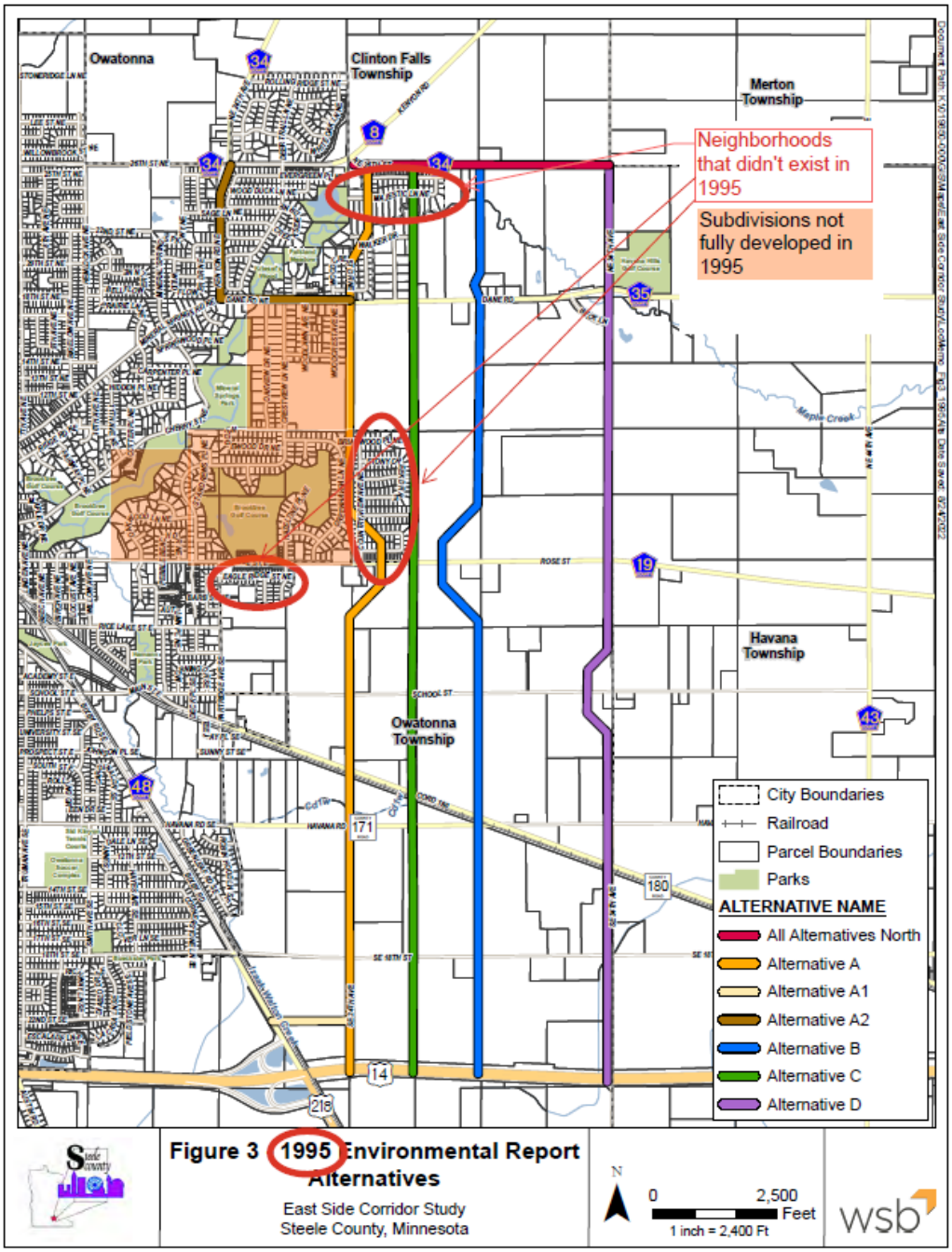
- C Provide a well-defined roadway surface showing continuous horizontal direction and movement;
- C Integrate a landscape plan that is functional and provides a connection in the project corridor;
- C Maple Creek Bridge. This is a key visual resource. The design and construction of the bridge should have features that are sensitive to the local natural and cultural environment. This includes design type, building materials, and colors.

Figure R14 – 1995 EA recommendations for a successful project, as seen on page 28.

Page 22: Inaccurate Landscape Representation and Misleading Data

Page 22 features another map—similar to that on page 20—that inaccurately depicts all alternatives using today's landscape rather than conditions from 1995. These visuals falsely imply that subdivisions now in place existed at the time of decision-making.

This misrepresentation distorts how alternatives were evaluated and misleads readers into believing current developments were part of the original analysis. By presenting modern data as if it informed historic decisions, the Memorandum gives a false sense of due diligence and undermines public trust in the process.



Page 23: 1999 EAW

The 1999 Environmental Assessment Worksheet (EAW) acknowledged that shifting the corridor too far east would reduce its benefits. Still, it explicitly recommended an 800-foot setback and a 150-foot right-of-way to protect existing subdivisions from noise impacts (Figure R15). These figures were not arbitrary—they were selected to comply with Minnesota's noise pollution regulations. This information was omitted from the Memorandum, despite the public addressing it many times.

The design speed of the roadway and the amount of truck traffic will be the most important factors in whether or not he adjacent sensitive receptors will experience noise levels exceeding state and federal standards. The proposed roadway is planned to be separated form existing residences by approximately 800 feet. Landscaped boulevards and berms provide a soft, absorptive surface which helps reduce the amount of noise which reaches the sensitive receptors. The 150 foot right-of-way anticipated for this corridor will provide adequate space to design these absorptive surfaces if necessary.

Figure R15 – Page 11 of the 1999 EAW, highlighting the necessary avoidance measures to prevent noise impacts.

Noise Regulations

The recommended 800-foot setback and 150-foot right-of-way were not arbitrary—they were purposefully selected to reduce noise exposure for nearby residents. In the 1990s, project consultants followed the regulatory principle of "avoid, minimize, mitigate," placing resident safety at the forefront. Today, Minnesota Rule Chapter 7030: Noise Pollution Control serves as a benchmark for appropriate separation between roadways and homes. As shown in Figure R16, municipalities are legally responsible for preventing land use decisions that would result in immediate noise violations.

7030.0030 NOISE CONTROL REQUIREMENT.

No person may violate the standards established in part 7030.0040, unless exempted by Minnesota Statutes, section 116.07, subdivision 2a. Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use.

Figure R16 – Minnesota Noise Pollution Rules: https://www.revisor.mn.gov/rules/7030.0030/

Minnesota Rule 7030.0050 classifies homes, schools, and hospitals as Noise Area Classification 1, where noise cannot exceed 65 dBA for more than 10 minutes per hour or 60 dBA for more than 30 minutes per hour during the day. Nighttime limits are even stricter, set at 55 dBA and 50 dBA, respectively (Figure R17), due to the well-documented health risks of disrupted sleep and prolonged exposure.

Highways—especially truck routes like the proposed East Side Corridor—often exceed 90 dBA, far surpassing legal thresholds. Even typical road noise averages around 70 dBA, which is still above regulatory limits. This is precisely why 1990s consultants placed the corridor over 800 feet from existing homes—a critical buffer now being disregarded, despite repeated concerns raised by residents.

7030.0040 NOISE STANDARDS.

Subpart 1. **Scope.** These standards describe the limiting levels of sound established on the basis of present knowledge for the preservation of public health and welfare. These standards are consistent with speech, sleep, annoyance, and hearing conservation requirements for receivers within areas grouped according to land activities by the noise area classification (NAC) system established in part 7030.0050. However, these standards do not, by themselves, identify the limiting levels of impulsive noise needed for the preservation of public health and welfare. Noise standards in subpart 2 apply to all sources.

Subp. 2. **Noise standards.**

Noise Area Classification	Daytime		Nighttime	
	L_{50}	L_{10}	L_{50}	L_{10}
1	60	65	50	55

Figure R17 – Minnesota Maximum Noise Regulations: https://www.revisor.mn.gov/rules/7030.0040/

Why 800ft?

Figure R18 outlines vehicle classifications over 10,000 pounds—including semi-trucks, school buses, garbage trucks, delivery vehicles, construction equipment, and emergency responders. These heavy vehicles are major contributors to roadway noise, particularly along designated truck routes like the proposed East Side Corridor.

Figure R19, based on MN Rule 7030.1040, shows noise limits for vehicles over 10,000 pounds**,** with Line A applying to those traveling above 35 mph. Even if the road is built at the far edge of a 100-foot right-of-way—leaving just 50 feet of separation—noise levels would still exceed 90 dBA. According to the chart, levels drop to the daytime legal limit of 65 dBA only at distances near 800 feet. This indicates that effective noise mitigation for truck traffic requires setbacks greater than 800 feet.

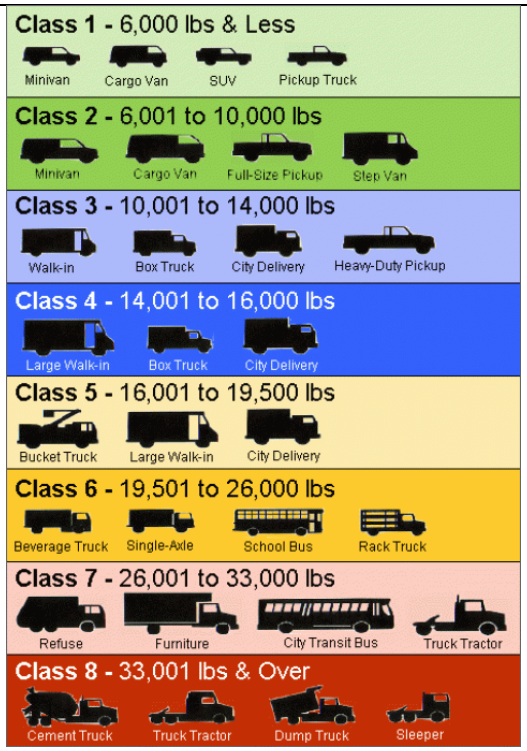


Figure R18 – Vehicle Classifications per the federal Government

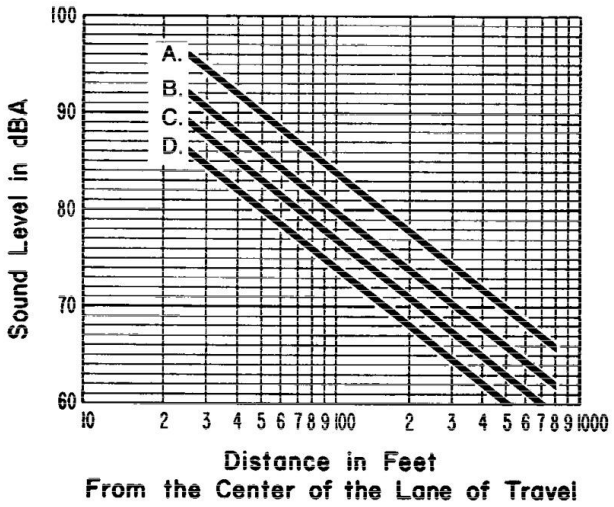


Figure R19 – Noise limits for vehicles over 10,000lbs
https://www.revisor.mn.gov/rules/7030.1040/

How many trucks per hour would exceed the 6-minute noise limit?

At 55 mph, the noise from a single truck lasts roughly one minute before dropping below safe levels. That means just six trucks or buses per hour would exceed the 6-minute exposure limit set by noise standards.

With an Average Daily Traffic (ADT) estimate of 5,000 vehicles and 2.8% classified as trucks, this threshold is already exceeded. Using historical traffic data—closer to 13,000 vehicles per day with 1.1% truck traffic—the limit is still surpassed.

Both scenarios fall short of the quoted 5–15% truck traffic and demonstrate that current setbacks are insufficient. To meet the 65 dBA daytime and even stricter 55 dBA nighttime standards, either truck volumes must be substantially reduced, or setbacks must exceed 800 feet.

What about other vehicles?

Noise concerns extend beyond trucks. Motorcycles and passenger cars also contribute significantly to cumulative exposure.

Figure R20 (Chapter 7030.1050) shows that motorcycles traveling 35 mph or faster can generate up to 90 dBA at a 35-foot setback. At 800 feet, those levels drop to a safer 60 dBA, within daytime legal limits.

Figure R21 shows that even standard vehicles, like personal cars, can exceed noise limits unless a 300-foot buffer is maintained.

With an ADT of 5,000 cars per day, evenly spaced, that's one vehicle every 17 seconds. A car traveling 600 feet at 40 mph takes about 10 seconds, meaning that at least 280 vehicles per hour would generate overlapping noise events.

In effect, passenger vehicles alone would push noise exposure beyond the 30-minute legal threshold, even without truck traffic.

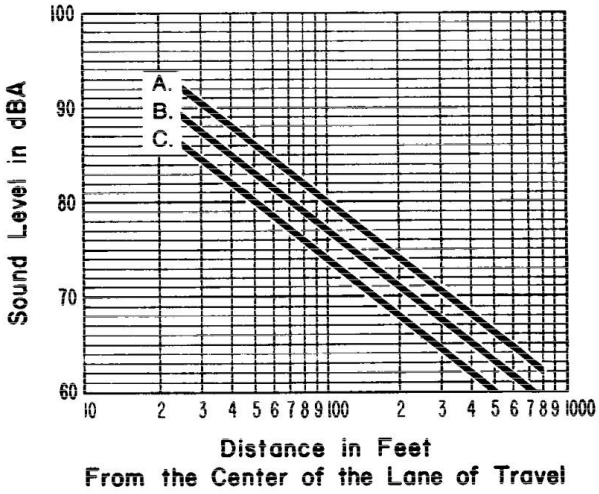


Figure R20 – Noise limits for Motorcycles
https://www.revisor.mn.gov/rules/7030.1050/

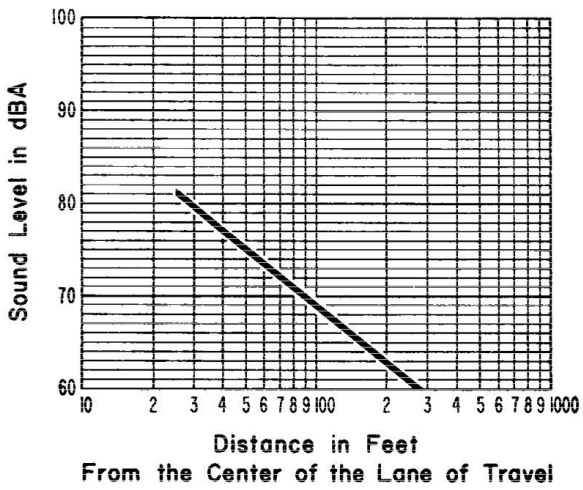


Figure R21 – Noise limits for other vehicles
https://www.revisor.mn.gov/rules/7030.1060/

These findings underscore the importance of aligning the corridor's design with existing noise regulations and maintaining adequate setbacks—especially given its designation as a truck route.

How Noise Affects Outcomes

The health risks of road noise are well-documented—from heart disease and cognitive delays to mental health challenges. These are preventable harms, and setbacks were designed to avoid them. The 800-foot buffer appears to reflect a balanced compromise: offering protection from truck noise (which may require over 1,000 feet) and vehicle traffic (which may require 300 feet), with a focus on public health.

Avoidance remains the most cost-effective and equitable solution. Ignoring these standards now—when communities were protected by them decades ago—leaves today's residents unfairly exposed.

Visual Impact Assessment (VIA)

The 1999 EAW (p.12) concluded that visual impacts, like glare from headlights and streetlights, would not be a concern because the route was set 800 feet from existing residences. This finding came from a Visual Impact Assessment (VIA) conducted during the 1995 Environmental Assessment (see Figure R14

above), which helped confirm the selected alignment. The VIA specifically recommended avoiding proximity to subdivisions, further supporting the need for a route that maintains distance from homes.

Expert Opinions

Page 23 of the current Memorandum briefly references agency concerns—but downplays their seriousness. As detailed on page 25 of the 1995 EAW, the Department of Natural Resources (DNR) warned that the proposed alignment conflicted with Steele County's water plan and posed risks to wildlife and wetlands—concerns that were ultimately dismissed.

The Minnesota Historical Society also raised major concerns, identifying two likely burial sites and warning of disturbance near Maple Creek. To avoid damaging culturally significant areas, the Society recommended limiting construction to locations previously disturbed by roadwork—such as the 34th Avenue corridor (Alternative 5).

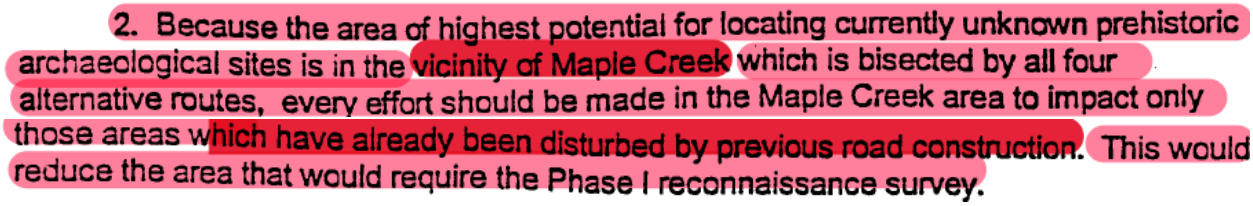

2. Because the area of highest potential for locating currently unknown prehistoric archaeological sites is in the vicinity of Maple Creek which is bisected by all four alternative routes, every effort should be made in the Maple Creek area to impact only those areas which have already been disturbed by previous road construction. This would reduce the area that would require the Phase I reconnaissance survey.

Figure R22 – Minnesota Historical Society's 1999 Recommendation

1999 EAW Findings

Although the 1999 Environmental Assessment Worksheet (EAW) concluded with a negative declaration for an Environmental Impact Statement (EIS), the EAW process itself was never completed. The absence of public comments suggests that final residential input was never collected, and the State of Minnesota has no record of the EAW being formally submitted. These oversights alone justify the need for a new and complete environmental review.

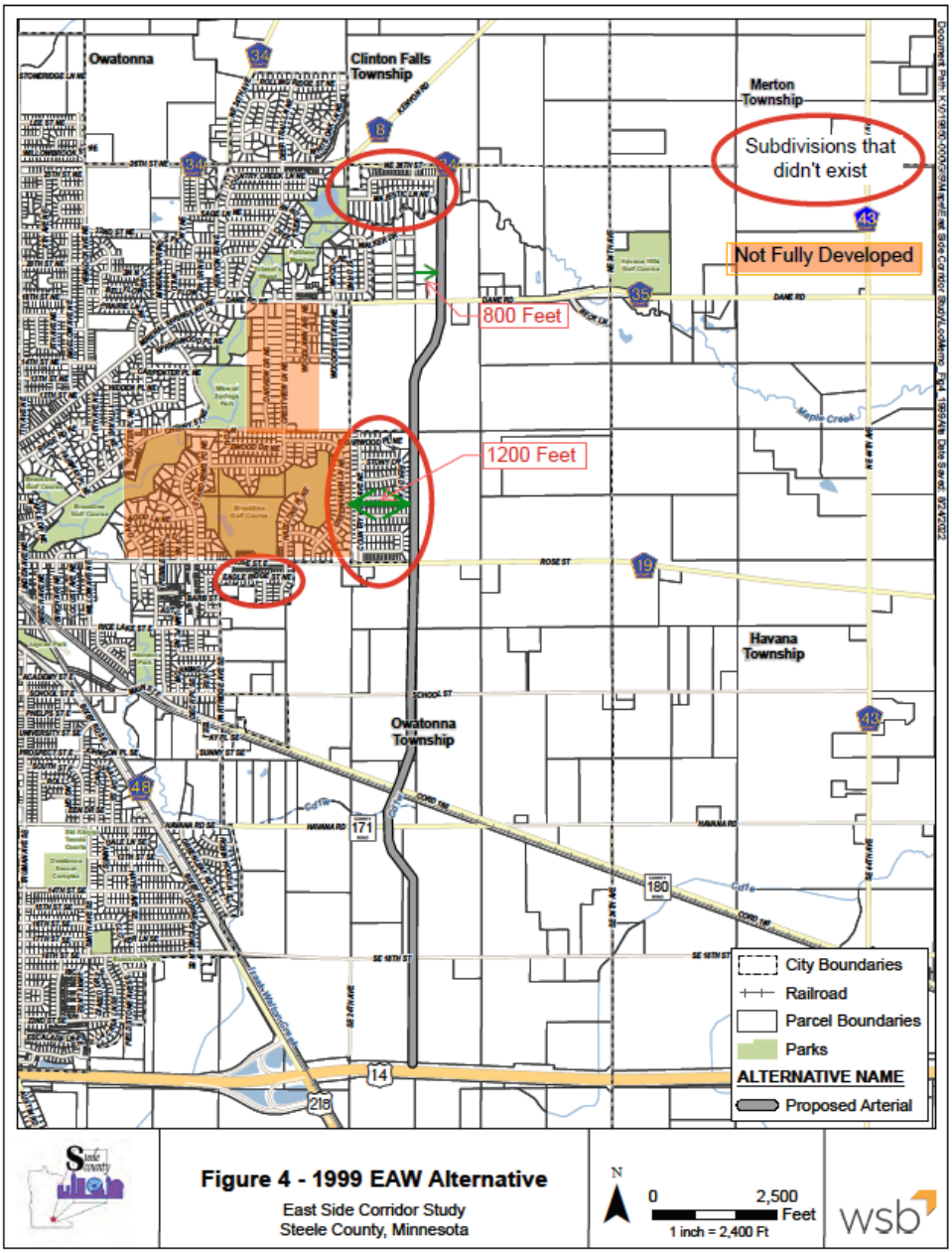
The EAW identified nine key issues, including noise impacts—and proposed a 150-foot right-of-way paired with an 800-foot setback from homes to avoid harm. This reflected a clear strategy of impact avoidance, in line with both environmental and ethical planning practices at the time.

Yet today, the current Memorandum selectively cites the 1999 EAW—leaving out key recommendations like the 800-foot setback and impact avoidance. These omissions distort the project's history and ignore the very measures that once shaped a less harmful alignment.

Page 24: The Mapped Right-of-Way

The 1999 EAW introduced the idea of an officially mapped right-of-way to guide Owatonna's future growth. However, this was only a conceptual map—it did not involve land acquisition or establish legal right-of-way, as repeatedly confirmed by County Engineer Paul Sponholtz.

Despite this, WSB applied the 1999 concept to today's footprint, misrepresenting its original scale and intent. This revision distorted the planned setbacks—originally designed to protect residents and travelers—and was used to justify the current alignment to federal agencies. In doing so, the original goal of minimizing impacts and ensuring safety was undermined.



Page 25: US Highway 14 - Owatonna Beltline Study (2004)

The 2004 U.S. Highway 14 – Owatonna Beltline Study, cited by WSB, recommended against using the previously mapped right-of-way. Instead, it proposed preserving both 34th and 44th Avenues, specifically identifying 34th Avenue (Alternative 5 today) as an ideal "internal collector"—the very function now assigned to the East Side Corridor. This is the only study to recommend an inner corridor; earlier reports focused solely on a "beltline".

Despite this, officials—including the County Engineer, Commissioners, City Council, and Administrator—continue to claim that "this is a new road with a new purpose," invalidating prior reports. Yet, these same studies appear to be the foundation of current recommendations.

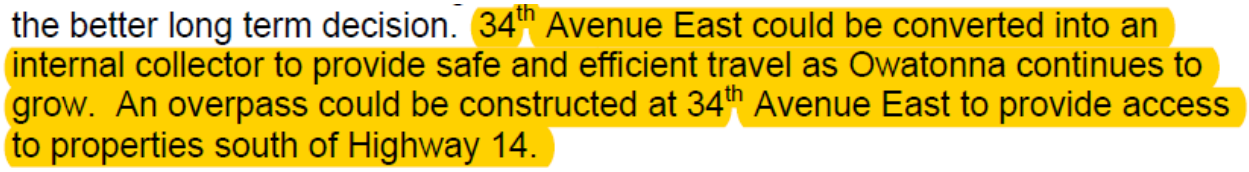
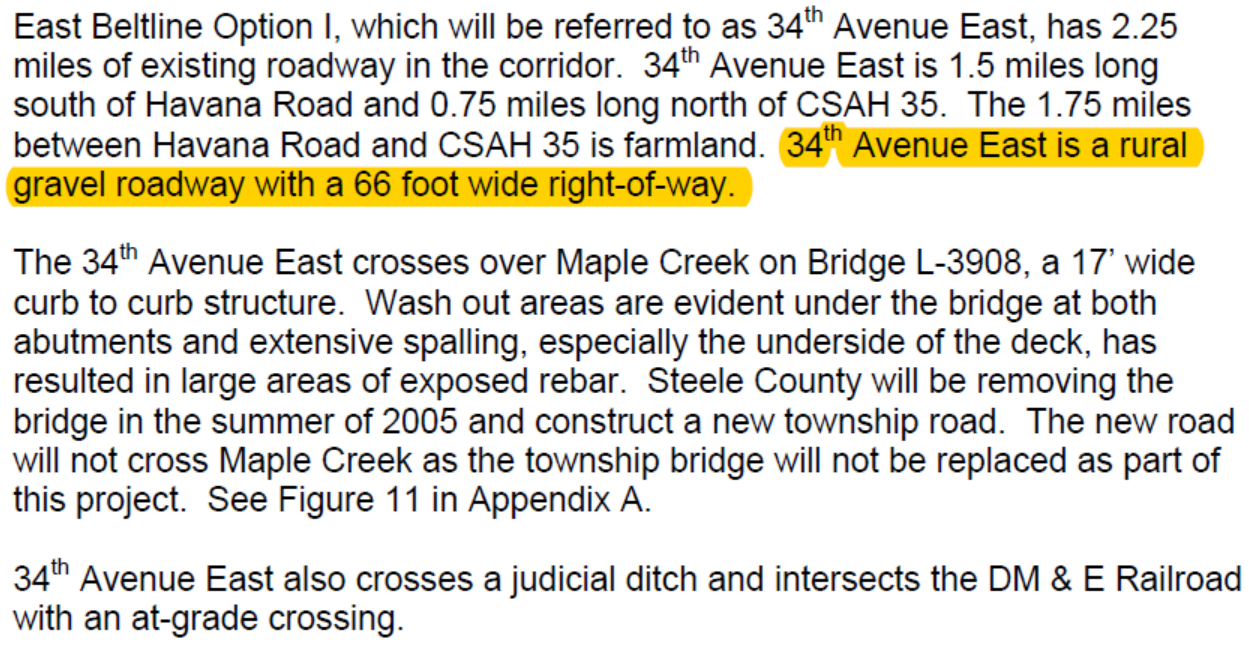

the better long term decision. 34th Avenue East could be converted into an internal collector to provide safe and efficient travel as Owatonna continues to grow. An overpass could be constructed at 34th Avenue East to provide access to properties south of Highway 14.

Figure R23 - *US Highway 14 - Owatonna Beltline Study (2004):* Recommendation for 34th Avenue to serve as an inner collector (Page 30, Recommendations).

The study also noted that 34th Avenue (Alternative 5 today) was an existing gravel road with a 66-foot right-of-way (Figure R24). A historical bridge once spanned Dane Road, but the bridge sustained significant damage and was removed around 2005, as noted in Steele County Board Meeting Minutes. After its removal, nearby farmer, Mark Rypka, tilled under the road—explaining its current absence. He publicly confirmed this during the May 31, 2023 open house. Historical records, including Figure R25, show the road existence as early as the 1930s, and Figure R24 confirms the presence of at-grade railroad crossing, reducing the need for additional crossings. Public support for using 34th Avenue (Alternative 5 today) dates back to at least 1993, as consistently documented in comments and prior studies.


East Beltline Option I, which will be referred to as 34th Avenue East, has 2.25 miles of existing roadway in the corridor. 34th Avenue East is 1.5 miles long south of Havana Road and 0.75 miles long north of CSAH 35. The 1.75 miles between Havana Road and CSAH 35 is farmland. 34th Avenue East is a rural gravel roadway with a 66 foot wide right-of-way.

The 34th Avenue East crosses over Maple Creek on Bridge L-3908, a 17' wide curb to curb structure. Wash out areas are evident under the bridge at both abutments and extensive spalling, especially the underside of the deck, has resulted in large areas of exposed rebar. Steele County will be removing the bridge in the summer of 2005 and construct a new township road. The new road will not cross Maple Creek as the township bridge will not be replaced as part of this project. See Figure 11 in Appendix A.

34th Avenue East also crosses a judicial ditch and intersects the DM & E Railroad with an at-grade crossing.

Figure R24 - US Highway 14 - Owatonna Beltline Study (2004) highlights the existence of a right-of-way along 34th Avenue (Alternative 5 today).

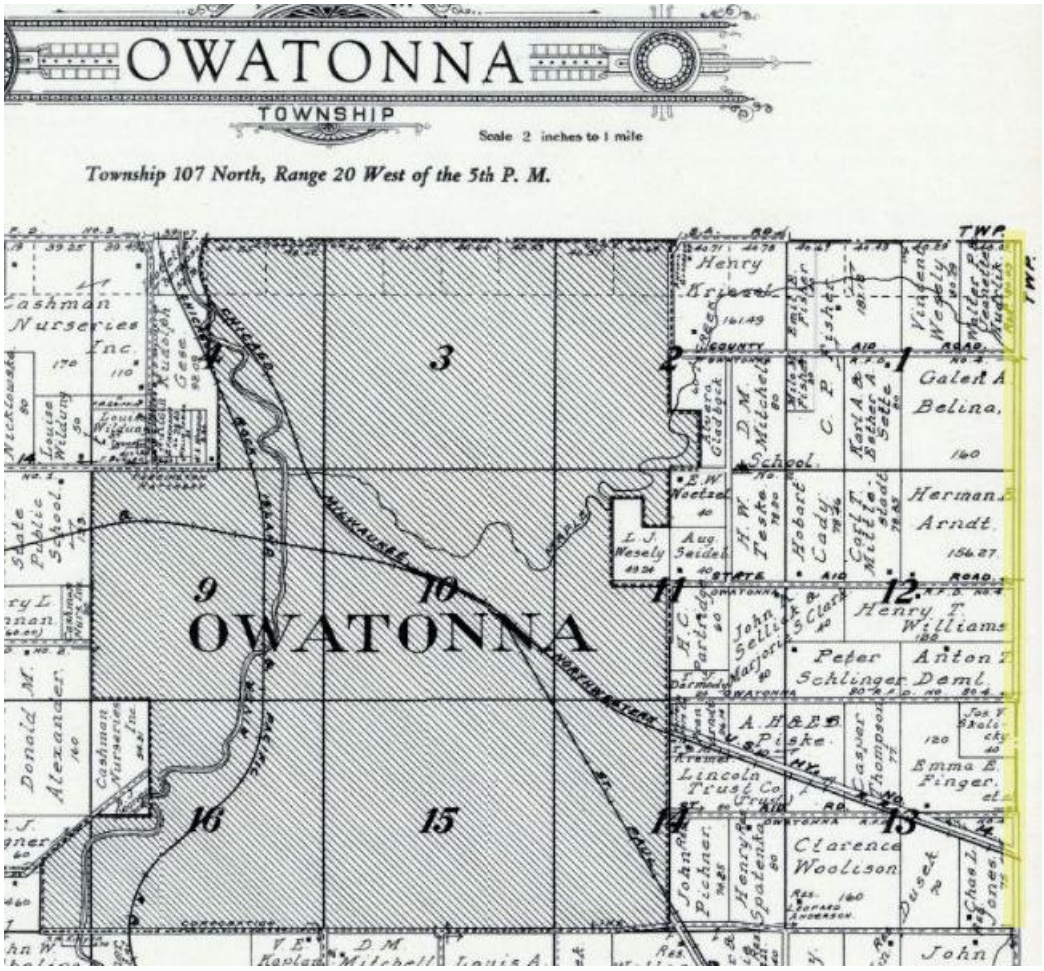


Figure R25 – *1937 Central Atlas Co.* plat of Owatonna Township showing 34th Avenue (Alternative 5).

Historical records, including a 1937 plat map, confirm that 34th Avenue (Alternative 5 today) existed long before it was tilled under. More importantly, Steele County is documented as owning 18 acres of the necessary right-of-way (Figure R26). This isn't just a mapped idea—it reflects actual land ownership. Unless the land was sold—an event for which no record exists in county archives—it is reasonable to conclude that Steele County still owns the corridor.

Although the 34th Avenue East option would require approximately 91 acres, approximately 18 acres are already owned by Steele County. An additional 73

Figure R26 - *US Highway 14 - Owatonna Beltline Study (2004):* Page 13 of the study documents Steele County's ownership of 18 acres along 34th Avenue (Alternative 5).

This 2004 study also emphasized maintaining sufficient setbacks to avoid the need for noise walls. In line with the 1995 report, subdivisions were planned with 800+ foot buffers to reduce noise impacts. In contrast, this current plan proposes a right-of-way just 100 feet wide—placing the road only 17 feet from homes in the North Country Subdivision. Despite this proximity, officials have told residents they do not plan to build a noise wall, even though it may be required.

Page 25: Future Transportation Plans

On March 9, 2004, the City of Owatonna and Steele County entered into a Joint Powers Agreement to preserve the mapped right-of-way. This agreement granted the first right of purchase or refusal and a six-month contention window should a permit be requested. However, six months after this agreement, the first house was built **ON** the mapped right-of-way without contention. The City and County failed to preserve this mapped right-of-way and now residents are being asked to bear the consequences.

Subsequent planning documents—the 2006 Owatonna Development Plan and 2005–2025 Steele County Transportation Plan—showed major shifts from the original mapped route (Figure R27). New roads like 34th and 44th Avenues were proposed, while the original corridor was shortened and buffered from the North Country Subdivision aligning more closely with Alternative 4 than Alternative 3. These updates reflect the abandonment of the original corridor concept and a shift toward lower-impact alternatives.

The Steele County 2005-2025 Transportation Plan even included a connection between Dane Road and Rose Street—designed *with* North Country in mind, as it was already platted. Residents reasonably relied on that plan when choosing to live there. It influenced both their decisions and the subdivision's layout—none of which contemplated a return to a long-abandoned corridor.

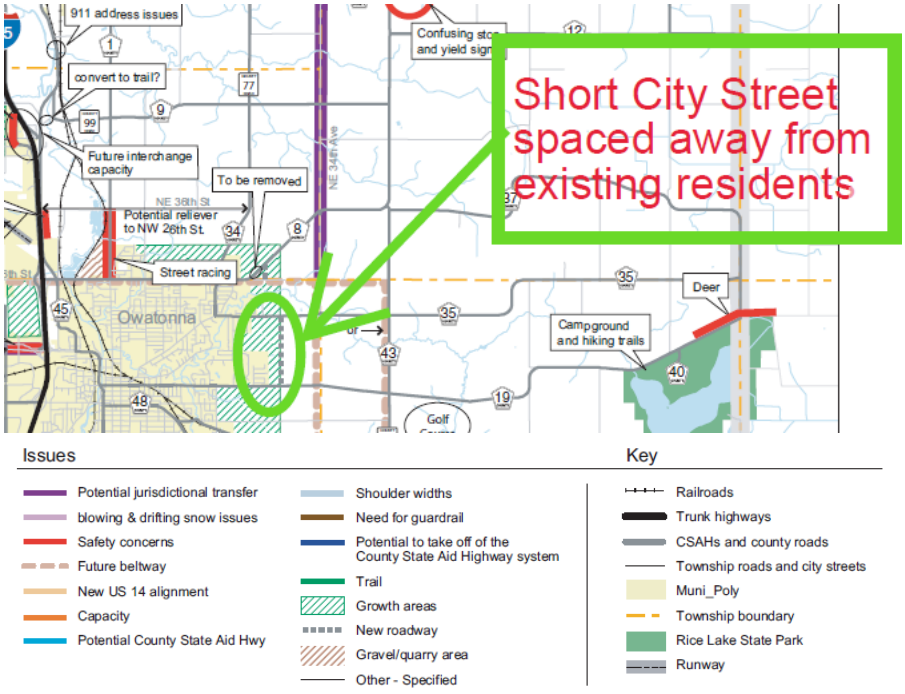


Figure R27 – The *2005–2025 Steele County Transportation Plan* illustrates planned growth between the North Country Subdivision, in its early stages of development, and a shorter proposed roadway.

Page 25: 2011 Beltline Study

The 2011 Beltline Study—completed by WSB—designated 44th Avenue as the preferred beltline route, later incorporated into the 2021 Highway 14 expansion. Yet, despite more than 30 years of planning, the beltline remains unfinished. Meanwhile, 34th Avenue (Alternative 5 today)—mapped as a 150-foot right-of-way and intended to serve as an inner collector—remains unobstructed. This stands in contrast to the previously mapped (29th Ave) corridor now being revived, which has long since been developed and compromised. WSB's current support for that route, despite their prior recommendation, raises serious concerns about the consistency and credibility of the planning process.

Page 28: Steele County 2040 Transportation Plan (2021)

Several issues in the Steele County 2040 Transportation Plan and related documents raise concerns about transparency and process integrity.

Memorandum Claim:
The community expressed support for County ownership of the new 29th Avenue during public meetings, listening sessions, open houses, and survey responses.

Concerns:
The Plan was adopted on July 13, 2021, but the first East Side Corridor open house wasn't held until July 21, 2022—over a year later. That open house had just two days' notice in the local paper and postcards arrived only days before. This timeline calls into question how "community input" was gathered for support of 29th Avenue prior to public engagement. In fact, residents have expressed concerns and opposition consistently since that first open house.

Memorandum:
The 29th Avenue project will reduce traffic on CSAH 45 and Mineral Springs Road and is supported by prior beltline and east-side corridor studies.

Concerns:
No studies have been presented to support this claim. The Memorandum itself was the first to share data and showed that only ~800 vehicles might be diverted from a single intersection—saving less than two seconds per trip. It also showed no traffic relief for CSAH 45. The claim of broader congestion relief is not substantiated.

New Development
The Memorandum notes new developments but omits critical details: both the North Country and Shady Hills subdivisions were built directly over the originally mapped right-of-way. Instead of initiating eminent domain, the Responsible Government Unit (RGU) narrowed the project area to 100 feet, leaving just 17 feet separating it from existing homes. This is a drastic departure from the 800-foot setback and 150-foot right-of-way originally recommended to minimize noise and visual impacts fails to provide the safe, cohesive travel experience that was initially planned (Figure R15).

Completely omitted from the Memorandum is the Joint Powers Agreement (https://www.owatonnaeastsidecorridor.com/downloads/05jointPowersagreement.pdf), signed on March 9, 2004, which aimed to preserve land for a future right-of-way. The agreement granted first right of refusal, first right of purchase, and a six-month contention window. Just six months later, the first home was built on that mapped right-of-way with no objection. Homes have continued to be constructed on this alignment without contention since (as seen in Figure R2)—reinforcing the abandonment of the corridor concept by both the city and county. No formal right-of-way or easement was ever recorded—only a conceptual alignment.

State and federal regulations require that projects avoid adverse impacts whenever feasible, followed by minimization and mitigation. The Memorandum itself acknowledges that Alternative 4 would offer the same benefits as Alternatives 2 and 3—making avoidance entirely feasible in this case. Yet, despite clear opportunity and regulatory guidance, the RGU has ignored this safer alternative. The safeguards that were designed to protect residents have been abandoned, and the consequences are now being unfairly shifted onto existing communities.

As noted in the Memorandum, The East Side Corridor will primarily serve future developments between the current boundary and 34th Avenue (Alternative 5), offering minimal benefit to existing neighborhoods. Alternative 4, which aligned with traffic needs and regulatory standards, was dismissed despite meeting stated goals. CSAH 45 and 48 traffic relief remains unproven.

Next Steps

"This ongoing study will also build on potential impacts identified in previous studies and consider efforts to avoid, minimize, and mitigate these impacts."

On October 14, 2024, residents asked whether avoidance would be included in the Environmental Assessment Worksheet (EAW). As of January 2, 2025, no answer has been given. The County Engineer had previously stated all regulations were being followed—but the earlier EAW had already recommended a route over 800 feet from homes. That should have been reflected in this Memorandum.

In November 2023, County Engineer Greg Ilkka admitted he didn't know homes had been built on the mapped right-of-way—despite residents raising the issue since July 2022. (See Figure R2.)

Residents have also offered compromise routes to reduce impacts. None have been considered. This lack of transparency and participation continues to erode public trust in the process.

Conclusion: Selective History Used to Justify a Preselected Route

Chapter 1 illustrates how selective historical interpretation has been used not to inform the best solution—but to validate a predetermined outcome. Rather than building on the full context of decades of planning, previous studies, and public feedback, this process has cherry-picked facts that support a specific route while ignoring key findings that emphasized avoidance, safety, and long-term cost savings.

The original intent of the mapped right-of-way, the 800-foot setbacks to prevent noise and visual impacts, and repeated recommendations for inner collectors like 34th Avenue (Alternative 5) have all been downplayed or omitted. Meanwhile, today's planning documents present a distorted narrative—one where current development patterns appear to have guided the process from the start, even when those developments conflict with previous plans.

This selective use of history paints an incomplete and misleading picture, one designed to rationalize building within 17 feet of existing homes instead of organically identifying the most balanced and responsible alternative. If the goal is truly to develop the most cost-effective, least harmful, and community-centered solution, the process must embrace the full scope of historical data and resident concerns—not rewrite them to justify an already-made decision.

Chapter 2: Traffic Studies and New Information

The second chapter of the Memorandum focuses heavily on travel time, trip length, and congestion relief to justify the preferred alternative. However, the data used to support these conclusions is riddled with inaccuracies, biased assumptions, and questionable calculations—many of which contradict basic math or exclude more favorable alternatives. These errors raise serious concerns about whether this analysis was designed to explore all viable routes fairly, or merely to validate a predetermined outcome.

Page 34: Appendix C: Connectivity and Travel Times

Emerging Inaccuracies and Misleading Assumptions

Several issues undermine the credibility of the travel time data used to justify the preferred route:

- **Four of six modeled routes use incorrect distances**, which directly skews travel time calculations. While travel time can vary, distance is a fixed metric and should not be misrepresented.

Motor Vehicle Trip Length/Distance (in miles) and Travel Time (in minutes) between Origins and Destination)

		Destinations		
Existing	Origins	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
	26th St NE & Kenyon Rd	10 min/4.5 mi	10 min/3.9 mi	not served by any ESC alternative
	Country View Ave & Fox Hollow Ln	7 min/3.5 mi	10 min/3.7 mi	11 min/4.9 mi

- Actual measurements show:
  - 26th St. to Hy-Vee: 4.1miles, 11minutes
  - Countryview & Fox Hollow Ln to Owatonna High School: 3.7miles, 8 minutes
  - Countryview & Fox Hollow Ln to Hy-Vee: 3.9miles, 11 minutes
  - Countryview & Fox Hollow Ln to the hospital: 5.1mi, 12 minutes

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

Figure R28 – Accurate times and distances based on google from WSB designated points

- At the May 30, 2023 open house, WSB representative Jack Corkle dismissed resident concerns that the East Side Corridor would not improve travel times, stating that such concerns were merely "opinions" and that tools like Google Maps were not reliable for calculating accurate distances or times. Ironically, the travel times and distances presented in the Memorandum are based on Google Maps data—the very tool residents were told was insufficient.

These discrepancies call into question the accuracy of the data submitted to government agencies in support of the East Side Corridor.

When accurate distances and times are used a different picture emerges

When proper distances are applied, the perceived advantage of Alternative 3 nearly disappears. In fact, the time difference between Alternatives 3 and 4 is reduced to mere seconds on the one route—and even then, that route primarily benefits those who are now asking for the road to be moved farther from their homes. Most North Country residents will likely continue using their existing routes to reach destinations like Hy-Vee, regardless of which alternative is selected.

Residental Analysis of Connectivity Data for Alts 3 and 4

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi
	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi	14 min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi	10 min/4.2 mi	10 min/5.4 mi
	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi	14 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi	11 min/4.6 mi	11 min/6.0 mi
	faster than existing			
	similar/shorter distance			
	slower than existing			

Figure R29 – Connectivity Comparison data for Alternatives 3 and 4 with accurate distances and time.
(Note: assuming Alternative distances and times are accurate for this comparison)

Based on accurate distances:

- **Alternative 3**: 2 routes are faster, 2 are similar, 1 is longer.
- **Alternative 4**: 2 routes are faster, 1 is similar, 2 are longer.

Compare this to WSB's claims:

- **Alternative 3**: 1 route faster, 3 similar, 1 longer.
- **Alternative 4**: 1 similar, 4 longer.

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi	14 min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi	10 min/4.2 mi	10 min/5.4 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi	14 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi	11 min/4.6 mi	11 min/6.0 mi

Even WSB's own data is inconsistently applied. For example, the route from 26th St & Kenyon Avenue to the high school shows a 10-minute travel time for both Alternatives 3 and 4. Yet Alternative 3 is highlighted yellow (labeled "similar/shorter distance"), while Alternative 4 is highlighted red (labeled "slower than existing").

This selective framing creates the illusion of a more significant difference between the alternatives than actually exists.

	Origin	Owatonna High School/US 14 & US 218 Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi

Corrected Distances Reveal Key Misrepresentations

- Alternatives 3 and 4 perform more similarly than reported, with both offering two faster routes, not just one.
- Neither alternative significantly improves access to Hy-Vee, rendering that metric largely irrelevant.
  Alternative 4 presents fewer residential impacts, making it the more responsible and community-focused choice.

Real-World Travel Patterns Overlooked

WSB and Steele County assert that the East Side Corridor is needed to reduce traffic through downtown. However, no surveys were conducted to determine whether the intended users—such as residents of North Country—actually use downtown routes or alternative paths.

In contrast, residents conducted a small informal poll that revealed the majority of North Country residents already avoid downtown—even if it means taking less direct routes—in order to bypass congestion. This behavioral insight was overlooked by both WSB and the County Engineer.

The following exhibits compare:

- Google's recommended routes, including distances and travel times, and
- The routes residents actually use, which often prove faster in real-world conditions than Google's estimates.

For example, the route from Countryview & Fox Hollow to the hospital typically takes just 9 minutes via Greenhaven Lane, a path not reflected in the project's analysis.

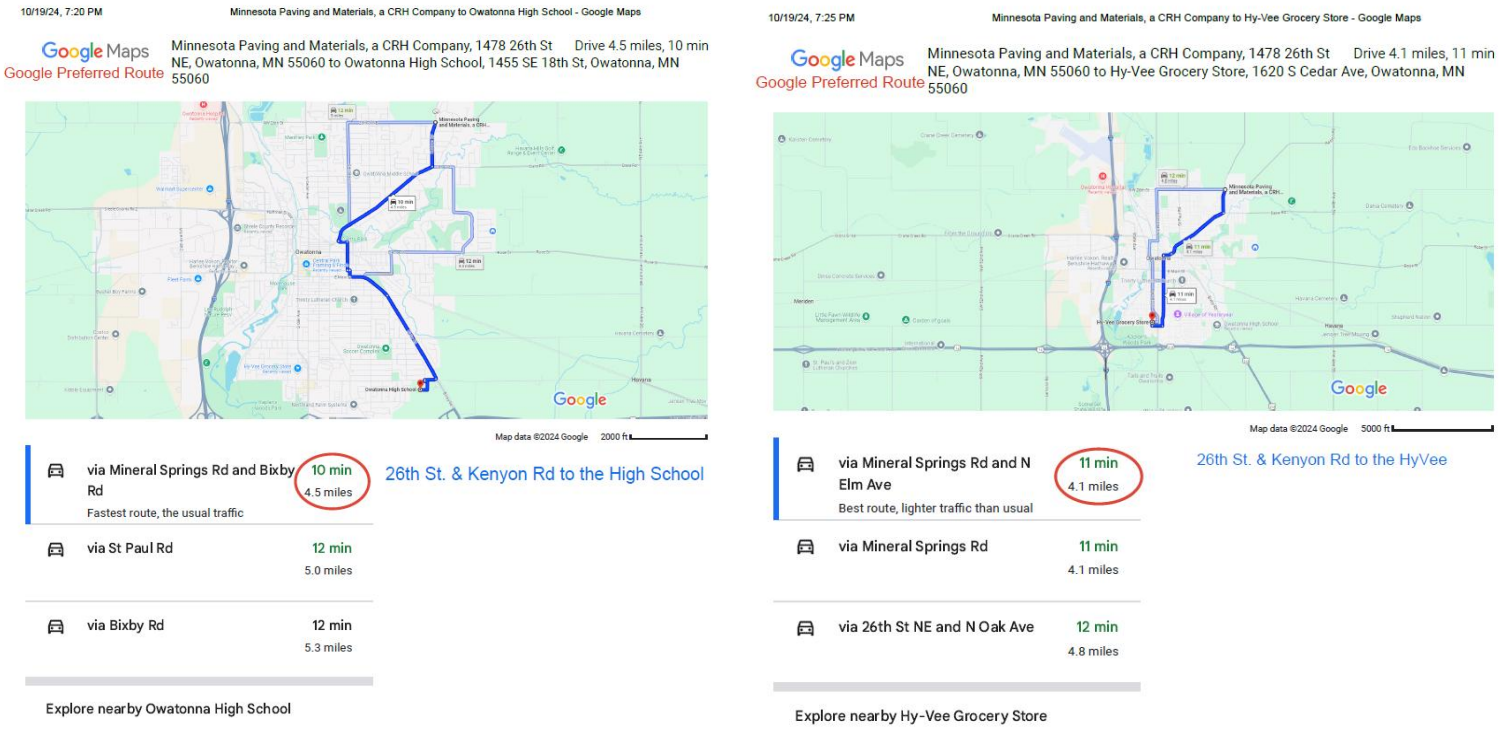


Figure R30 – 26th St. & Kenyon Rd to destination points

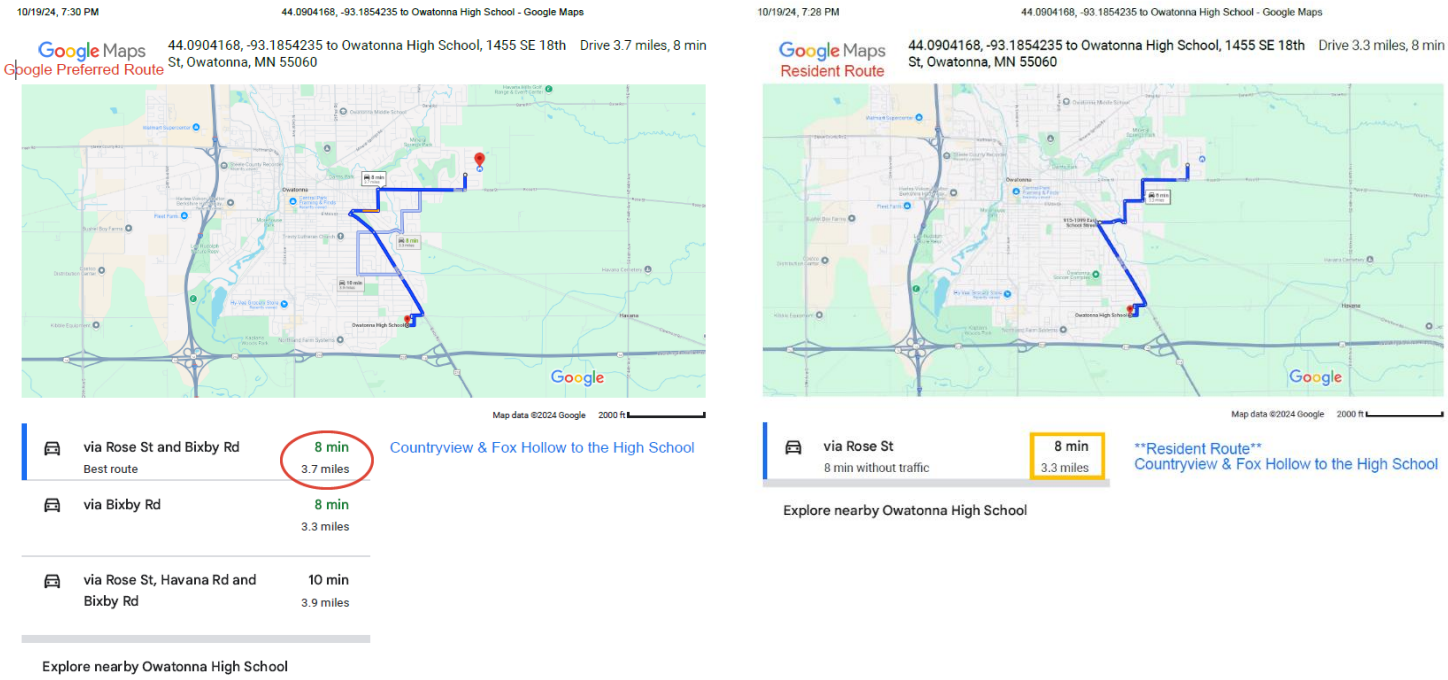


Figure R31 – Countryview & Fox Hollow Ln to the High School Google Recommended Route (left) 3.7 miles and Resident Preferred Route (right) 3.3 miles. Both 8 minutes travel time.

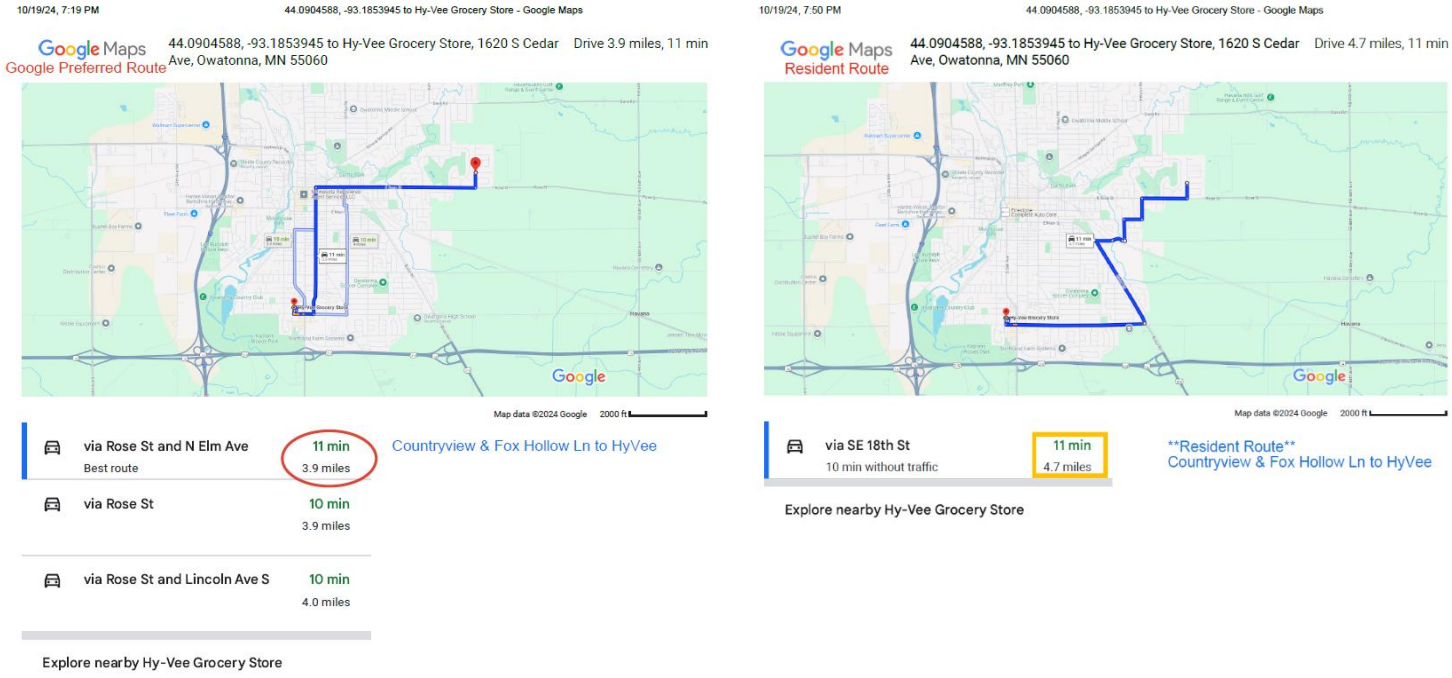


Figure R32 – Countryview & Fox Hollow Ln to Hy-Vee Google Recommended Route (left) 3.9 miles and Resident Preferred Route (right) 4.7 miles. Both 11 minutes travel time.

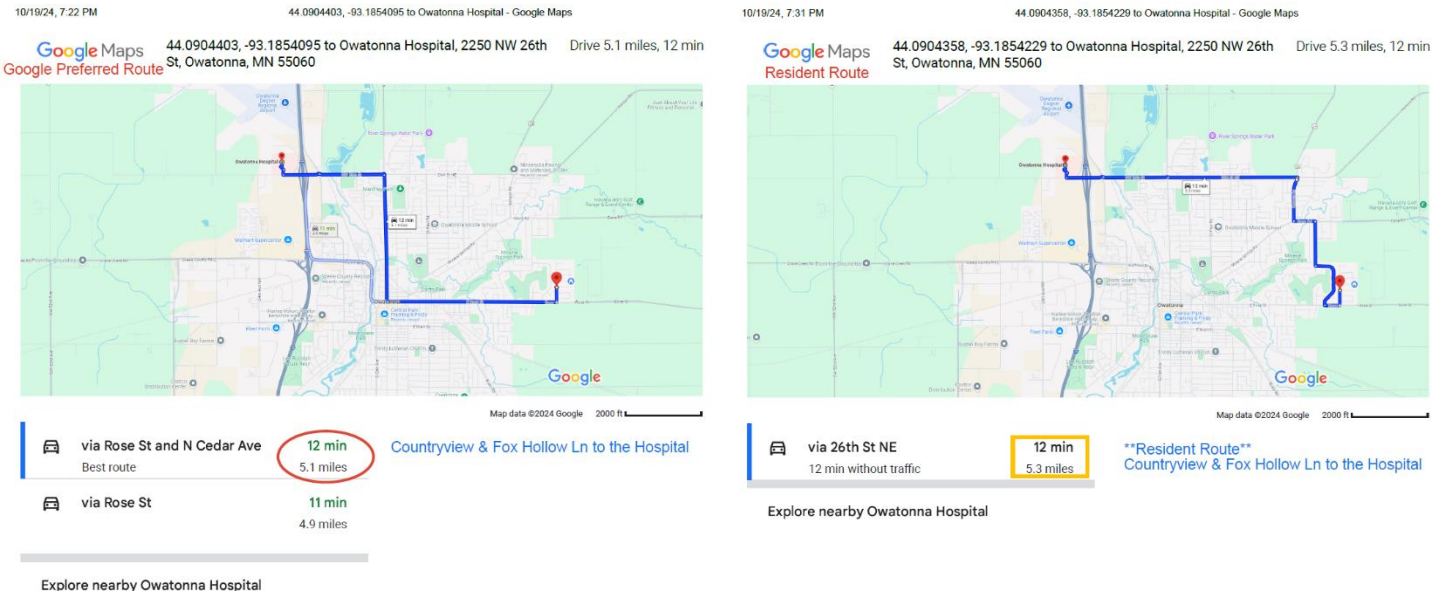


Figure R33 – Countryview & Fox Hollow Ln to the Hospital Google Recommended Route (left) 5.1 miles and Resident Preferred Route (right) 5.3 miles. Both 12 minutes travel time (although resident route is often faster).

The Memorandum fails to acknowledge that many residents already avoid downtown and are not contributing to traffic counts along the targeted routes. In fact, residents often choose longer routes, demonstrating a willingness to drive farther for only minor benefits—undermining the need for the proposed alignment. This makes the continued preference for Alternative 3 over Alternative 4—despite similar travel times and far greater residential impacts—appear less like an objective conclusion and more like an effort to justify a predetermined outcome.

Page 36: Traffic Analysis Memorandum

This analysis evaluates:

- Trip length and travel time between origins and destinations
- Downtown congestion impacts

However, it relies on the same inaccurate times and distances highlighted in the previous section. Notably, the chart on this page introduces an additional data set not found elsewhere in the Memorandum.

6	26th St NE and Cedar Ave	New Owatonna Senior High School	10	4.1	Cedar Ave, Rose St, Grove Ave, Main St, Bixby Rd, SE 18th St

That dataset—originally studied—was removed from final comparisons, because it showed no benefit from the East Side Corridor. If this route had genuinely offered improvements, the data would have reflected that. Instead, removing it appears to skew the analysis toward a predetermined outcome, rather than allowing the data to speak for itself.

Page 37: Calculations

While it's reasonable to use Google Maps for estimating travel times along existing routes, it is troubling that WSB both relied on and manipulated this data inconsistently. Distance—unlike time—is a fixed variable. Any deviation in distance between two known points signals an error or manipulation.

> The general method of estimating travel time and distance was to use Google Maps where possible for alternatives that follow existing roadways. Estimates for new alignments were determined by adding or subtracting time and distance from the Google Maps measurements. Travel time on new alignments was assumed to be one minute per mile in rural areas and two minutes per mile in developed areas. Although Alternative 6 has been dismissed from further consideration, it is shown in the tables in this section because it follows the existing SE 44th Avenue alignment and thus serves as the basis for many of the travel time and length estimates.

As professionals in this field, engineers are expected to apply fundamental mathematical principles—not manually add or subtract times from Google Maps or rely on broad assumptions. The formula is straightforward:

Time = Distance ÷ Speed

For example, the distance from 26th St. to 18th St. (3 miles), from Kenyon Rd. to Alternative 4 (1 mile), and then from Alternative 4 to the High School (1.25 miles) adds up to 5.25 miles. At 55 mph for 5 miles and 30 mph for the final 0.25 miles, the travel time is:

- **(5 ÷ 55 + 0.25 ÷ 30) × 60 = approximately 6 minutes (5:57)**

Yet, the Memorandum lists Alternative 4 from 26th St. & Kenyon Rd to the High School as taking 10 minutes**.** Even factoring in multiple stop signs (adding an exaggerated 30 seconds each), this route would still take no more than 8 minutes. These mathematical discrepancies raise serious questions about how travel times were calculated—and why they differ so drastically from basic math.

Compounding this issue is WSB's own contradiction. At the May 30, 2023 open house, representatives told residents that Google Maps was not a reliable tool for measuring travel times. Yet that same tool appears to be the foundation for their own data—and selectively modified to suit the outcome.

Similarly, the Alternative 5 (34th Avenue) route is 6.06 miles, which at 55 mph would take less than 7 minutes (6:36), yet the Memorandum claims it takes 11 minutes. These exaggerated time differences were used to disqualify Alternatives 4 and 5—an outcome that appears unsupported by real data.

Inaccurate and inconsistent calculations suggest these conclusions were not based on objective analysis, but rather tailored to disqualify specific alternatives. For a project of this magnitude, there is no justification for using hand-modified Google data and vague time assumptions like "1 minute per mile" in place of standard mathematical models or engineering software.

The differences aren't just minor—they're astounding, and they call into question the integrity of the decision-making process itself.

When standard mathematical formulas are correctly applied—even accounting for generous 30-second stops—a very different picture emerges. Alternative 3 offers no significant improvement over current routes, while Alternative 4 proves to be the fastest overall, with all routes showing time savings. Alternative 5 is only a few seconds slower on one route. (See Figure R34)

Residental Analysis of Alternatives Using Matememathical Formulas + Stops

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8	13min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7min/2.8 mi	10 min/4.3 mi	9 min/5.7 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	8 min/5.1 mi	11 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	6 min/3.3 mi	9 min/4.8 mi	10 min/6.0 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
5	26th St NE & Kenyon Rd	9 min/6.1 mi	12 min/7.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/4.3 mi	10 min/5.8 mi	11 min/7.0 mi

faster than existing
similar/shorter distance
slower than existing

**Alternative 3 in it's proximity to homes will cause a slower roadway - assumed a 40mph travel speed.
**Factored in 30 seconds for each of 4 stops on each route. Most stops do not take 30 seconds.

Figure R34 – Estimated Travel Times for Alternatives 3–5 Using Standard Time Formula with 30-Second Stop Delays Included.

How did WSB's "assumed" travel times for Alternatives 4 and 5 diverge so significantly from the travel times produced using standard distance-speed calculations? This discrepancy raises serious concerns about the validity of the assumptions used in the analysis. If basic formulas—combined with reasonable delays—demonstrate shorter or comparable travel times, then WSB's assumptions appear to have artificially disadvantaged Alternatives 4 and 5, leading to their premature dismissal.

Page 38-44: Justifications

These pages attempt to justify travel time differences between alternatives. However, the analysis did not use actual calculated times or consider current travel behaviors of residents—calling the validity of these comparisons into question. Even using inaccurate data, the Memorandum acknowledges that Alternatives 2 through 4 offer similar benefits. So why was Alternative 4 removed from consideration? Had proper calculations been applied, Alternative 5 likely would have remained viable as well. The pattern suggests bias in favor of a predetermined outcome rather than a fair evaluation of all options.

Page 45: Trip Time Summary

Tables 8 and 9 rely on travel times and distances derived from methods previously shown to be inconsistent and unreliable. Given the questionable techniques used—such as adding and subtracting from Google Maps without proper calculations—these summaries should not be considered accurate or dependable until travel times are recalculated using standard methodologies.

Page 45: Downtown congestion impacts

This section fails to reflect the actual travel patterns of residents. Due to downtown traffic delays and poorly synchronized lights, many residents already avoid this area—opting for longer but faster-moving alternative routes. These routes, shown in Figures R31–R33, were not studied or acknowledged.

Additionally, while the report claims future growth may increase downtown congestion, it overlooks a key fact: there is no east-west connector that bypasses downtown. The East Side Corridor, being a north-south route, does not solve this core issue. For example, travel from NE Owatonna to the Hy-Vee area remains unaffected, making such data points irrelevant to the East Side Corridor's justification.

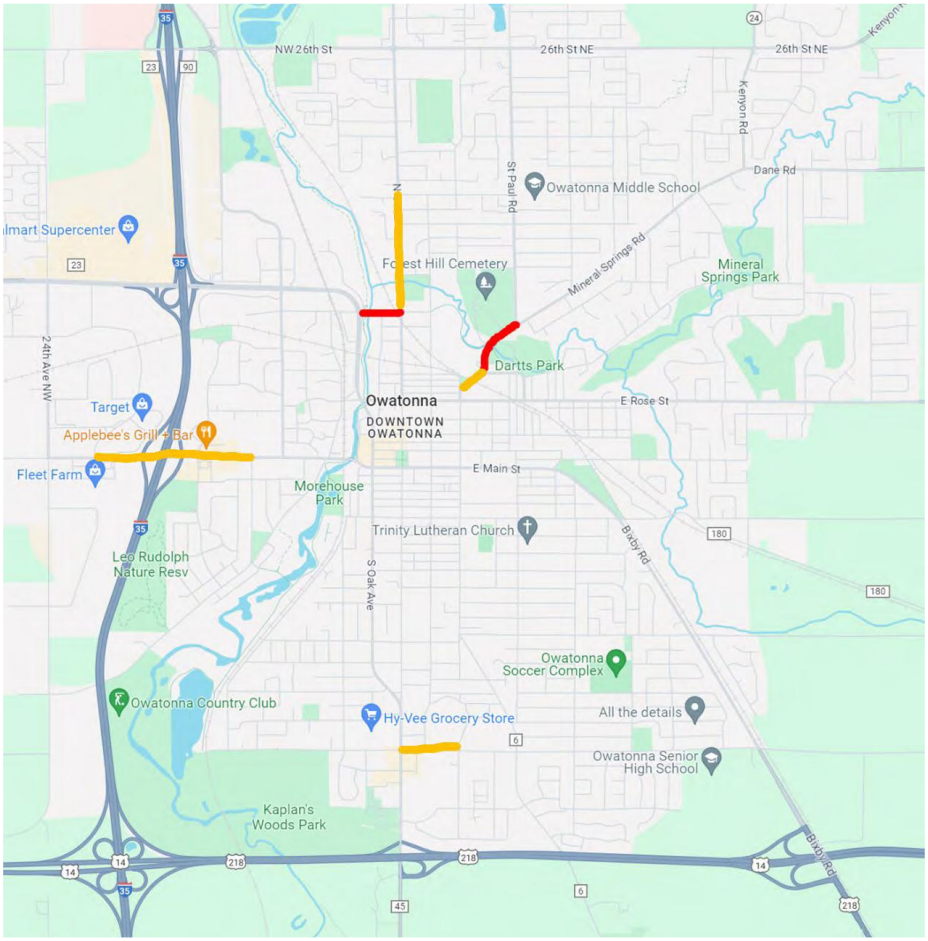
As Owatonna was designed with a spoke-and-wheel road system meant to draw people into the downtown core, the report also fails to address potential economic and logistical consequences of diverting traffic away from downtown—the very heart of the city.

Page 46: Roads Approaching Capacity

Figure 8 claims that certain roads are nearing or at capacity, yet no accompanying studies or data are provided to support this assertion. According to the Memorandum, the East Side Corridor may alleviate traffic at two locations—but these are essentially the same spot, just feet apart on Mineral Springs Road, with a reported net savings of only two seconds.

More critically, this plan redirects traffic toward the already problematic intersection at 18th Street and Oak Avenue, a location long recognized for safety concerns. In effect, the proposal simply shifts the problem rather than solving it, acting as a temporary band-aid for congestion on Mineral Springs Road.

As Owatonna continues to grow, Mineral Springs Road will likely remain a primary east-west connector regardless. This raises the question: does the East Side Corridor actually solve a problem, or just relocate it?



That's not to say a corridor on the east side of town isn't necessary or unjustified—but using downtown traffic relief as the primary rationale is not a sound or measurable justification. The most significant benefit of this project is clearly tied to future development. If growth is the goal, then infrastructure must come first—but that requires transparency. Plans for future growth should be shared openly, yet so far, that data has been withheld from this project.

Page 47: Roads Approaching Capacity Continued

Table 10 in this report, shown below, is based on projected 2040 traffic data taken from the Steele County 2040 Transportation Plan. However, the 2040 Plan was developed and adopted *after* East Side Corridor studies were already underway and residents had been referencing data from the then-current 2025 Plan. The timing of the 2040 Plan's release raises legitimate concerns about whether it was produced, at least in part, to help justify the East Side Corridor—rather than serving as an objective, forward-looking planning document.

Table 10. Roadways approaching or exceeding capacity per the Steele County 2040 Transportation Plan.

Roadway	From	To	2040 AADT	Capacity	V/C
Bridge St	Park Dr NW	Selby Ave	20,500	22,000	0.93
18th St SW	CR 45	Hartle Ave	9,500	10,000	0.95
North St	CR 45	Cedar Ave	11,300	10,000	1.13
Cedar Ave	North St	16th St NE	9,200	10,000	0.92
Mineral Springs Rd	Fremont St	Cherry St	9,300	10,000	0.93
Mineral Springs Rd	Cherry St	St Paul Rd	10,100	10,000	1.01

In comparing data from MnDOT's Traffic Mapping Application (https://www.dot.state.mn.us/traffic/data/tma.html), as referenced in this section, traffic volumes have decreased by 8–20% on all but one of the identified "congested" roadways between 2019 and 2024. This trend raises important questions about whether congestion is currently a legitimate concern warranting such significant infrastructure investment.

Roadway	From	To	2019 AADT	2024 AADT	2040 AADT	Capacity	Current V/C	Capacity Change
Bridge St	Park Dr NW	Selby Ave	15400	11,123	20,500	22,000	0.51	-19.4%
18 St SW	CR 45	Hartle Ave	6200	6,550	9,500	10,000	0.66	3.5%
North St	CR 45	Cedar Ave	8900	6,959	11,300	10,000	0.70	-19.4%
Cedar Ave	North St	16 St NE	7200	5,521	9,200	10,000	0.55	-16.8%
Mineral Springs Rd	Freemont St	Cherry St	7900	7,025	9,300	10,000	0.70	-8.8%
Mineral Springs Rd	Cherry St	St. Paul Rd	9300	7,825	10,100	10,000	0.78	-14.8%
			**There was no 2019 data, next most recent 2011 data used					

Figure R35 – Current and Historical AADT: Traffic volumes in Owatonna have shown a downward trend over time.

The only roadway that saw an increase—just 3.5%—was 18th Street, the same corridor this report acknowledges will see added traffic under the East Side Corridor plan. While the 2040 AADT projections suggest this segment may near capacity, reaching those levels would require a traffic increase of over 30%, which is a significant and currently unsupported growth assumption.

Inflated Diversion Estimates and Questionable Assumptions

This report claims that a maximum of 3,800 vehicles could be diverted by the East Side Corridor—1,500 from Bigelow Avenue and 2,300 from Mineral Springs Road. However, this total is misleading. Bigelow intersects Mineral Springs Road, and with only 12 homes on this segment of Bigelow, it's logical that many of the 1,500 vehicles also travel on Mineral Springs. Therefore, combining both figures inflates the number and risks double-counting traffic. The actual number of unique trips that could be diverted should not be assumed to be more than 2300 possible vehicles.

Compounding this issue, the report assumes—without supporting evidence—that 50% of these trips would benefit from the East Side Corridor. Whether that number is accurate or inflated is unclear, as no origin-destination data or survey results were presented.

However, actual calculations tell a different story. Traveling from Bigelow and Mineral Springs Road to the high school via Alternative 5 covers 6.3 miles—0.8 miles at 30 mph and 5.5 miles at 55 mph—yielding a total travel time of approximately 7.5 minutes. The current route is 3.5 miles and takes 8 minutes per Google Maps. Even though Alternative 5 saves 30 seconds, it adds significantly more distance—a tradeoff many drivers are unlikely to make.

Alternative 3 offers a similar 8-minute travel time over 5 miles, assuming an average speed of 40 mph. Again, for no significant time savings and a 71% increase in distance, drivers may simply continue using current routes.

Bigelow & Mineral Springs Rd to High School

Route	Time	Distance
Current:	8 minutes	3.5 miles
Alternative 3 (29th Ave):	8 minutes	5 miles
Alternative 4 (New Route):	6.5 minutes	5.3 miles
Alternative 5 (34th Ave):	7.5 minutes	6.3 miles

Figure R36 – Travel Times Based on Distances and Speed Calculations

Additionally, this area would not benefit from the East Side Corridor for most key destinations. For instance, Hy-Vee is already just 7 minutes away. Even if the East Side Corridor reduced travel time to the high school to 6 minutes, Hy-Vee—located 1.6 miles farther west—would still take at least 10 minutes. Current alternatives to the hospital are also faster. It's unlikely that anyone would choose to drive east just to go west again.

In reality, the only potential benefit of the East Side Corridor for these residents might be travel to the high school—but even that is questionable. While OHS serves approximately 1,500 students, it is highly unlikely that more than half of the 1,500–2,300 vehicles recorded at this intersection are headed there. A more plausible explanation is that much of this traffic is traveling to and from the nearby elementary and middle schools, which serve over 2,000 students just a few blocks away, that would not significantly benefit from the East Side Corridor.

Given the flawed assumptions and lack of supporting data, even the claim that 800 vehicles would benefit is speculative at best. And even if that number were accurate, the projected benefit amounts to a cumulative savings of just two seconds per vehicle. Recent decreases in traffic volumes may already offer similar relief, at no cost, further undermining the justification for the project.

Chapter 2 Summary: Traffic Data Manipulation Reveals Biased Outcome

Chapter 2 critically examines the traffic data and connectivity analysis used to support the East Side Corridor project. It reveals that WSB and Steele County relied on questionable assumptions, inconsistent travel time estimates, and manipulated Google Maps data rather than using standard, transparent calculations. Multiple travel routes contain inaccurate distance measurements, and fundamental mathematical formulas were overlooked—despite being essential to traffic modeling.

Additionally, the report fails to account for real-world resident behavior, such as the common practice of avoiding downtown congestion by taking alternative routes. It also overstates potential benefits, such as time savings and diverted traffic volumes, without sufficient evidence or clarity on how those figures were derived. In some cases, traffic appears to have been double-counted, and unsupported assumptions—like 50% of drivers benefiting from the East Side Corridor—are presented as fact.

What is clear is that recent traffic trends show a decrease in congestion, and standard travel time formulas demonstrate that Alternatives 4 and 5 are faster than Alternative 3. Yet, despite their advantages, Alternatives 4 and 5 were dismissed prematurely.

By using imprecise assumptions and manipulated Google Maps estimates rather than accurate calculations, this report presents skewed data—raising legitimate concerns that the analysis was designed to justify a predetermined Preferred Alternative rather than objectively identifying the most effective, lowest-impact solution.

Chapter 3: Cost Analysis

This chapter highlights how cost estimates were selectively presented to support Alternative 3. Alternatives 4 and 5, which may offer fewer impacts and cost-saving advantages, were excluded from detailed analysis. Key expenses—like noise walls and urban roadway—inflate Alternative 3's cost, while lower-impact options were dismissed without full comparison.

Page 61: East Side Corridor Alternative Cost Estimates

Given the prohibitive cost of home condemnations, Alternatives 1A, 1B, 1C, and 2 were never truly feasible. Alternatives 4 and 5 were dismissed due to alleged travel time disadvantages—even though the Memorandum repeatedly asserts that Alternatives 2–4 offer comparable performance. This analysis has mathematically disproven the claims of longer travel times. As a result, cost breakdowns for Alternatives 4 and 5 were not included. However, using Attachment K, we can draw meaningful inferences about their potential costs and benefits.

Cost Estimates*

Item	Unit	Unit Cost	Option 1A		Option 1B		Option 1C		Option 2		Option 3	
			Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway (urban)	Mile	$ 3,600,000.00	2	$ 7,200,000.00	2.6	$ 9,360,000.00	2.6	$ 9,360,000.00	2	$ 7,200,000.00	2	$ 7,200,000.00
Roadway (rural)	Mile	$ 2,500,000.00	3.02	$ 7,550,000.00	2.83	$ 7,075,000.00	2.93	$ 7,325,000.00	3.29	$ 8,225,000.00	3.55	$ 8,875,000.00
Railroad Crossing	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00
Bridge	Each	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00
Box Culvert	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	3	$ 1,500,000.00	2	$ 1,000,000.00
Sound Wall	Lin Ft	$ 620.00	8000	$ 4,960,000.00	15700	$ 9,734,000.00	14900	$ 9,238,000.00	3300	$ 2,046,000.00	3700	$ 2,294,000.00
Building Removal	Each	$ 30,000.00	36	$ 1,080,000.00	38	$ 1,140,000.00	50	$ 1,500,000.00	10	$ 300,000.00		$ -
Total Take (Relocation)	Each	$ 250,000.00	36	$ 9,000,000.00	38	$ 9,500,000.00	50	$ 12,500,000.00	10	$ 2,500,000.00		$ -
RW (Perm) (Residential)	Sq Ft	$ 3.00	775,556	$ 2,326,668.00	756,191	$ 2,268,573.00	665,090	$ 1,995,270.00	794,362	$ 2,383,086.00		$ -
RW (Perm) (Rural)	Sq Ft	$ 0.75	775,556	$ 581,667.00	756,191	$ 567,143.25	665,090	$ 498,817.50	794,362	$ 595,771.50	1,983,451	$ 1,487,588.25
RW (Temp) (Residential)	Sq Ft	$ 1.00	267,827	$ 267,827.00	305,735	$ 305,735.00	254,666	$ 254,666.00	261,828	$ 261,828.00		$ -
RW (Temp) (Rural)	Sq Ft	$ 0.25	267,827	$ 66,956.75	305,735	$ 76,433.75	254,666	$ 63,666.50	261,828	$ 65,457.00	743,287	$ 185,821.75
		Total Cost		**$ 38,033,118.75**		**$ 45,026,885.00**		**$ 47,735,420.00**		**$ 29,577,142.50**		**$ 25,542,410.00**

*This is a high level budgetary comparison between alternatives and is not meant to reflect actual project costs. Variability and contingency are built into the estimate.

According to the current analysis, Alternative 3 includes 2 miles of urban roadway and 3.55 miles of rural roadway, totaling 5.55 miles. However, in its expanded form, the alignment only measures 4.6 miles. This discrepancy raises questions—where is the additional mile accounted for?

Due to its proximity to existing homes, Alternative 3 would create significant noise impacts, necessitating a $2.3 million noise wall. In contrast, Alternatives 4 and 5 are located farther east, away from noise-sensitive areas, and would not require such mitigation as they effectively avoid residential impacts. Urban roadway was incorporated into Alternative 3 to comply with MnDOT's speed requirements, yet rural roadway is substantially more cost-effective.

Residents previously informed officials of a federal regulation that allows the purchase of land for avoidance, funded in the same way as noise mitigation. That opportunity was ignored. Now that federal funding has been withdrawn, the full cost of the $2.3 million (or more as a stand-alone noise wall) noise wall will fall on Steele County taxpayers. This represents a missed opportunity for both cost savings and impact avoidance—an outcome that could have been prevented with better engagement and responsiveness to public input.

See Figure R37 for a comparison of known cost-related elements. Although Alternatives 4 and 5 would require longer roadways due to their locations farther east, Alternative 5 already includes 66 feet of owned right-of-way—a significant cost offset. Much of the route also follows an existing roadbed, reducing both construction costs and farmland disruption. It includes an existing railroad crossing, avoiding the need to create a new one and closing Havana Road, preserving east-west connectivity. Furthermore, Alternative 5 has already been mapped as a 150-foot right-of-way corridor and crosses Maple Creek at a previously established crossing protecting natural resources. 34th Avenue prevents floodplain encroachment, reducing the need for costly flood mitigations and allowing for shorter bridge span.

Item	Unit	Unit Cost	Alternative 3		Alternative 4		Alternative 5	
			Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway (urban)	Mile	$3,600,000.00	2	$7,200,000.00	0	-	0	-
Roadway (rural)	Mile	$2,500,000.00	3.55	$8,875,000.00	5	$12,500,000.00	5.54	$13,850,000.00
Railroad Crossing	Each	$500,000.00	1	$500,000.00	1	$500,000.00	0.5	$250,000.00
Bridge	Each	$4,000,000.00	1	$4,000,000.00	1	$4,000,000.00	1	$4,000,000.00
Box Culvert	Each	$500,000.00	2	$1,000,000.00	2	$1,000,000.00	2	$1,000,000.00
Sound Wall	Lin Ft	$620.00	3700	$2,294,000.00	0	$0.00	0	$0.00
Building Removal	Each	$30,000.00		-		-		-
Total Take (Relocation)	Each	$250,000.00		-		-		-
RW (Perm) (Residential)	Sq Ft	$3.00		-		-		-
RW (Perm) (Rural)	Sq Ft	$0.75	1983451	$1,487,588.25	2,373,451	$1,780,088.25	1,329,133	$996,849.42
RW (Temp) (Residential)	Sq Ft	$1.00		-		$0.00		$0.00
RW (Temp) (Rural)	Sq Ft	$0.25	743287	$185,821.75	743287	$185,821.75	743287	$185,821.75
		Total Cost:		**$25,542,410.00**		**$19,965,910.00**		**$20,282,671.17**

R37 – Cost analysis break down if Alternatives 4 and 5 had been included. Since Alternative 5 is an already existing roadway, there is a road bed that could be used as a basis for a new roadway reducing the "Roadway (Rural)" cost.

Both Alternatives 4 and 5 are more cost-effective and faster than Alternative 3. The estimated cost difference between the two is approximately $300,000. However, when factoring in potential savings from existing mapping and infrastructure, Alternative 5 may ultimately be less expensive. In contrast, Alternative 4 would impact more farmland due to the absence of previously acquired right-of-way.

Of all the options, 34th Avenue (Alternative 5) provides the greatest long-term flexibility, the fewest disruptions to residents and agriculture, and significant cost advantages. It is also the route local residents have consistently supported for more than 30 years.

Chapter 4: Conclusion

Conclusion

In summary, the inconsistencies in historical context, omission of critical data, and lack of basic mathematical applications in calculating travel times call into question whether this report genuinely followed the MEPA and NEPA processes to identify the most effective solution—or whether it was crafted to validate a predetermined outcome. Based on this review and supporting documentation, it appears to be the latter.

While the East Side Corridor concept originated in the 1990s and a general route was identified, those plans were effectively abandoned in 2004 when the City of Owatonna and Steele County allowed homes to be built within the mapped right-of-way. This shift was documented in subsequent studies, and future transportation plans modified the alignment, including shorter and more easterly alternatives. 34th Avenue (Alternative 5 today) was specifically mapped and preserved as an inner corridor, consistent with multiple studies and policy goals.

When standard travel time formulas are properly applied, Alternatives 4 and 5 are found to be equally fast—or even faster—than Alternative 3. They also have far fewer impacts to existing neighborhoods. While the project offers minimal current relief for existing traffic congestion, it does provide potential long-term benefit to future residents. Ironically, the neighborhood most affected by Alternative 3—N. Country—is also the one that stands to gain the most immediate benefit, and yet its residents have consistently advocated for avoidance since the first public open house in July 2021. Despite this, their input appears to have been disregarded, with inaccuracies and omissions passed along to state and federal authorities.

A full cost analysis shows that Alternatives 4 and 5 are more cost-effective than Alternatives 1–3. However, that analysis was excluded based on inaccurate travel time assumptions—assumptions that were not grounded in formulaic math but rather Google Maps and estimates. This flaw significantly undermines the credibility of the stated rationale for selecting Alternative 3.

Of the remaining options, Alternative 4 is the fastest and slightly more cost-effective, but it lies in a floodplain and would impact more farmland. Alternative 5—34th Avenue—offers a mapped corridor, existing roadbed, owned right-of-way, and fewer disruptions to farmland or homes. For over 30 years, residents have voiced support for this route. Nearly 600 people have now formally advocated for it.

Based on all of the above, Alternative 5 (34th Avenue) should be considered the data-supported, cost-effective, community-aligned, and environmentally responsible Preferred Alternative for the East Side Corridor.

Comment #213

ESC EAW Comments #34

Foreseeable Future Expansion and Inadequate Right-of-Way

The Environmental Assessment Worksheet (EAW) fails to evaluate foreseeable future expansion of the proposed roadway and the resulting cumulative impacts. The project is repeatedly compared to 26th Street, which was initially constructed as a smaller facility and later widened to three and four lanes to accommodate increased traffic volumes. This precedent demonstrates that roadway expansion is a foreseeable outcome, not a speculative one.

Statements by county engineering staff have acknowledged that the roadway is expected to expand to three or four lanes in the future. In 2023, the County Engineer stated, *"Can you build a three- to four-lane highway in 100 feet? Yes. Is it a good idea? That's something for the commissioners to wrestle with and decide."* This admission confirms that future widening is contemplated and that the proposed **100-foot right-of-way is already constrained** for a roadway of this type.

While future expansion may not be proposed for immediate construction, it is a **reasonably foreseeable future action** that must be analyzed under MEPA. Expanding a high-speed roadway within an already limited right-of-way would intensify proximity impacts to adjacent homes, increase noise, air pollution, safety risks, and potentially require additional property acquisition or further encroachment on residential areas.

By analyzing only the initial build and ignoring foreseeable expansion, the EAW improperly segments the project and understates its long-term environmental consequences. The failure to evaluate future widening and the sufficiency of the proposed right-of-way prevents meaningful public review of cumulative impacts and long-term design risks. An **Environmental Impact Statement (EIS) is warranted** to evaluate foreseeable expansion, cumulative impacts, and reasonable alternatives before irreversible commitments are made.

The acknowledged likelihood of future roadway widening, combined with an already insufficient right-of-way, constitutes a reasonably foreseeable future action that is not analyzed in the EAW. An Environmental Impact Statement (EIS) is required to evaluate cumulative impacts, segmentation concerns, and long-term design consequences.

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Comment #214

ESC EAW Comments #6

Improper Reliance on 26th Street as a Comparator for Residential Impacts

Throughout the planning process for the East Side Corridor, elected officials, project staff, and consultants repeatedly compared the proposed roadway to 26th Street to minimize or dismiss concerns about proximity to existing homes and the need for mitigation. This comparison is not valid for purposes of environmental review and has resulted in a misleading characterization of project impacts.

26th Street was constructed **30–50 years before residential development** encroached on the roadway. In that context, the roadway constituted a pre-existing condition, and subsequent residential development occurred with knowledge of its presence. By contrast, the proposed East Side Corridor would be new construction deliberately sited immediately adjacent to established residential neighborhoods, in some locations within approximately 17 feet of existing homes. Owatonna East Side Corridor

These are materially different circumstances under MEPA and NEPA. Environmental review obligations attach to the siting and design of new public infrastructure, not to private land-use decisions made decades later. Treating these situations as equivalent improperly shifts responsibility for environmental impacts away from the project and onto residents.

MEPA and NEPA require agencies to follow a mitigation hierarchy: **avoid impacts where feasible, minimize impacts where avoidance is not feasible, and mitigate remaining impacts**. Reliance on 26th Street as a comparator bypasses this required analysis by normalizing residential proximity rather than evaluating alternatives that would increase separation from homes or avoid these impacts altogether.

To illustrate how this comparison, a brief comparison video was prepared by residents showing 26th Street and 34th Avenue as functionally similar corridors while distinguishing 29th Avenue as materially different due to its proposed placement immediately adjacent to existing homes. This video was created to reflect the framing repeatedly used by project staff and elected officials during public discussions and is illustrative only. It underscores how reliance on 26th Street shaped the public narrative by normalizing residential proximity impacts rather than prompting the required MEPA and NEPA analysis of avoidance, minimization, and mitigation.
Exhibit A – Resident-Prepared Comparison Video (YouTube, ~2 minutes):
https://youtu.be/06duEJJhoWc?si=eoxqtZK4rkBTLIwI

Given the improper reliance on historical roadway comparisons, the failure to apply the required mitigation hierarchy, and the placement of a new roadway immediately adjacent to established residential neighborhoods, the Environmental Assessment Worksheet does not adequately evaluate the potential for significant environmental effects. These unresolved issues preclude a Finding of No Significant Impact. Accordingly, the Responsible Governmental Unit should require preparation of a full Environmental Impact Statement (EIS) to ensure compliance with MEPA and to allow meaningful evaluation of alternatives and mitigation measures.

Owatonna East Side Corridor Residents

Comment #215

ESC EAW Comments #16

Procedural Misrepresentation and Improper Sequencing Between May 26 Stakeholder Meeting and May 31 Open House

This comment addresses inconsistent and misleading representations made by project representatives between the May 26 stakeholder meeting and the May 31 public open house, which undermined meaningful public participation and informed environmental review.

At the May 26 stakeholder meeting, residents were explicitly told that **all alternatives were still under study** and that alignment selection had not yet been determined. Project representatives indicated that it was **up to residents to propose their own mitigation measures**, despite the fact that mitigation feasibility and effectiveness are core components of environmental analysis that must be evaluated by the Responsible Governmental Unit.

When residents asked specifically about **noise impacts**, project representatives responded dismissively, stating words to the effect of:

> *"Are you talking about a noise wall? You don't want a noise wall. Those are for major projects like I-35 and Highway 14."*

This response minimized foreseeable noise impacts, discouraged discussion of mitigation, and materially misrepresented the applicability of noise mitigation measures for a project of this scale and proximity to residences.

As a direct result of this exchange, residents understood that noise impacts were being downplayed and that mitigation analysis was either premature or unnecessary — despite the project's extreme proximity to homes.

However, **just five days later**, at the May 31 public open house, the public was presented with **only a single alternative**, indicating that alignment selection had already occurred. This contradicted representations made at the May 26 stakeholder meeting, just 5 days prior, and deprived residents of a meaningful opportunity to comment on alternatives or mitigation strategies before a preferred alternative was effectively advanced.

This rapid shift — from "all alternatives still under study" on May 26 to presentation of only one alternative on May 31 — demonstrates improper sequencing and undermines the integrity of the environmental review process. Public participation was rendered illusory because residents were discouraged from raising mitigation concerns and then presented with a predetermined outcome before such concerns could be meaningfully evaluated.

Under MEPA, public participation must occur early and continuously, before decisions are made and positions harden. The inconsistency between these two meetings supports a conclusion that the Environmental Assessment Worksheet fails to reflect a transparent, good-faith alternatives and mitigation analysis and warrants preparation of an Environmental Impact Statement.

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Comment #216

ESC EAW Comments #32

Improper Intergovernmental Sequencing and Proxy Limitation of Alternatives

This comment is being submitted to document a serious procedural failure involving the timing, coordination, and effect of actions taken by Steele County and Owatonna Township that improperly limited project alternatives during ongoing environmental review, in violation of Minn. R. 4410.3100.

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1. Township Meeting Schedule Makes Independent Action Implausible

According to the official Township schedule, **Owatonna Township holds its regular meeting on the second Wednesday of each month and Planning & Zoning meetings on the fourth Wednesday**, both at 7:30 p.m.

No Township meeting was scheduled for **May 13, 2025**, other than the regularly scheduled second-Wednesday meeting occurring later that evening.

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2. Township Resolution Was Executed Before Any Township Meeting

Despite the lack of a scheduled meeting, a Township resolution **limiting project alternatives** was **signed on May 13, 2025**, prior to:

- any Township meeting that day, and
- prior to the next regularly scheduled Township meeting.

The resolution explicitly constrained alternatives to those associated with **Preferred Alternative 3**, thereby narrowing the range of alternatives during environmental review.

The timing alone establishes that this resolution did not result from public deliberation at a duly noticed Township meeting.

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3. Resolution Originated Through County Processes

The Township resolution indicates that it arose from or was associated with the **Public Works Committee**, which met on **May 13, 2025 at 8:00 a.m.**

This meeting occurred:

- before any Township meeting that day, and

- before any duly scheduled Township meeting, based on the Township's published meeting calendar.

The sequence indicates that the limitation of alternatives originated at the County level and was later formalized through Township action, rather than independently developed by the Township through its own public process.

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4. County Accepted the Resolution Without Vote or Deliberation

At the **May 27, 2025 Steele County Board meeting**, the Township resolution was listed on the agenda and was **quietly accepted without a recorded vote, motion, or deliberation**, as reflected in:

- the County Board agenda,
- the official minutes (which contain no vote or discussion), and
- the publicly available meeting video showing acknowledgment without formal action. https://youtu.be/_cbAoRVYVkA?si=1HP1ldZKPHOmZXUi&t=2153 (35:36)

By accepting the resolution without a vote, the County effectively incorporated a limitation on alternatives into its decision-making framework while environmental review was still ongoing.

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5. Advance Federal and Internal Warnings Were Ignored

These actions are especially concerning because **advance warnings had already been communicated internally**.

On **April 23**, the County Administrator stated in an email to the County Engineer that there needed to be a three-party agreement on project location and that a public meeting should occur. The County Engineer responded that the **Federal Highway Administration (FHWA) explicitly stated that no votes or actions limiting alternatives should occur prior to completion of environmental review**.

Despite this warning:

- a Township resolution limiting alternatives was executed,
- the County accepted that resolution without vote, and
- subsequent actions continued to narrow alternatives.

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6. Effect on Environmental Review Integrity

Taken together, these actions demonstrate a coordinated sequence in which:

- alternatives were limited through intergovernmental resolutions,
- those resolutions occurred outside normal public meeting processes,
- the County relied on those actions without independent deliberation, and
- all occurred while environmental review was ongoing.

This pattern constitutes **predetermination by proxy** and materially prejudices the consideration of alternatives, in direct violation of Minn. R. 4410.3100.

Environmental review cannot function as intended where outcomes are incrementally fixed through distributed actions across jurisdictions while avoiding formal votes or accountability by the Responsible Governmental Unit.

Conclusion

The Township resolution, its timing relative to scheduled meetings, its origin in County processes, and its acceptance by Steele County without vote—despite advance federal warnings—demonstrate that project alternatives were improperly constrained before environmental review was complete.

These procedural failures independently support rejection or supplementation of the EAW and the preparation of a full Environmental Impact Statement (EIS).

This comment is submitted for inclusion in the official EAW record.

Owatonna East Side Corridor Residents
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Attachments:
Township Meeting Schedule
May 27, 2025 Agenda including: agenda, township resolution, public works committee minutes
May 27, 2025 Minutes
April 23, 2025 Email

Steele County Townships
Meeting Schedule

Township	Monthly Meeting Day	Time
Aurora	1st Monday	7:30 PM (September & July meeting Second Monday)
Berlin	2nd Monday	7:00 PM
Blooming Prairie	1st Tuesday	November-April 7:00 PM May-October 8:00 PM
Clinton Falls	3rd Monday	6:00 PM
Deerfield	2nd Tuesday	8:00 PM
Havana	1st Thursday	6:00 PM
Lemond	2nd Monday	7:00 PM
Medford	2nd Tuesday	7:30 PM
Meriden	2nd Tuesday	7:00 PM (5:00 PM Dec, Jan & Feb.)
Merton	1st Thursday	7:30 PM
Owatonna	2nd Wednesday Regular Meeting 4th Wednesday Planning & Zoning	7:30 PM
Somerset	2nd Wednesday	7:00 PM
Summit	1st Tuesday	November-April 7:00 PM May-October 8:00 PM

STEELE COUNTY BOARD AGENDA

Administration Center - 630 Florence Avenue – Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

TUESDAY, MAY 27, 2025 at 5:00 PM
County Boardroom, Steele County Administration Center

Persons with background material for agenda items are asked to provide them to the Administrator's Office 5 days prior to the meeting date so that the material can be linked to the online agenda. If handouts at the Board meeting are necessary, please bring enough copies for the Board, county staff, the press and the public. Generally, 15 copies should be sufficient.

Agenda

1. Call to Order
2. Pledge of Allegiance
3. Approve Agenda

Correspondence

Public Comment

Those wishing to speak must state their name and address for the record after they are acknowledged by the Board Chair. Each person will be limited to two (2) minutes to make his/her remarks.

Speakers will address all comments to the Board as a whole and not one individual commissioner. The Board may not take action on an item presented during the Public Comment period, unless the item is already on the agenda for action. When appropriate, the Board may refer inquiries and items brought up during the Public Comment period to the County Administrator for follow-up.

Consent Agenda - *Items listed on the Consent Agenda are considered routine and non-controversial by the County Board. There will be no separate discussion of these items unless requested by a member of the County Board.*

4. Approve May 13, 2025 Board Minutes (pg. 4)
5. Approve May 13, 2025 Board Work Session Minutes (pg. 12)
6. Approve Bills (pg. 14)
7. Approve Personnel Report (pg. 41)

8. Approve the amendment to the 2024-2025 Remote Electronic Alcohol Monitoring (REAM) Grant Contract Agreement extending the agreement through 2027 for a total of $18K ($9K per year for the next two years) and authorize the CC Director to sign. (pg. 42).
9. Approve an Interagency Agreement between Owatonna Police Department & Steele County Community Corrections and authorize the CC Director to sign. (pg. 47)
10. Approve an Interagency Agreement between Steele County Sheriff's Department & Steele County Community Corrections and authorize the CC Director to sign. (pg. 51)
11. Approve MNIT Management Control Agreement and authorize the CC Director to sign. (pg. 55)
12. Adopt **Resolution 2025-028** approving the 2024 Steele County Hazard Mitigation Plan (pg. 57)
13. Adopt **Resolution 2025-029** requesting the transfer excess State Aid Municipal to the State Aid regular funds and authorize the chair to sign. (pg. 62)
14. Approve an annual renewal of Tobacco Licenses for Anhorn's Gas & Tire, Casey's-Medford, Casey's-Ellendale, Medford Municipal Liquor Store and Lerberg's Foods. (pg. 64)

General Agenda

15. Award a contract for the CSAH 28 (MN 30 to CSAH 21) Reclamation project to Ulland Brothers Inc. in the amount of $586,477.08. (pg. 65)
16. Award a contract for 2025 pavement marking, CP 074-025-001, to KAMCO, Inc. in the amount of $266,874.05. (pg. 66)
17. Approve Amendment to agreement with WHKS for professional services for the CSAH 28 (South Beaver Lake Road to North Beaver Lake Road) and Beaver Lake Park Improvement project in the amount of $490,000. (pg. 67)
18. Adopt **Resolution 25-030** for Safe Streets for All Funding to Develop a Comprehensive Safety Action Plan. (pg. 73)

County Board Work Session – Tuesday, May 27, 2025

19. Action Items

Public Works Committee- Tuesday, May 13, 2025

20. Accept the CR 180 Bridge 4686 Preliminary Design Analysis (pg. 76)

Public Safety& Health Committee – Tuesday, May 20, 2025

21. Approve On-Sale Liquor License for Spurgy's Trailside Tavern. (pg. 124)

21a. Approve agreement with Alan Goodman to serve as Interim Engineer during County Engineer vacancy (See Appendix)

Information Items

22. Town Board of Owatonna Township Resolution regarding the East Side Corridor (pg. 125)

23. 2024 Highway Department Annual Report (pg. 127)

24. Public Safety & Health Committee Minutes – Tuesday, May 20, 2025 (pg. 208)

25. Public Works Committee Minutes – Tuesday, May 13, 2025 (pg. 210)

Commissioner Reports:

Next Meeting Notices:

Internal Central Services – **Tuesday, June 3rd at 8 a.m. in the Boardroom**

Property & Maintenance Committee – **Thursday, June 5th at 8 a.m. in the Boardroom**

AMC Region 9 meeting - **Monday, June 2nd at 8:00 a.m. in Lake City - City Hall**

Public Works Committee – **Tuesday, June 10th at 8 a.m., Public Works Facility**

County Board Work Session – **Tuesday, June 10th at 4 p.m. in the Boardroom** County Board Meeting – **Tuesday, June 10th at 5 p.m. in the Boardroom**

Closed Session for attorney/client privilege for threatened or pending litigation, pursuant to Minn. Stat. § 13D.05, Subd. 3(b)"

Motion to go into closed Session

Discussion

Motion to end closed Session

Action Item if necessary

Adjourn

Disclaimer: This agenda has been prepared to provide information regarding an upcoming meeting of the Steele County Board of Commissioners. This document does not claim to be complete and is subject to change.

Steele County Agenda Item

Informational

Subject: Town Board of Owatonna Township Resolution regarding the East Side Corridor

Department: Highway

Committee: Public Works **Committee Meeting Date:** NA

Work Session Date: NA **Board Meeting Date:** May 27, 2025

Purpose:

To provide feedback from the Town Board of Owatonna Township regarding the East Side Corridor project.

Background:

As the County is completing the environmental documents required for the East Side Corridor project, the Town Board of Owatonna Township has reviewed the Purpose and Need, Evaluation Criteria, and Evaluation of Alternatives Memorandums that have been completed in preparation of the environmental documents. The Evaluation of Alternatives Memorandum has identified Alternative 3 as the Preferred Alternative that will be further analyzed in the environmental documents. The East Side Corridor project will be mostly located in Owatonna Township. The Town Board adopted a resolution to provide feedback on the project especially related to the impacts that the project will have on the township and its constituents.

Financial Impacts:

NA

Attachments:

Town Board of Owatonna Township Resolution Adopted May 13, 2025

RESOLUTION

TOWN BOARD OF OWATONNA TOWNSHIP

WHEREAS, the Town and the City have annually adopted an orderly Annexation Agreement to provide land areas for the growth of the City and further, to provide for the protection of agricultural and other lands within the Township from urban and suburban development and to promote an organized framework for systematic annexation, and part of that agreement, the Township does not support non-farm use of the properties in the growth area, and

WHEREAS, the Preferred Alternative is largely in the defined growth areas and has less farmland impacts than the alternatives further east, and

WHEREAS, the Preferred Alternative keeps development from leapfrogging into non developed area and keeps development near existing city limits, and

WHEREAS, the Preferred Alignment best supports existing and near-term City development while preserving farmland further east, and

WHEREAS, the city dedicated land on the east side of the North County Additions 1, 2, and 3 plats preserving land for the route, and that land is already out of farmland production, further protecting additional farmland from being removed from production through other alternative routes, and

WHEREAS, Alternatives 4 and 5 presented in the environmental documents have greater farmland impacts, and would encourage development outside of the annexation agreement development areas.

NOW, THEREFORE, BE IT RESOLVED, the township does not support any other alternatives that impact farmland outside of orderly annexation agreement areas, or that do not use already-dedicated lands for the route.

BE IT FURTHER RESOLVED the Township requests that the County and City follow their previous significant planning efforts and agreements to preserve farmland and promote the orderly growth of the City.

BE IT FURTHER RESOLVED the Township supports the selection of the preferred alternative, identified as Alternative 3 as shown in the federal and state environmental documents, and commonly referred to as the 29th Avenue alignment.

ADOPTED 5-13-25 **, 2025.**

OWATONNA TOWNSHIP BOARD
Steele County, Minnesota

By: Jeremy Kathrens
Chairman

ATTEST:

By: Laurie Ellis
Township Clerk

CERTIFICATION

I hereby certify that the above *is* a true and correct copy of a Resolution duly passed, adopted, and approved by the Owatonna Township Board on the 13th day of May, 2025.

Laurie Ellis
Township Clerk

STEELE COUNTY
PUBLIC WORKS POLICY COMMITTEE MINUTES
Public Works Building – 3000 Hoffman Drive - Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

Tuesday, May 13, 2025 at 8:00 a.m. – Public Works Conference Room

Attendees: Commissioner Krueger, Commissioner Prokopec, County Engineer Paul Sponholz, Four Seasons Director Steve Schroht, Landfill Supervisor Josh Johnson, Finance Director Candi Lemarr, Highway Maintenance Supervisor Paul Kirst, STS Specialist Katie Barden, Administrator Renae Fry and Executive Assistant Rebecca Kubicek.

Consent:

1. Adopt a Resolution requesting to transfer excess State Aid Municipal to the State Aid Regular funds.

   Requesting excess funds be moved to highway general fund so the state does not take the funds back. Request for a move of $650K.

General:

2. Accept recommendation of the CR 180 Bridge 4686 Preliminary Design Analysis

   Since CR 180 is prone to flooding, a hydraulic study was done. WHKS recommends replacing the bridge and box culvert to obtain the vertical clearance needed on this road for larger vehicles. Steele County will need to take ownership of the bridge. Repairs will be eligible for funding under the state bonding program. Owatonna will be responsible for its share of the costs of repairs to the bridge approach. Asking the Commissioners to accept the findings of the report and eventually approve design work so it can be on the list for state bonding. This work is expected to occur in 2030.

Information:

3. Introduce the DRAFT 2026-2030 Highway Capital Improvement Plan

   Projects to be included in the 2026 budget will be discussed during the budget setting process. The 2026 budget/levy will include costs associated with the Beaver Lake project (park). Steele County received a grant for boat parking and improvements to the boar launch amounting to $127K. Paul indicated that the land acquisition process for areas impacted by the Beaver Lake project has begun.

   County Engineer reviewed the upcoming projects, covered the highlights of the projects, and advised where funding would be coming from. Main Street project has been moved up to use funding.

   The Public Hearing necessary to approve changes to the local option sales tax plan will be held this fall.

4. 2024 Highway Department Annual Report

   Paul summarized this statutorily required report.

5. Landfill Demo Relocation

Josh reported that all demolition waste has been relocated. Grass seeding is underway and we should see final plans soon for the landfill. Would like to have construction completed before winter.

Highway Updates:

CSAH 2/43 - Going to the Board 5-13 requesting approval to amend contract with WHKS to prepare final design.

East Side Corridor - Federal funding was moved to Main Street project. WSB is working on the EAW and related analysis. Once the information is completed, there will be a public meeting.

CSAH 48 Roundabout at the Highschool - Railroad has signed a contract, and the contract is going to the Board on May 13th. The completion date of this project should be this year.

CR 180 School Street RR crossing – SHE will be finalizing plans for the installation of the crossing gate and trail improvements.

County Road Safety Plan - Intersection lights will be installed this year.

Safe Streets for All (SS4A) grant. - Highway would like to reapply for the upcoming grant.

Department Head Reports

Environmental show: Vendors seemed happy with the show. There was a good turnout with $1,140.50 going to charity.

Four Seasons: They are busy every weekend. Each event has been rebooked for next year. Blades have been sold and everything is moving forward. Ice time remains being booked. Water levels are up at Beaver Lake. Fairgrounds underground electrical is still being installed.

PROCEEDINGS OF THE STEELE COUNTY BOARD OF COMMISSIONERS

REGULAR SESSION May 27, 2025

STATE OF MINNESOTA }
} ss
COUNTY OF STEELE }

The Steele County Board of Commissioners met in Regular Session at 5:00 p.m. on May 27, 2025 with Commissioner's Krueger, Brady, Glynn, Prokopec, and Abbe present. Also present were Human Resources Director Gina McGuire, Finance Director Candi Lemarr, IT Director Dave Purscell, County Engineer Paul Sponholz, County Sheriff Lon Thiele, County Attorney Robert Jarrett, Emergency and Risk Management Director Kristen Sailer, County Administrator Renae Fry and Executive Assistant Rebecca Kubicek.

Call to order and Pledge of Allegiance.

Motion by Commissioner Krueger, seconded by Commissioner Abbe to approve the agenda with amendments. Ayes all.

Amendments to the agenda:

Add item from Work Session:

Proposal to restructure Public Works leadership and authorized the hiring of a new Public Works Director and County Engineer.

Presentation: None

Comments and Correspondence:

Public Comment: 2 persons spoke regarding Eastside corridor.

Correspondence: None

Consent Agenda:

Motion by Commissioner Glynn, seconded by Commissioner Prokopec to approve Consent Agenda. Ayes all.

A. Approve the minutes of May 13, 2025 Board Meeting
B. Approve the minutes of May 13, 2025 Board Work Session
C. Approve Bills
D. Approve the Personnel Report

New Hires/Promotions/Demotions/Transfers:

Name	Position/Dept.	Rating/Step	Date
Jordyn Williams	Appraiser I/Assessor	C41/1	06/09/2025
Autumn Hagemeyer	Assist. Cnty Attorney I/Attorney	C45/4	07/07/2025

Resignations/Retirements/Terminations:

Name	Position	Department	End Date
Dale Oolman (Retirement)	Director of P&Z	Planning & Zoning	06/13/2025

Open Positions-Pending Board Approval:

Position	Department	Notes
IT Security Analyst	IT	Working on Job Description
Patrol Deputy	Sheriff's Office	Backgrounding
Correctional Officer	Detention Center	Backgrounding
Procurement Specialist	Finance	Interviewing
Engineering Techs I/II/III (3)	Highway	On-hold
Hwy Maintenance Technician	Highway	Interviewing
Accounting Support Specialist	Highway	On-hold
Accountant	Highway	Interviewing
Assistant County Engineer	Highway	On-hold
County Engineer	Highway	Determining Next Steps
Technical Clerk II	PT & E	On-hold
RN/PHN	Public Health	Backgrounding
Director of Planning & Zoning	Planning & Zoning	Recruiting will begin soon

E. Approve the amendment to the 2026-2027 Remote Electronic Alcohol Monitoring (REAM) Grant Contract Agreement for a total of $18K ($9K per year for the next two years) and authorize the CC Director to sign.

F. Approve an Interagency Agreement between Owatonna Police Department & Steele County Community Corrections.

G. Approve an Interagency Agreement between Steele County Sheriff's Department & Steele County Community Corrections.

H. Approve MNIT Management Control Agreement.

I. Adopt **Resolution No. 2025-028** approving the 2024 Steele County Hazard Mitigation Plan. A copy of the Resolution is available in the office of the County Administrator and is made a part of this record by reference.

J. Adopt **Resolution No. 2025-029** requesting the transfer excess State Aid Municipal to the State Aid regular funds and authorize the chair to sign. A copy of the Resolution is available in the office of the County Administrator and is made a part of this record by reference.

K. Approve an annual renewal of Tobacco Licenses for Anhorn's Gas & Tire, Casey's-Medford, Casey's-Ellendale, Medford Municipal Liquor Store and Lerberg's Foods.

General Agenda:

Motion by Commissioner Krueger, seconded by Commissioner Glynn to award a contract for the CSAH 28 (MN 30 to CSAH 21) Reclamation project to Ulland Brothers Inc. in the amount of $586,477.08. Ayes all. (bids were open in May vs April as stated)

Motion by Commissioner Prokopec, seconded by Commissioner Glynn to award a contract for 2025 pavement marking, CP 074-025-001, to KAMCO, Inc. in the amount of $266,874.05. Ayes all.

Motion by Commissioner Abbe, seconded by Commissioner Prokopec to approve Amendment to agreement with WHKS for professional services for the CSAH 28 (South Beaver Lake Road to North Beaver Lake Road) and Beaver Lake Park Improvement project in the amount of $490,000. Ayes all.

Commissioner Krueger offered the following **Resolution No. 2025-030** for Safe Streets for All Funding to Develop a Comprehensive Safety Action Plan, seconded by Commissioner Abbe. Upon the vote being taken, five Commissioners voted in favor thereof, none absent and not voting. A copy of the Resolution is available in the office of the County Administrator and is made a part of this record by reference.

Motion by Commissioner Krueger, seconded by Commissioner Prokopec to approve the restructuring of the Public Works Leadership Team and authorized the hiring of a new Public Works Director and County Engineer. Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Krueger to approve agreement with Alan Goodman to serve as Interim Engineer until a new county engineer is hired.

Motion by Commissioner Krueger, seconded by Commissioner Prokopec to accept the CR 180 Bridge 4686 Preliminary Design Analysis. Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Abbe to approve On-Sale Liquor License for Spurgy's Trailside Tavern. Ayes all.

Commissioner Reports:

Commissioner Glynn reported his attendance at Historical Society meeting.

Commissioner Prokopec reported his attendance at JD24 special meeting, Interim Engineering interview meeting, Public Safety and Health Committee, Memorial Day parade, and a Work Session.

Commissioner Abbe reported his attendance at MNP Finance and JBP meetings, Memorial Day parade and program.

Commissioner Krueger reported his attendance at Smart Trails meeting, JD24 meeting, Interim Engineering interview meeting, MNP Finance and JBP meetings, Memorial Day parade and service and Work Session.

Commissioner Brady had no report.

County Attorney reported received grant for 3 staff next year truancy prevention program through uplift. United way to be the fiscal agent.

County Administrator reported the start of labor negotiations where they have met with three of the bargaining units. They plan to have tentative agreements in place by the end of August.

LISTING OF BILLS
May 27, 2025

Canadian Pacific Kansas City	26,000.00
Counties Providing Technology	4,701.00
CPS Technology Solutions	3,735.00
Crysteel Truck Equipment Inc	2,700.00
Design Electric Inc	5,011.33
DLT Solutions LLC	5,537.28
Erickson Engineering Co LLC	13,270.64
High Point Networks	2,355.00
LSQ Funding Group Lc	4,169.50
MEI Total Elevator Solutions	7,088.85
Minnesota Paving & Materials	3,396.54
Moore Md/Kellyanna J	4,099.58
Office of MN IT Services	3,720.96
R & K Electric Inc	4,443.00
Rice County Finance Department	23,176.45
Rice-Steele 911 Center	4,999.80
Road Machinery & Supplies Co	79,927.05
Roemhildt/Brenda	3,970.00
Short Elliott Hendrickson Inc	8,633.67
South Central College	2,160.00
Steele County Soil & Water Conserv Dist	33,750.00
Stewart Sanitation	2,094.82
Street Smart Rental	3,384.00
Summit Food Services LLC	4,297.11
Thomson Reuters - West	2,716.54
UKG Kronos Systems LLC	3,670.08
Weinberg Construction LLC	2,358.00
WHKS & Co	3,718.08
104 Payments less than 2000	29,743.20
Final Total:	**298,827.48**

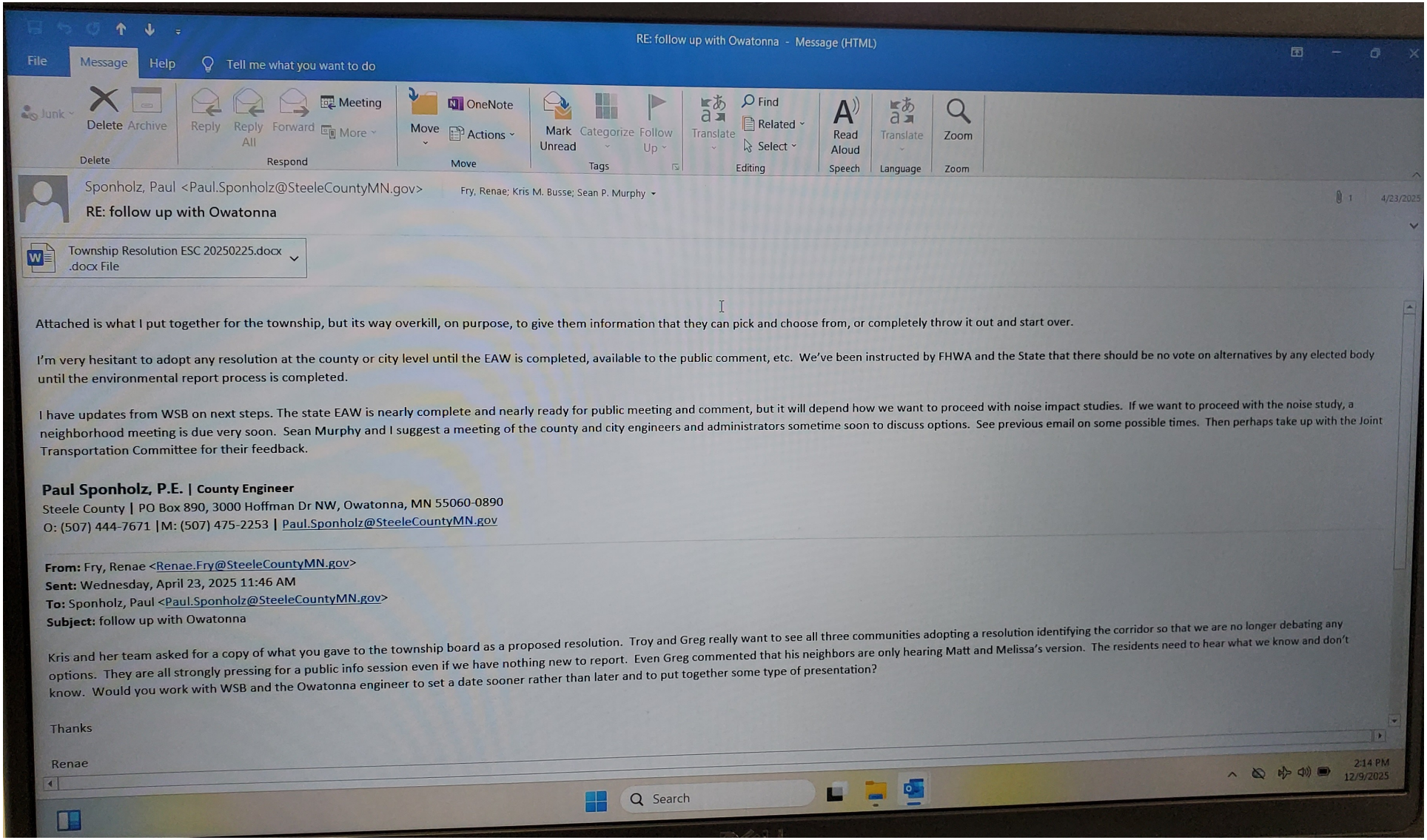
Motion by Commissioner Abbe, seconded by Commissioner Krueger to go into closed session for attorney / client privilege for threatened or pending litigation, pursuant to Minn Stat. 13D.05, Subd. 3(b). Ayes all.

Motion by Commissioner Glynn, seconded by Commissioner Krueger to end closed session. Ayes all.

Motion by Commissioner Abbe, seconded by Commissioner Krueger to adjourn to the Call of the Chair at 7:37p.m. Ayes all.

James Brady
CHAIRMAN

ATTEST: Rena J
ADMINISTRATOR


RE: follow up with Owatonna - Message (HTML)
File
Message
Help
Tell me what you want to do
Junk
Delete
Archive
Reply
Reply All
Forward
Meeting
More
Move
OneNote
Actions
Mark Unread
Categorize
Follow Up
Translate
Find
Related
Select
Read Aloud
Translate
Zoom
Delete
Respond
Move
Tags
Editing
Speech
Language
Zoom
Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Fry, Renae; Kris M. Busse; Sean P. Murphy
4/23/2025
RE: follow up with Owatonna
Township Resolution ESC 20250225.docx
.docx File
Attached is what I put together for the township, but its way overkill, on purpose, to give them information that they can pick and choose from, or completely throw it out and start over.
I'm very hesitant to adopt any resolution at the county or city level until the EAW is completed, available to the public comment, etc. We've been instructed by FHWA and the State that there should be no vote on alternatives by any elected body until the environmental report process is completed.
I have updates from WSB on next steps. The state EAW is nearly complete and nearly ready for public meeting and comment, but it will depend how we want to proceed with noise impact studies. If we want to proceed with the noise study, a neighborhood meeting is due very soon. Sean Murphy and I suggest a meeting of the county and city engineers and administrators sometime soon to discuss options. See previous email on some possible times. Then perhaps take up with the Joint Transportation Committee for their feedback.
Paul Sponholz, P.E. | County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov
From: Fry, Renae <Renae.Fry@SteeleCountyMN.gov>
Sent: Wednesday, April 23, 2025 11:46 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: follow up with Owatonna
Kris and her team asked for a copy of what you gave to the township board as a proposed resolution. Troy and Greg really want to see all three communities adopting a resolution identifying the corridor so that we are no longer debating any options. They are all strongly pressing for a public info session even if we have nothing new to report. Even Greg commented that his neighbors are only hearing Matt and Melissa's version. The residents need to hear what we know and don't know. Would you work with WSB and the Owatonna engineer to set a date sooner rather than later and to put together some type of presentation?
Thanks
Renae
Search
2:14 PM
12/9/2025

Comment #217

ESC EAW Comments #2

EAW COMMENT — Incompatible Land Uses and Property Value Impacts

The EAW fails to evaluate the combined impacts of introducing **high-intensity land uses**—including a new roadway/highway facility and proposed mixed-use or commercial development—adjacent to **established residential neighborhoods**.

Planning and appraisal literature consistently recognize that proximity to highways and commercial uses can **reduce residential property values**, particularly for homes directly adjacent to the use, due to noise, vibration, air emissions, traffic, lighting, safety concerns, and loss of privacy. These impacts are not temporary and are not fully mitigated by berms or noise walls.

The EAW does not analyze property value impacts, land-use compatibility, or whether appropriate setbacks, buffering, or planning standards exist to protect existing neighborhoods before intensifying adjacent land uses. Proceeding without this analysis understates socioeconomic and environmental impacts and prevents meaningful public review.

Because these impacts are foreseeable, permanent, and disproportionately borne by existing residents, the EAW is incomplete. A full Environmental Impact Statement (EIS) is necessary to evaluate land-use compatibility, property value impacts, avoidance alternatives, and cumulative effects before any irreversible decisions are made.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #218

ESC EAW Comments #5

Indirect and Cumulative Impacts, Residential Displacement Risk, and Request for Environmental Impact Statement

We submit this group comment to object to the adequacy of the Environmental Assessment Worksheet (EAW) for the East Side Corridor project and to formally request preparation of an Environmental Impact Statement (EIS).

Failure to Analyze Reasonably Foreseeable Indirect and Cumulative Impacts

The EAW fails to analyze reasonably foreseeable indirect and cumulative impacts associated with placing a high-capacity roadway immediately adjacent to established residential neighborhoods. While the project does not propose demolition of homes at this time, MEPA requires analysis of **reasonably foreseeable long-term consequences**, not only the initial construction footprint.

Transportation infrastructure projects are long-lived public investments. Where roadways are placed in extremely close proximity to homes, it is reasonably foreseeable that future actions—such as roadway widening, safety and operational modifications, intersection expansions, drainage retrofits, and noise mitigation—will be required over the life of the facility. These actions have already been discussed in public meetings and commonly necessitate additional right-of-way acquisition, resulting in incremental residential displacement or buyouts over time.

Here, the proposed East Side Corridor would place a major roadway in substandard right of way within approximately **17 feet of existing residences**. This proximity creates unresolved questions regarding:

- Long-term compatibility of residential land uses with roadway operations
- Cumulative neighborhood impacts over the lifespan of the corridor
- Whether future safety, operational, or mitigation measures would require additional property acquisition
- Whether avoidance-based alternatives could reduce or eliminate these risks

The EAW does not analyze these impacts and therefore understates the project's true human and environmental consequences.

Minnesota Precedent Demonstrates Foreseeability

Minnesota's own transportation history demonstrates that long-term residential displacement resulting from roadway placement is not speculative. The **Rondo Neighborhood** provides a well-documented example in which construction of Interstate 94 destroyed homes, dismantled an established residential community, and resulted in cumulative neighborhood displacement over time.

While the East Side Corridor is not an interstate, it presents the **same underlying conditions on a smaller scale**: placement of a high-capacity roadway immediately adjacent to existing homes, creating foreseeable long-term pressures related to safety, noise, access, and future right-of-way needs. Under MEPA, the difference in scale does not negate the foreseeability of indirect and cumulative impacts.

As documented in **Attachment A** (KARE-11, *"Rondo neighborhood gets apologies for I-94"*) and **Attachment B** (City of Saint Paul Transportation Committee Packet, August 13, 2018 – *Rethinking I-94*

Phase 1 Executive Summary), Minnesota transportation officials have formally acknowledged that prior highway projects caused long-term community harm and displacement beyond what was disclosed at the outset. The official planning packet explicitly recognizes that I-94 construction destroyed homes and dismantled the Rondo neighborhood and includes a public apology by MnDOT leadership for past transportation policies and practices.

Decades later, Minnesota taxpayers and public agencies are investing significant public resources to acknowledge, repair, and mitigate the lasting harms caused by those decisions, including community disruption, loss of housing, and long-term social and economic impacts. The East Side Corridor presents the same displacement-risk conditions on a smaller scale. Steele County is proposing a project that would replicate **these documented types of harm**—noise, safety conflicts, land-use incompatibility, and long-term displacement pressure—without fully analyzing those impacts upfront as required under MEPA.

These materials are submitted **not to allege intent**, but to demonstrate that such outcomes are **reasonably foreseeable** and may not be dismissed as speculative under MEPA.

Formal Request for Environmental Impact Statement (EIS)

Because the EAW fails to analyze reasonably foreseeable indirect and cumulative impacts—including long-term residential displacement risk, land-use incompatibility, and future right-of-way pressures—the significance of the project's environmental effects remains unresolved.

An Environmental Impact Statement (EIS) is required to:

1. Evaluate indirect and cumulative residential displacement risks over the life of the roadway
2. Analyze long-term neighborhood stability and land-use impacts
3. Compare avoidance-based alternatives that do not place high-capacity infrastructure immediately adjacent to homes
4. Assess whether mitigation measures can realistically address impacts without additional property acquisition
5. Provide meaningful public participation before irreversible commitments are made

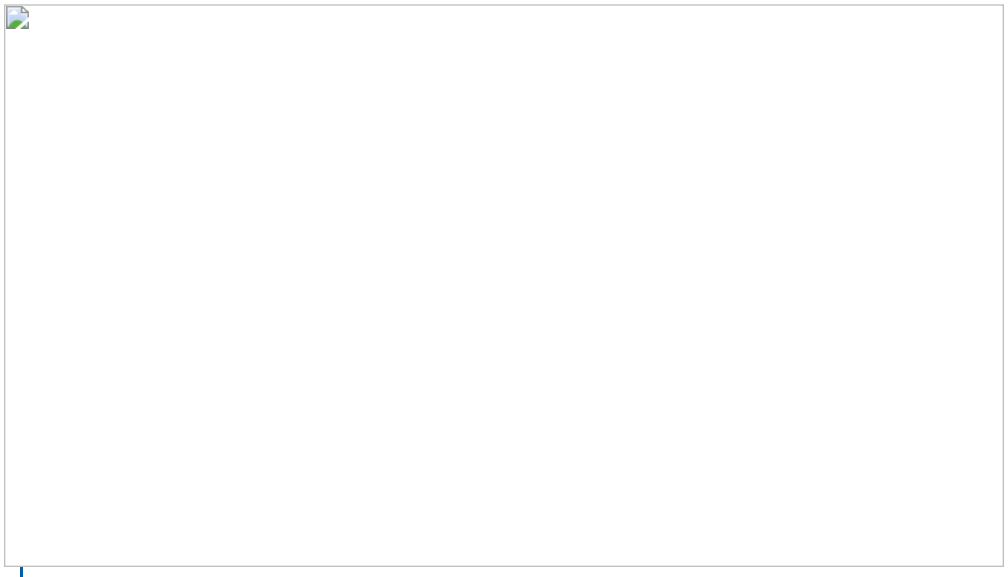
Absent preparation of an EIS, decision-makers and the public lack the information MEPA requires to evaluate the project's full environmental consequences. Accordingly, we request that the Responsible Governmental Unit order preparation of an Environmental Impact Statement prior to any further approvals or commitments.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

LOCAL

Rondo neighborhood gets apologies for I-94

Residents past and present of the old Rondo neighborhood got something they have waiting seven decades for...an apology.



Rondo dedication

Author: **Allen Costantini and KARE (KARE)**
Published: **10:55 PM CDT July 17, 2015**
Updated: **10:55 PM CDT July 17, 2015**

ST. PAUL, Minn. – Residents past and present of the old Rondo neighborhood got something they have waiting seven decades for...an apology. The Rondo section of the city of St. Paul was obliterated in the 1950s by the construction of I-94 between the Twin Cities downtowns.

The building of the freeway divided the African-American community destroying an estimated 600 homes and 300 businesses. Rondo Avenue, itself, disappeared.

Ad 1 of 1

00:00 / 00:00

IN OTHER NEWS

The American Swedish Institute celebrates its 75th annual holiday exhibition

Sponsored Links

7 Estate Planning Tips: Transfer Your Assets Where and When You Want

Fisher Investments

Learn More

"An era when the Minnesota Highway Department built an interstate through the heart of the Rondo Community," noted Charles Zelle, Minnesota Commissioner of Transportation. "We would never, we could never, build that kind of atrocity today."

Zelle then apologized on behalf of his department. Dozens gathered on Friday at the corner of Concordia and Fisk in St. Paul on the frontage road above the highway to hear about plans to transform the vacant lot into Rondo Plaza. It will have monuments and exhibits to educate groups about the neighborhood that once stood there. U.S. Representative Betty McCollum joined with some residents old enough to have walked the streets of Rondo and others for whom the street is just history.

"Today we acknowledge the sins of our past," said Chris Coleman, Mayor of St. Paul. "We regret the stain of racism that allowed so callous a decision as the one that led to family being dragged from their homes creating a diaspora of the African-American community in the City of Saint Paul."

Ad removed. Details

Coleman declared July 17th "Rondo Remembrance and Reconciliation Day" in St. Paul. Then, Coleman went one unprecedented step further.

"Today as Mayor of Saint Paul, I apologize, on behalf of the city, to all who call Rondo home," said Coleman, "for the acts and decisions that destroyed this once vibrant community."

The two day Rondo Days festival begins Saturday in St. Paul.

PLANNING COMMISSION

Betsy Reveal, Chair

CITY OF SAINT PAUL
Melvin Carter, Mayor

25 West Fourth Street
Saint Paul, MN 55102

Telephone: 651-266-6700
Facsimile: 651-228-3220

TRANSPORTATION COMMITTEE OF THE PLANNING COMMISSION

Monday, August 13, 2018, 4:00 p.m. – 5:30 p.m.
All meetings are held in the City Hall Annex 13th floor
Conference room at 25 West 4th Street in Saint Paul

1. Rethinking I-94 Phase I Study – Gloria Jeff (MnDOT) 45 minutes
2. Parking Zoning Study – Tony Johnson (PED) 45 minutes

Upcoming Transportation Committee Meetings

- ~~August 27~~ cancelled- no items
- September 10
- September 24

Meetings are open to the public. The Chair may allow five minutes for informal public comment (from non-committee members) at the beginning of each agenda as needed. Additional time may be allocated for comments or further discussion at the discretion of the Chair. Meetings will be cancelled if there is not a quorum expected, or if there are no agenda items. For additional information on the Transportation Committee of the Planning Commission, please visit our website at bit.ly/StPaulTC or contact Bill Dermody at Bill.Dermody@ci.stpaul.mn.us or 651-266-6617.

Transportation Committee Staff Report for Projects

Committee date: 8/13/2018

Project Name: Rethinking I-94

Geographic Scope: I-94 between downtown Minneapolis and Downtown St. Paul, and slightly beyond

Project Contact: Gloria Jeff, Gloria.Jeff@state.mn.us

Project Webpage: http://www.dot.state.mn.us/I-94minneapolis-stpaul/index.html
The recently released Phase I Report is linked via the webpage

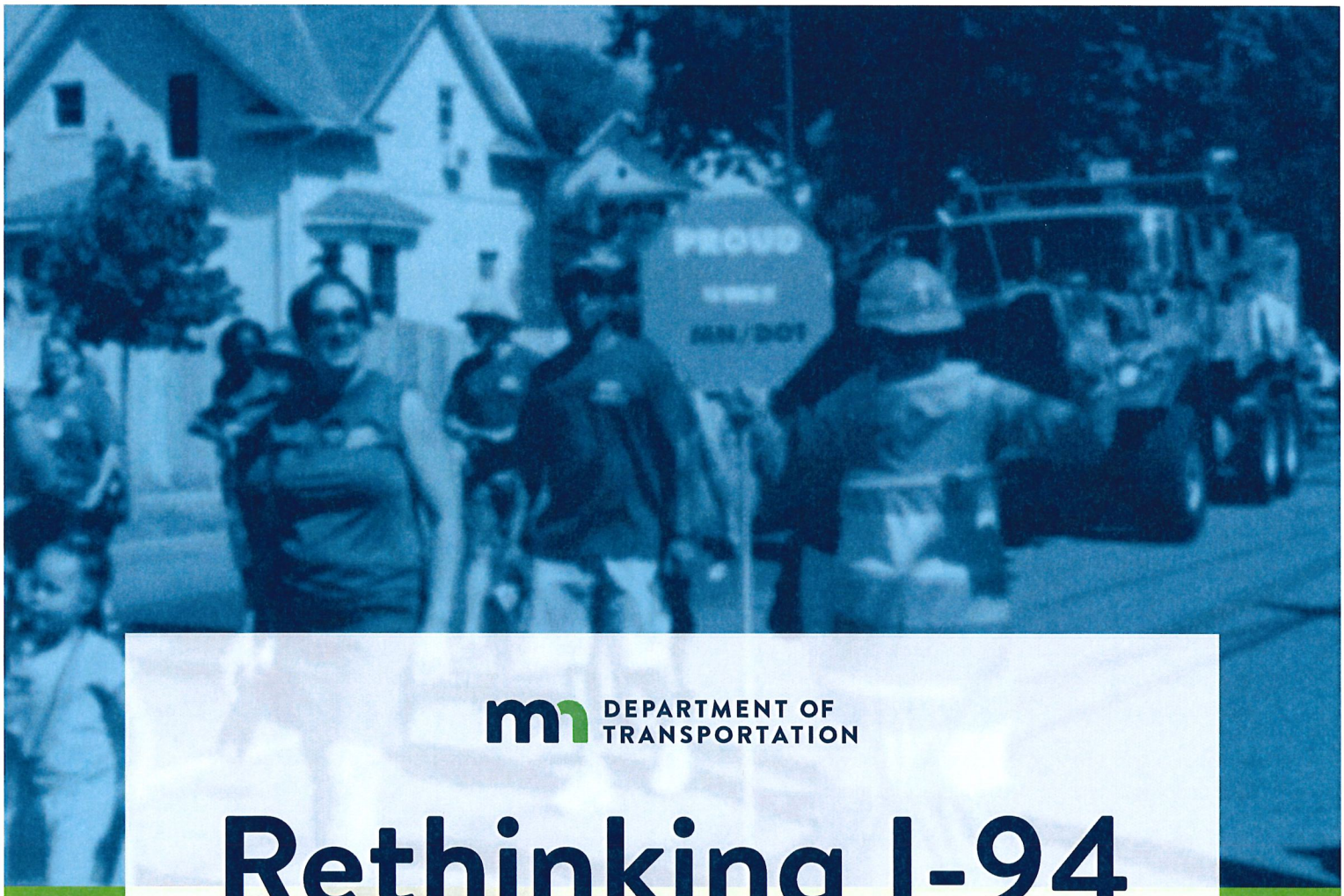
Project Description: Comprehensive study of I-94 issues and needs to guide future development projects and identify construction projects

Project Stage & General Timeline: The 2-year Phase I study has just completed

Public Hearing Date & Location: n/a

Cost & Primary Funding Source(s): MnDOT, US DOT "Every Place Counts Design Challenge" grant; Implementation funding not yet fully identified

Transportation Committee Role:
Information only



DEPARTMENT OF TRANSPORTATION

Rethinking I-94

PHASE 1 EXECUTIVE SUMMARY

08.01.2018

Welcome

In the summer of 2015 during the Rondo Healing Ceremony in St. Paul, I joined with my colleagues former St. Paul Mayor Chris Coleman and Congresswoman Betty McCollum to make a formal public acknowledgement and apology to the Rondo community for the impact of the past policies and practices that disrupted and dismantled the community. This acknowledgement recognized that the decision-making process in the 1960s led to the destruction of a vibrant community.

With the support of many partner agencies, MnDOT subsequently initiated the Rethinking I-94 effort, a new way of understanding and engaging with communities for the long-term benefit of the highway and the communities. The implicit promise of Rethinking I-94 to the Rondo community — and all the communities in the I-94 corridor — was to do better.

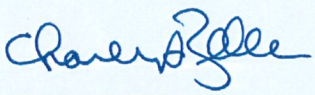
After two and a half years, I am proud of what our Rethinking I-94 team and partner agencies have learned and accomplished. Some highlights include:

- Directly engaged with hundreds of stakeholders in the corridor, developed new relationships and opened new lines of communication
- Learned that our stakeholders want more transparency and partnership from MnDOT, and that their issues with I-94 go beyond just transportation
- Began training our staff in new methods of engagement that they will bring to future projects in the I-94 corridor
- Developed a rich understanding of the state of the I-94 freeway that will inform our development of solutions going forward
- Created a set of guiding principles for working with communities along I-94
- Initiated Rethinking I-94 Phase 2: Environmental Document to develop and evaluate transportation improvement actions for I-94

Despite these achievements, I believe MnDOT and our partners can and should do even more to enhance the transportation and community assets in the I-94 corridor. To that end, I have laid out a draft vision for the I-94 corridor (see next page) that I hope to advance in collaboration with a regional partnership.

In the meantime, I hope you will carefully read this summary of our work to date and watch for our next steps on I-94, including how you can participate.

Sincerely,



Charles A. Zelle
Commissioner, Minnesota Department of Transportation

WHY THIS VISION?

During the first phase of Rethinking I-94, people frequently described I-94 as a "main street." The freeway is a vital connection and a front door for residents and visitors alike to many of the corridor communities. When we asked I-94 community members what their concerns were, here is what we heard most commonly, in no particular order:

- Congestion issues
- Safety issues
- Improved health and environment
- Identity or sense of place
- More job opportunities
- Better connections across the freeway
- More inclusivity in planning

While clearly transportation was a common issue, so were jobs, sense of place, health and environment. It has become clear that Rethinking I-94 is about more than the freeway. As a result, I am challenging our agency – and our partner agencies – to reach beyond our usual roles and try to help.

WHAT IF?

With this experience in mind, here are some questions my staff and I are thinking about for the future:

- What if we developed a regional coalition of public agencies, private businesses, and nonprofit and philanthropic organizations?
- What if that coalition could do things that none of us individually can do?
- What if this transformation could lead to new community and economic activity, and serve as a model for urban living where people of all backgrounds and income levels can thrive?
- What if we could do all this while making sure new investment in the corridor benefits the current residents and minimizes gentrification?

WHY NOW?

I-94 needs new investment and we are actively planning the 20-year future for the corridor. Now is the time to make sure new investment works not just for the highway itself, but for neighbors too. Minneapolis and St. Paul are experiencing continued population growth as more people seek the benefits of urban living. Now is the time to capitalize on this trend for the benefit of I-94 corridor neighborhoods and the region. Finally, unchecked economic growth in our neighborhoods can displace the people it is intended to benefit. Now is the time to apply best practices to harness economic growth that benefits the neighborhoods.

WHAT'S NEXT?

Here is what my staff and I will be doing in the months ahead:

- Soliciting interest from local and regional partners to participate in this new collaboration
- Getting initial input on the vision concepts we have developed so far
- Identifying next steps to finalize the vision and move toward implementation

EXECUTIVE SUMMARY
Rethinking I-94

Construction of Interstate 94 in the 1960s destroyed homes and disconnected neighborhoods, including the Rondo neighborhood in St. Paul. This led to a pattern of community distrust with the Minnesota Highway Department, which would later become the Minnesota Department of Transportation. More than 50 years later in the summer of 2015, MnDOT Commissioner Charles Zelle joined a group of community members and elected officials at a healing ceremony in the heart of the Rondo community. Commissioner Zelle publicly acknowledged past transportation policies and practices that disrupted and dismantled the neighborhood, and formally apologized to the community. This acknowledgment recognized the decision-making process in the 1960s that led to the destruction of a vibrant community. As a result, MnDOT formed Rethinking I-94 as part of a promise to the Rondo community — and all the communities in the I-94 corridor — to do better. This report documents the activities and results from the first phase of Rethinking I-94, which took place between 2016 and mid-2018. It also outlines next steps leading into the second phase of the study.

What is Rethinking I-94?

Rethinking I-94 is a long-term effort to improve MnDOT's engagement and relationships with communities along a 15-mile stretch of I-94 between Broadway Avenue in Minneapolis and Highway 61 in St. Paul. The geographic limits of Rethinking I-94 reflect both portions of the two cities most impacted by the freeway's initial construction and areas where traffic, safety and highway improvements are most needed.

Rethinking I-94 began as a two-year study to develop a new vision for I-94 between Minneapolis and St. Paul. Through public engagement, stakeholders and MnDOT partners would help define and develop a plan for the corridor. MnDOT's responsibility is to preserve and repair bridges, walls, tunnels and pavement along the corridor, with the goals of enhancing mobility, safety and interconnectivity. However, Rethinking I-94 also prioritizes the well-being of those who live, work and play along the corridor.

MnDOT initiated Rethinking I-94 in 2016 in cooperation with partner agencies and the participation of many corridor community groups and individuals. Partner agencies include the Federal Highway Administration, Metropolitan Council, Hennepin County, Ramsey County, city of Minneapolis and city of St. Paul. The agency also worked with other non-profit and government agencies who proposed transportation actions within the I-94 corridor. Examples include Seward Redesign, ReConnectRondo and the Capitol Area Architecture and Planning Board.

Rethinking I-94 has three main purposes:

- Make it easier to travel to, along and across the I-94 corridor and establish a sense of place for the communities that live, work and play there.
- Enhance safety and mobility for people walking, biking, driving and using transit.
- Develop a community-based approach focused on reconnecting neighborhoods, revitalizing communities and ensuring residents have a meaningful voice in transportation decisions that affect their lives.

The Rethinking I-94 study team designed an adaptive process that allows them to adjust and pivot their work based on results and lessons learned along the way. This requires the team to listen, reflect and be willing to make changes based on feedback and results.

The Rethinking I-94 study area extends between West Broadway Avenue in Minneapolis and Highway 61 in St. Paul.

What we learned

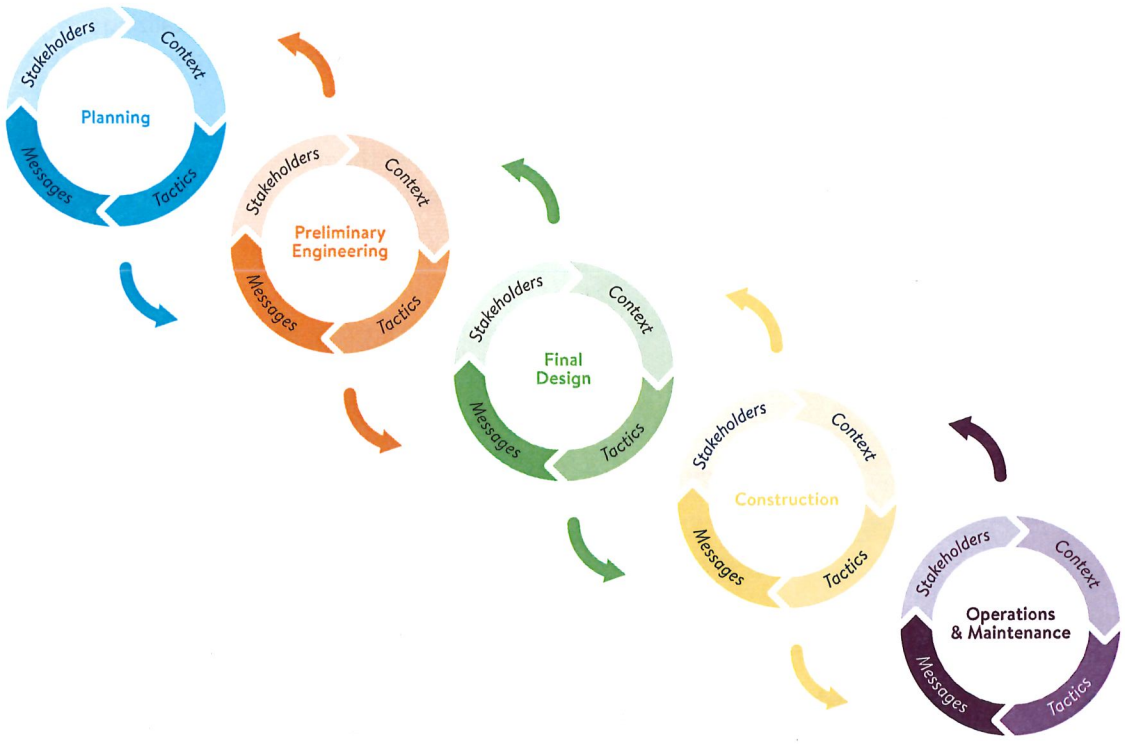
A key outcome of the innovative and comprehensive community engagement conducted during Phase 1 has been a new understanding of what communities in the I-94 corridor want from MnDOT.

People want to be involved early and continuously, and to be respected and provided with accurate, timely information. They want engagement to be inclusive and robust, and their values and visions to be reflected in designs (see figure below).

The extensive engagement efforts conducted during Phase 1 led directly to the development of two sets of guidelines for this corridor. These will guide MnDOT's interactions with communities along this corridor and how they plan and design projects — both are described in detail in the report:

- **Guiding Commitments for project teams:** The guiding commitments were developed based on what people expect from MnDOT. These commitments will guide how MnDOT works with communities in the future.
- **Livability Framework for communities:** The framework is based on what people expect from MnDOT's project work. It will guide how MnDOT will design and evaluate projects in the future.

The environmental process to be conducted during Phase 2 bridges the "Planning" and "Preliminary Engineering" steps in the figure below. This proposed engagement process is a more people-centered, adaptable approach to planning and implementing projects that impact where people live, work and play.



Rethinking I-94's engagement process provides feedback and input opportunities at every step in the process.

Phase 1 accomplishments

Phase 1 of Rethinking I-94 included a wealth of engagement and technical work to develop a baseline understanding of the corridor communities and the highway, both of which will inform subsequent phases of Rethinking I-94.

In Phase 1, MnDOT developed and implemented an innovative, comprehensive and human-centered engagement process to develop a deeper, mutual understanding between the agency and the I-94 communities and users. This included more than 2,200 surveys, 250 meetings and 50 listening sessions preceded by detailed information gathering on the history and demographics of the corridor communities. The results include strengthening of relationships between MnDOT staff and community members, creation of a communications infrastructure to foster ongoing communications and development of a training process for MnDOT staff to continue to apply the Rethinking I-94 engagement process on projects going forward.

Technical work resulted in a rich and detailed understanding of the state of I-94 today and a baseline of information for Phase 2. Details include not just the issues of congestion and safety, but also the magnitude and timing of basic investments to keep the highway functional. Initial ideas for improvements to the freeway corridor include pedestrian and bicycle facilities across and adjacent to I-94, and potential safety and congestion improvements on the freeway itself.

2,200
Completed baseline surveys

1,200+
Online surveys from segment surveys

325+
Comments from online interactive map

75
People participated in listening sessions from more than 50 organizations

6
Visioning workshops

75+
Participants from Smart Growth America

800+
Phone interviews from segment surveys

15
Community events

250+
One-on-one meetings

Community members engage with MnDOT staff during visioning workshop.

MnDOT staff and their families walk in the annual Rondo Days Parade.

I-94 communities: What we understand

NEIGHBORHOODS AND DEMOGRAPHICS

The 15-mile corridor crosses through 14 Minneapolis neighborhood boundaries and nine St. Paul District Council boundaries. The corridor is economically and racially diverse. In addition to the 58 percent of the corridor population that identifies as white, 28 percent identify as African-American, 8 percent as Asian and 6 percent as "Other." There are six primary ethnic communities in the corridor, including American Indians, Euro-Americans, African-Americans, Asian-Americans, Latinos and recent African immigrants, largely from Somalia, Ethiopia and Kenya.

ADVICE FROM LISTENING SESSIONS

The study team conducted more than 50 listening sessions and one-on-one meetings with more than 250 residents, business owners and other stakeholders. The team learned that communities along the corridor value the following top priorities:

- Be transparent about projects, and about how and when community input will be used
- When seeking input, provide communities enough time to develop a community point of view
- Help connect communities to MnDOT but also within themselves and to each other
- Meet community members at locations where they already live, work and gather
- There are hard to reach groups across the corridor, not just in under-resourced areas
- Neighborhood association and district council resources vary
- Clarify the role of MnDOT for any given project or issue
- Be present and listen

COMMON THEMES

Through multiple engagement efforts with community members and stakeholders, the team determined the following responses as common themes for Rethinking I-94. These themes — which are not listed in order of priority — reflect the intent to understand communities more fully, and not just in relation to transportation:

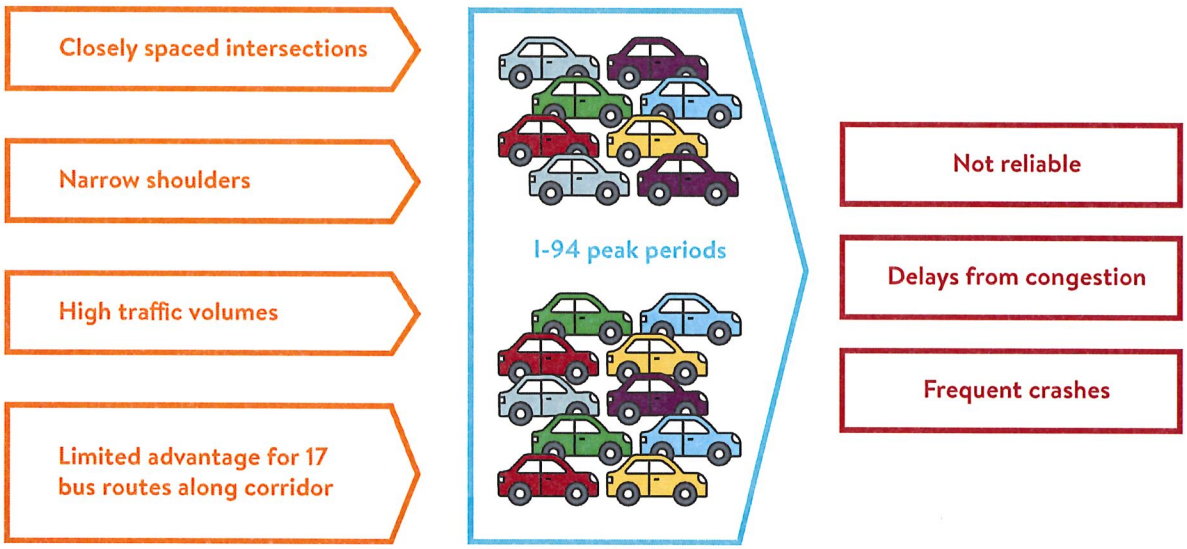
- Congestion issues
- Safety issues — bicycle, pedestrian, motorist
- Improved health and environment — noise, air quality
- No identity or sense of place
- Need for more job opportunities
- Better connections across the freeway
- More inclusivity in planning needed

I-94: What we know about the highway

The Rethinking I-94 study team researched the I-94 freeway to better understand existing infrastructure and transportation conditions.

PHYSICAL CHARACTERISTICS

The physical characteristics of the Rethinking I-94 corridor influence its performance (see figure below). For example, most interchanges are less than one mile apart, which causes congestion. Additionally, there are many on-and off-ramps on the left-hand side of the corridor — some of these may contribute to safety and congestion issues as drivers merge across the highway. While travel lane widths generally meet current design standards for an urban freeway, shoulder widths often do not. Clearance under most bridges is less than the desired 16 to 16.5 feet. The Lowry Hill tunnel near downtown Minneapolis also is a significant bottleneck with no easy solution. I-94 is aging and some components have met the lifecycle for the materials and need to replaced.



High traffic volumes combined with physical constraints cause poor performance on the highway.

TRAFFIC CONDITIONS AND CONGESTION

This segment of I-94 is one of the most heavily used highways in Minnesota, carrying between 150,000 and 170,000 vehicles per day, including about 8,000 freight trips. Congestion on I-94 is generally considerably higher than in the rest of the Twin Cities metro area. Traffic has not grown much in the last 15 years and this may indicate the freeway is at capacity.

Most congestion in the study area recurs each day, with considerable delay seen regularly around the Lowry Tunnel. The average crash rate for the Rethinking I-94 corridor is about twice the metro and statewide averages for freeway facilities, largely due to I-94's heavy congestion. While most crashes are not severe, they cause cause considerable delay to I-94 travelers and should be addressed as part of future freeway improvements.

About half of the trips in the Rethinking I-94 study area originate in the neighborhoods along the corridor. These local trips between I-94 adjacent neighborhoods create congestion as large numbers of drivers merge on and off the highway in a concentrated area. Only a small percentage of trips are "through" trips that begin and end west of downtown Minneapolis and east of downtown St. Paul.

I-94 plays a critical role in connecting area businesses to regional and national markets. Shippers, carriers, receivers and other businesses involved in the freight transportation system rely on the highway, with an estimated 8,000 freight trips per day. Multiple areas of significant freight activity are located near or immediately adjacent to I-94.

There are 67 crossings over or under I-94 that include either a pedestrian or bicycle facility. The condition of these facilities varies widely, as does the spacing of the crossings.

At least 17 bus routes use some portion of the corridor, carrying more than two million passengers per year.

Improving I-94: Potential options

The Rethinking I-94 study team did not develop a comprehensive set of options for improving I-94 during Phase 1; however, the team did develop initial concepts based on identified needs and stakeholder input. The concepts considered are grouped into two categories: pedestrian and bicycle improvements, and freeway improvements.

PEDESTRIAN AND BICYCLE IMPROVEMENTS

During the first phase of Rethinking I-94, community members frequently commented about their desire for improved pedestrian and bicycle connectivity adjacent to and across I-94. These improvements would restore a pedestrian-friendly neighborhood transportation network that existed before the freeway was built.

Although no specific pedestrian and bicycle crossing improvements were identified, the team developed maps that show potential indicators or populations — such as poverty status, low-wage workers and zero car households — that are in greater need of crossing improvements.

Phase 1 identified the goal of improving pedestrian and bicycle facilities parallel to the study area to improve connectivity and use the existing public right-of-way. This information will serve as a starting point for potential improvements that will be discussed during the next phase.

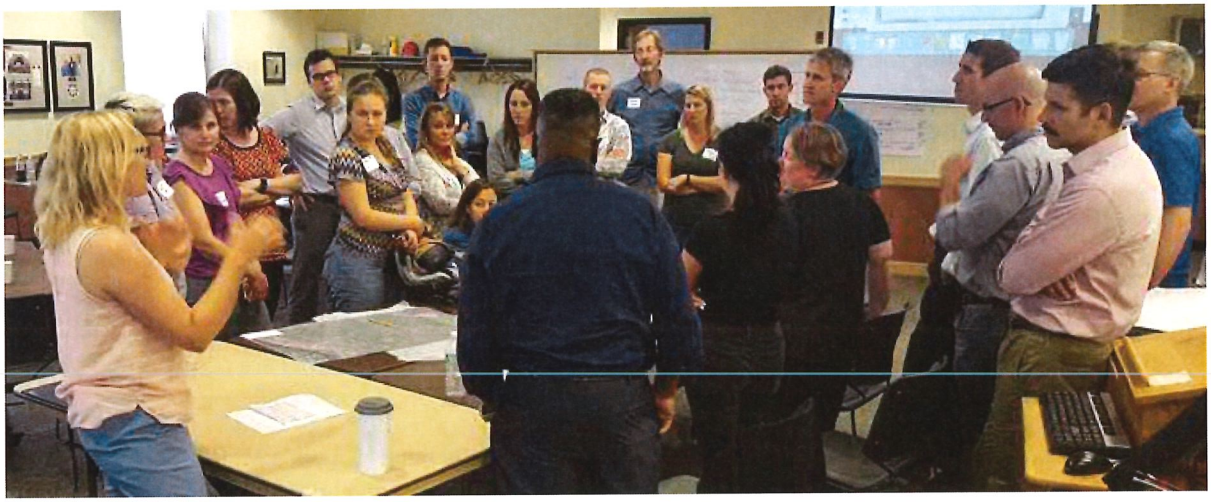
FREEWAY IMPROVEMENTS

Although Phase 1 did not result in a formal evaluation of freeway improvement alternatives, the study team worked to develop concepts for future consideration. The team developed two general types of concepts: spot mobility improvement concepts and managed lane concepts. While these two concept types will be carried forward in Phase 2, others may also be developed.

Spot mobility improvement concepts are potential solutions that can address a mobility and/or safety issue in a specific location. These improvements typically come from a smaller project that delivers benefits at a reasonable cost, such as signing and striping, ramp realignments and interchange improvements. The study team identified potential improvements at 19 locations and analyzed each location for improving safety and reducing congestion. Those with clear benefits are recommended for further analysis in Phase 2, or for possible short-term implementation, if applicable.

Previous studies identified I-94 as a corridor that could potentially benefit from a MnPASS lane — a freeway lane that is restricted during peak travel times to transit, motorcycles, vehicles with two or more occupants or solo drivers who pay a fee. The team did not make any recommendations on the concepts identified in Phase 1.

Rethinking I-94 is planned to continue through multiple phases.



Participants at Smart Growth America workshop.

Lessons Learned

The first phase of Rethinking I-94 has been a learning process, as MnDOT has worked to implement a new way of working with communities. As with any similar large effort, there have been lessons learned along the way. These will be incorporated into the ongoing efforts of Rethinking I-94.

Engagement

Understanding the values and beliefs of communities is extremely important. A significant effort should be put into gaining knowledge about an area's community prior to planning engagement efforts.

Engagement fatigue is real. Partnering with as many agencies as possible that also are working in the community is imperative. This leads to a more collaborative effort; provides opportunities to share knowledge and shows the community that their time is valued.

Providing funding to existing community groups or leaders is well worth the time and effort. These groups already have established the knowledge, trust and respect within their communities. By supporting their efforts, MnDOT can better reach all corridor communities, especially those who are underrepresented.

Technical

Some transportation data ages quickly. With a long, multistep process, continued effort must be applied to make sure data is accurate. MnDOT should consider the best timing for pulling data to minimize rework.

The I-94 corridor is different from other freeway corridors in the Twin Cities due to the very heavy traffic volumes, frequent access points and mix of many different trip patterns.

Planning for the future of a corridor with substantial, underlying investment needs, such as pavement, adds complexity to potential mobility and safety solutions.

Process

Applying a new process like Rethinking I-94 to corridor planning takes more time than "business as usual," as people and processes need time to change and adapt.

The new process still needs to incorporate existing processes — such as the environmental documentation process — which is highly prescriptive.

Next Steps

Rethinking I-94 is envisioned to have three phases. Phase 1, conducted between January 2016 and August 2018, is the first phase of activity conducted under the Rethinking I-94 initiative. This phase, which is the focus of this report, is intended to help gather information about the corridor.

Phase 2 of Rethinking I-94 will center on the preparation of a corridor-level environmental document that complies with both the National Environmental Policy Act and the Minnesota Environmental Policy Act. The purpose of the environmental document is to formally detail the transportation needs in the corridor and then develop and evaluate a range of alternatives to address those needs. This will include ongoing opportunities for corridor stakeholders to be involved.

Work beyond Phase 2 consists of ongoing engagement and project implementation in the corridor as funding allows.

Thank You

Phase 1 of Rethinking I-94 has been a collaborative effort among many people, including MnDOT staff, agency partners, hundreds of community members and outside groups. MnDOT would like to formally thank everyone who participated in Phase 1 for their time and commitment to this effort, and to the future of the I-94 corridor. We look forward to your continued participation in Phase 2 and beyond.

For more information on Rethinking I-94, including how you can get involved, please visit **www.dot.state.mn.us/I-94minneapolis-stpaul**.

Learn more at dot.state.mn.us/I-94minneapolis-stpaul

DEPARTMENT OF TRANSPORTATION

Comment #219

ESC EAW Comments #7

Group Comment – Material Errors, Reliability of Information, and RGU Responsibility

This comment is submitted to address the scope, significance, and regulatory implications of the numerous factual errors, internal inconsistencies, and misleading representations contained in the 61-page "Evaluation of Alternatives" memorandum relied upon by the Responsible Governmental Unit (RGU) in support of the preferred alternative for the East Side Corridor.

The deficiencies identified in the memorandum are not isolated or minor. They occur repeatedly across multiple sections of the document and affect core elements of the environmental review, including but not limited to:

- purpose and need formulation;
- alternatives screening and elimination;
- traffic, travel time, and connectivity analysis;
- residential, noise, utility, and cost impacts;
- growth, annexation, and land use assumptions; and
- interpretation and presentation of historical studies.

As documented in the attached technical analysis, the memorandum contains numerous examples of:

- incorrect distances and measurements;
- inconsistent application of evaluation criteria across alternatives;
- assumptions substituted for verifiable data;
- selective omission of mitigation costs and impacts;
- mischaracterization of historical findings;
- contradictory statements between narrative text, tables, and figures; and
- visual and numerical thresholds selected in a manner that masks adverse impacts.

These errors materially affect the comparative evaluation of alternatives and directly influence which routes were advanced or eliminated. When errors appear repeatedly and consistently favor a single outcome, the resulting analysis cannot be considered reliable or objective for purposes of environmental review.

Under MEPA, the Responsible Governmental Unit bears the legal responsibility to ensure that information relied upon throughout the environmental review process is accurate, complete, and not misleading. This responsibility is non-delegable. While consultants may prepare technical documents, the duty to verify the accuracy and integrity of that information rests with the RGU.

The 61-page memorandum was submitted by the RGU to state and federal agencies despite containing materially inaccurate, incomplete, and misleading information that had been repeatedly identified and countered by residents prior to the document's creation. Residents

provided documented, verifiable data contradicting key assumptions related to corridor history, proximity to homes, noise impacts, traffic volumes, and mitigation requirements. Rather than reconciling or correcting this information, the memorandum selectively relied on assumptions and representations that favored a single outcome. Because this memorandum formed the analytical foundation of the Environmental Assessment Worksheet, these unresolved inaccuracies compromise the integrity of the EAW itself.

Submission of materially inaccurate or internally inconsistent information to state and federal agencies undermines the validity of the environmental record and compromises informed decision-making. An EAW that relies on such information cannot support a Finding of No Significant Impact, as the threshold determination depends on the credibility and completeness of the underlying analysis.

Given the number, type, and significance of the errors identified, the memorandum cannot be cured through clarification or minor revision. The deficiencies demonstrate that the environmental review has not adequately disclosed or evaluated the project's potential impacts or reasonable alternatives.

For these reasons, the RGU must prepare a full Environmental Impact Statement that includes:

- independent verification of technical data;
- consistent application of evaluation criteria across all alternatives;
- full disclosure of costs, impacts, and mitigation requirements; and
- meaningful opportunity for public review and comment on the complete analytical record.

Anything less would perpetuate reliance on a compromised analysis and would fail to satisfy MEPA's requirements for transparency, accuracy, and informed public decision-making.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Challenging Misleading Data: Prioritizing Safety, Accuracy, and Accountability in the East Side Corridor Federal Memorandum

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Chapter 1: History of the East Side Corridor

Introduction

The 61-page "Evaluation of Alternatives" Memorandum was prepared by Mary Gute of WSB on behalf of former Steele County Engineer Greg Ilkka and submitted to Phillip Forst of the Federal Highway Administration (FHWA) and Dale Gade of the Minnesota Department of Transportation (MnDOT) on August 13, 2024. It received formal approval from FHWA on September 3, 2024, and was subsequently circulated to Paul Sponholtz (current Steele County Engineer and project lead), Andrew Plowman (WSB Project Manager), Fausto Cabral (MnDOT District 6 State Aid Engineer), and others.

The document pertains to State Aid Project 074-070-009, which evaluates route alternatives for the proposed East Side Corridor. According to the Memorandum, the East Side Corridor is a joint initiative between Steele County and the City of Owatonna.

Given the Memorandum's use in federal and state environmental review processes, its accuracy and transparency are not only procedural matters—they are legal, financial, and ethical imperatives. Any inconsistencies, omissions, or biased representations in this document can significantly impact affected residents, undermine lawful planning standards, and erode public trust.

Page 1: Responsibility for East Side Corridor Project

The Memorandum confirms that the East Side Corridor is a joint initiative between Steele County and the City of Owatonna.

> This memo is being completed as part of the East Side Corridor Study, led by Steele County in cooperation with the City of Owatonna. The sections that follow discuss the

Page 3: Contradictory Use of Previous Studies

For nearly a year, city and county officials—including commissioners, engineers, council members, and administrators—have consistently stated that this is a "new project with a new purpose", thereby invalidating previous studies. This position has been publicly reiterated by City Administrator Kris Busse during City Council meetings and is documented in the public record.

However, this Memorandum now incorporates and compares data from those very past studies. This shift in narrative—treating older reports as both invalid and valid depending on the context—creates confusion and undermines transparency in the decision-making process.

> Previous planning efforts on the east side of Owatonna were initially reviewed to help define the study area and to develop East Side Corridor alternatives. Previously completed plans, studies, environmental documents, and mapping documents related to potential north-south transportation routes on the east side of Owatonna that have been completed since the 1990s are documented in the Owatonna East Side Corridor Location Memo, completed in August 2022 (see **Attachment A**). A common theme of the previous studies was similar to this project's purpose, which is to improve the connectivity of Steele County's transportation network and to meet near term and future travel needs on the east side of the City of Owatonna and adjacent townships.

Page 3: 24th Ave: Misrepresented History and Right-of-Way Confusion

The Memorandum references the 1999 study of 24th Avenue, which was rejected at that time for being too close to residential neighborhoods. That report recommended shifting the alignment 800 feet east to minimize noise and environmental impact (1999 Environmental Assessment Worksheet, p. 11).

Importantly:

- 24th Avenue was never designated as an officially mapped right-of-way.
- In 2000, a 150-foot-wide right-of-way—located 1,200 feet east of Greenhaven—was officially mapped and filed as what became known as 29th Avenue (Doc: A280471).
- The 2004 US 14 Beltline Study recommended preserving 34th Avenue (Alternative 5) and 44th Avenue for future corridors, noting 34th Avenue should serve as an *internal collector* with an overpass south of Highway 14.
- That same study recommended against using the mapped right-of-way as a beltline, suggesting it should only function as a shorter city street at most. (Page 30)

Subsequent planning and development reflected this shift:

- **2004 to Present** Homes and utilities were built on the officially mapped 29th Avenue right-of-way. 150' no longer exists.
- **2005-2025 Steele County Transportation Plan** identified (Page 11 & 15):
  - 29th Avenue as a short city street connector (Dane Road to Rose Street)
  - 34th Avenue (Alternative 5 today) as the preferred inner corridor
  - 44th Avenue as the external beltline
- **2006 Owatonna Development Plan** also designated 29th Avenue as a shorter city street, not an inner collector and 34th Avenue (Alternative 5 today) as an inner corridor. (Page 24, 37, 49)
- **2009:** Both 34th Avenue (Alternative 5 today) and 44th Avenue were officially mapped as 150-foot-wide right-of-way, aligning with the US 14 Beltline Study 2004.

Contrary to the Memorandum's claims, 24th Avenue was neither an officially mapped corridor nor comparable to current Alternative 3. Its designation as "Alternative A" in the 1990s placed it along what were then the outer edges of the city—similar in location to today's Alternative 1. These distinctions matter because omitting them distorts both the historical planning context and public understanding.

Many of these previous planning efforts focused on identifying a beltline route that would connect to US 14. In 1999 the Steele County Board selected a section of a beltline corridor route called 24th Ave, which would have largely been on new alignment. This route is similar to Alternative 3 in **Figure 1**. When MnDOT was planning to convert US 14 into a freeway and included an interchange at US 218/Bixby Road, it was then determined that the 24th Ave route could no longer connect to US 14 due to freeway interchange spacing requirements.

Studies in 2004 and 2011 concluded with the Steele County Board selecting CSAH 43 (44th Ave NE) as the east beltline and MnDOT committing to a future US 14 interchange at CSAH 43. With the potential beltline corridor moved farther east of Owatonna's city limits, the 2004 study identified that two additional north-south, inner collector roadways, closer to downtown Owatonna than CSAH 43, would be needed to meet area transportation needs. These inner collectors were recognized as necessary because the CSAH 43 alignment beltline would not contribute to reducing the downtown area traffic congestion due to distance.

The 2004 study documented that the 24th Ave route had been Officially Mapped by the County Board and that the City of Owatonna would assume responsibility for constructing the road as development warranted.[1] The 24th Ave route was planned to meet the existing transportation needs to reduce downtown traffic congestion and to accommodate existing development. The 2004 plan also recommended that the 34th Ave corridor (similar to Alternative 5, shown in **Figure 1**) be preserved for another long-term future internal collector roadway to accommodate additional long term city growth.[2] Based on that recommendation, the Steele County Board Officially Mapped the 34th Ave route.

These two, north-south corridors – 24th Ave and 34th Ave – are both included in the 2006 City Comprehensive Plan and Steele County's 2040 Transportation Plan. The locations of these identified future routes align with FHWA spacing guidelines and would serve future development without contributing additional congestion to the downtown area.

Page 4: Deviations to Mapped Right of Way

The Memorandum notes route deviations intended to avoid future development areas—specifically, vacant lots in a new subdivision north of town. However, similar efforts were not made to avoid established neighborhoods like North Country.

Despite repeated resident inquiries, the county has not provided data or justification for why some areas were spared while others were not. This inconsistency raises concerns about fairness in how impacts were distributed and decisions prioritized.

Alternative 3
New alignment approximately 2.2 miles east of CSAH 1/Cedar Ave/CSAH 45, with deviations north of CSAH 19 (Rose St) and south of CR 180. This alternative is generally consistent with the location of a Steele County officially mapped corridor.

Page 6: Contradictions in Pedestrian and Bicycle Comfort Measures

The Memorandum states that pedestrian and bicycle comfort measures were identical across all alternatives and therefore not used as criteria in selecting a preferred corridor.

However, later portions of the document inconsistently highlight bicycle accessibility as a differentiator—particularly in favor of some alternatives over others. This contradiction contributes to confusion and may mislead readers into thinking bikeability varied by route when it did not.

distances between origins and destinations by walking were all over 1 mile. Therefore, all of the alternatives were found to rate low for this measure. Additionally, the results for the criteria used to measure pedestrian and bicycle comfort all yielded high ratings for all alternatives, meaning that there was not a difference among the alternatives for this measure. Because all alternatives rated the same for these two measures and provided no differentiation, these measures were not included in discussion below or used to make a corridor recommendation. The evaluation process was structured so that if an alternative did not meet the majority of Step 1 criteria, it was eliminated from further evaluation in Step 2. The results of the project needs evaluation are shown in **Table 1** and described below.

Page 7: Inconsistent and Misleading Data Comparisons

Several discrepancies appear in the comparison tables, particularly around **connectivity, access, and location within city boundaries**:

- **Connectivity:** Page 34 addresses connectivity but contains significant discrepancies, including inaccurate distances and incorrect highlighting.
- **Access to existing subdivisions:** Noted yes for Alternatives 1–3. Alternatives 2 and 3 are shown to connect with existing neighborhoods, yet both would require continuous noise walls that effectively block access to the North Country Subdivision—functionally rendering them similar to Alternative 4, which is highlighted differently.
- **City Boundary Markings:** Alternatives 1b and 1c are listed as "within city boundaries: Yes," while Alternatives 2 and 3 are marked as "partially." In fact, **none** of the alternatives lie entirely within city limits. These inconsistencies may affect how the public and agencies perceive regulatory oversight and annexation implications.
- **Future Growth Boundaries**: The Memorandum states that Alternative 4 is on the "edge" of the future growth boundary. However, maps on pages 29 and 59 clearly show that the growth area extends to 34th Avenue (Alternative 5), placing Alternative 4 squarely within it—just like Alternative 3. The distinction presented is misleading.
- **Bicycle Accessibility:** While earlier pages stated this factor was not considered in route selection, the table on page 34 flags Alternative 4 negatively in red for bicycle accessibility—despite all routes having equal provisions. This selective emphasis distorts the comparison.

Table 1: Purpose & Need Performance Measures

Category	Evaluation Criteria	Performance Measures	1A: New alignment approx. 2 mi east of CSAH 1/Cedar Ave/CSAH 45	1B: Modification of Alt 1 to include Kenyon Rd and Dane Rd N or Dane Rd	1C: Modification of Alt 1 to include route along E Rose St, Partridge Ave, and new alignment S of Rose St.	2: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45	3: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45, with deviations N of Rose St and S of CR 180	4: New alignment approx. 2.5 mi E of CSAH 1/Cedar Ave/CSAH 45	5: 34th Ave E, approx. 3 mi E of CSAH 1/Cedar Ave/CSAH 45
Vehicle Mobility	Connectivity	Travel time between origins and destinations. Trip length/distance.* **(Attachment C)**	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 4/5 trips; longer for 1 trip. Shorter or same distance for 4/5 trips; longer for 1 trip.	Shorter travel time for 1 trip; same or similar time for 3/5 trips; longer for 1 trip. Shorter distance for 1 trip; same or similar distance for 3/5 trips; longer distance for 1 trip.	Shorter travel time for 1 trip; same or similar time for 3/5 trips; longer travel time for 1 trip. Shorter distance for 1 trip; same or similar distance for 3/5 trips; longer distances for 1 trip.	Same or similar travel time for 3/5 of trips; longer travel time for 2 trips. Shorter distance for 1 trip; longer distance for 4/5 of trips.	Longer distances and slower travel times for all 5 trips analyzed
	Downtown Congestion Impacts	Volume/Capacity ratios and typical planning-level capacity thresholds on downtown roadways **(Attachment D)**	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.78 Mineral Springs Rd (2): 0.86 Cedar Ave N: 0.87	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.85 Mineral Springs Rd (2): 0.93 Cedar Ave N: 0.92	Mineral Springs Rd (1): 0.93 Mineral Springs Rd (2): 1.01 Cedar Ave N: 0.92
	Land Use and Anticipated Growth Areas **(Attachment E)**	• Potential to support **current** land uses • Within and around the official city limits/boundary	Access to existing developments: yes Within city boundary: partially	Access to existing developments: yes Within city boundary: yes	Access to existing developments: yes Within city boundary: yes	Access to existing developments: yes Within city boundary: partially	Access to existing developments: yes Within city boundary: partially	Access to existing developments: no Within city boundary: no	Access to existing developments: no Within city boundary: no
		• Potential to support **future** land uses • Within and around the growth area boundary	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: yes	Access to future land uses: yes Within future growth boundary: edge	Access to future land uses: yes Within future growth boundary: no
Walkability and Bikeability **(Attachment F)**	Connections to Existing and Planned City Trails	Number of connections to **existing** city trails	**Existing:** Rose St E (to the west) (1)	**Existing:** 26th St NE (west), Mineral Springs Rd NE, Rose St E (west) (3)	**Existing:** Rose St (1)	**Existing:** none (0)	**Existing:** none (0)	**Existing:** none (0)	**Existing:** none (0)
		Number of connections to **planned** city trails	**Planned:** 26th St NE, Buxton Trail extension, Dane Rd, Rose St (to the east), 18th St SE (5)	**Planned:** 26th St NE (east), Dane Rd, Buxton Trail extension, Rose St (east), 18th St SE (5)	**Planned:** 26th St NE, Bruxton Trail extension, Dane Rd, Rose St, Havana Rd SE, 18th St SE (6)	**Planned:** 26th St NE, Dane Rd, Rose St, 18th St SE (4)	**Planned:** 26th St NE, Dane Rd, Rose St, 18th St SE (4)	**Planned:** 26th St NE, Dane Rd (2)	**Planned:** 26th St NE (1)
	Distances between Key Origins and Destinations as Compared to Distances People Are Willing to Walk and Bike	Alternative results in distances between origins and destinations** that people are willing to travel: **1 mile for walking**	No	No	No	No	No	No	No
		Alternative results in distances between origins and destinations** that people are willing to travel: **3 miles for biking**	Yes	Yes	Yes	Yes	Yes	No	No
	Pedestrian and Bicycle Comfort	• **P**edestrian Multimodal Level of Service (Oregon method) for segments • **B**icycle Multimodal Level of Service (Oregon method) for segments***	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C	Pedestrian LOS B Bicycle LOS C

Legend		
Low: Similar or longer travel times for all 5 trips analyzed.	**Medium:** Shorter travel time for at least one but less than 3 of the 5 trips analyzed	**High:** Shorter travel time for at least three of the 5 trips analyzed.
Low: At least one V/C ratio greater than 1.0	**Medium:** All V/C ratios less than 1.0. At least one V/C ratio greater than 0.80.	**High:** All V/C ratios less than 0.80
Low: does not provide direct access to existing developments AND not within city boundary	**Medium:** provides direct access to existing development(s) AND partially within city boundary	**High:** provides direct access to existing developments AND within city boundary
Low: does not provide access to future land uses OR is not within future growth boundary	**Medium:** provides access to future land uses AND is on edge of future growth boundary	**High:** provides access to future land uses AND is within future growth boundary
Low: 0 connections to existing city trails	**Medium:** 1-4 connections to existing city trails	**High:** 5+ connections to existing city trails
Low: 0 connections to planned city trails	**Medium:** 1-4 connections to planned city trails	**High:** 5+ connections to planned city trails
Low: Distance between origins and destinations is >1 mile	**Medium:** NA	**High:** Distance between origins and destinations is <1 mile
Low: Distance between the majority of origins and destinations is >3 mile	**Medium:** NA	**High:** Distance between the majority of origins and destinations is <3 mile
Low: Any MMLOS F	**Medium:** MMLOS D and/or E	**High:** All MMLOSs range from A-C

* Similar travel time refers to same travel time as existing to the nearest minute when rounded. Similar distance means within 0.5 miles of existing distance.
Some trips with longer distances have shorter travel times, primarily because these trips go through less-developed areas, allow for higher travel speeds, and result in less conflicting traffic compared to other routes.
** Origins (residential locations located within close proximity of the study area) and destinations (Owatonna High School, Owatonna Soccer Complex, Lincoln Elementary School, Hammann Park, Daikin Soccer Complex, Nass Woods Park, and Mineral Springs Park)
*** MMLOS was calculated for each alternative as one segment, assuming that corridor characteristics would be relatively similar. Inputs required for intersection MMLOSs are not available at this level of study.
Pedestrian LOS assumptions: one lane in each direction, sidewalk width of at least 5ft, speed limit at least 40 mph, and less than 500 vehicles/hr. Bicycle LOS assumptions: one lane in each direction, bicycle lane or shoulder at least 4ft, speed limit is not 30 mph or less, and there are unsignalized conflict points. Both were done for intersections only.

Summary of Pages 4–7

When corrected for accuracy and consistency, Alternative 4 closely resembles Alternative 3 in terms of location, access, and connectivity—but offers distinct advantages in terms of avoiding residential impacts. The inconsistencies in how these criteria are applied and visually highlighted suggest a potential bias in how data was presented to favor certain outcomes.

Page 8: Biased Assessment Criteria in Route Comparison

The Memorandum's comparison of travel times and distances presents several inconsistencies, particularly in how routes are visually and numerically rated.

Route Comparison

According to WSB's data on page 34 of the Memorandum, three out of five routes have similar travel times but slightly longer distances than existing trips. These were highlighted in yellow for Alternative 3. However, Alternative 4—despite showing comparable data—is flagged in red, suggesting a disadvantage that does not appear to be supported by the numbers.

When accurate measurements are applied, the relative efficiency of Alternative 4 improves further, undermining the color-coded implication that it is a less viable option.

Proximity to Homes: Alternative 3

WSB acknowledged on October 3, 2024, that Alternative 3 curves west and comes within 17 feet of existing homes. This realignment was made to partially align the route within city limits over a stretch of approximately seven blocks (one subdivision).

This proximity to homes raises several concerns:

- It would immediately trigger the need for **noise mitigation** per regulatory standards.
- It introduces **significant safety risks** for nearby families.
- These factors are **not fully addressed or acknowledged** in the Memorandum.

Growth and Annexation Areas

All route alternatives lie within the designated **growth area**. However:

- None are fully within the planned annexation area.
- Alternative 4, like Alternative 3, is centrally located in the middle of the future growth area, as shown on maps on pages 29 and 59.
- Unlike Alternative 3, Alternative 4 does not approach existing homes, preserving a buffer and avoiding the need to reduce the right-of-way.

These distinctions are material and contradict how the routes were rated in the report.

Route Ratings

Despite similar travel times and volume-to-capacity (V/C) outcomes, Alternative 3 is rated high, while Alternative 4 is rated low. This discrepancy is unexplained and may reflect selective emphasis rather than an objective scoring system.

Bikeability Considerations

The Memorandum initially stated that bikeability was **not a factor** in determining the preferred route (page 6). However, here, bikeability is **used to negatively differentiate** Alternative 4. This contradiction reinforces concerns about inconsistent evaluation criteria.

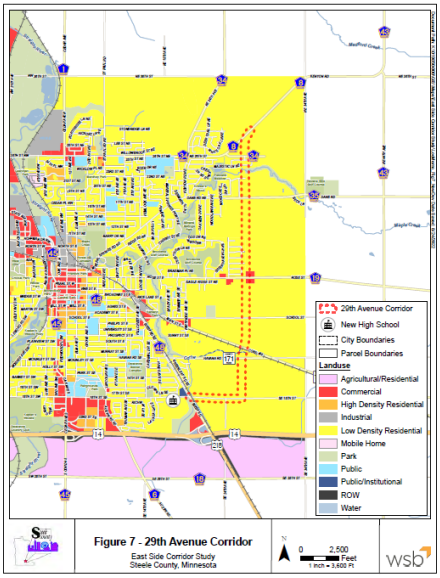
Alternative 3
This alternative rated either high or medium for all vehicle mobility measures. Relative to walkability and bikeability measures for which there are differences amongst alternatives, the alternative rated low for connections to existing trails. The majority of trips between origins and destinations would have shorter or similar travel times and distances when compared to existing trips. Alternative 3 would result in acceptable and improved volume/capacity (V/C) ratios on downtown roadways. This alternative is partially within existing city boundaries, and it is fully within the City of Owatonna's growth area boundary. While Alternative 3 only touches one current land use, it would connect several future land uses. This alternative does not connect to any existing city trails. It would connect to four planned trails, and would result in biking distances between origins and destinations of under three miles.

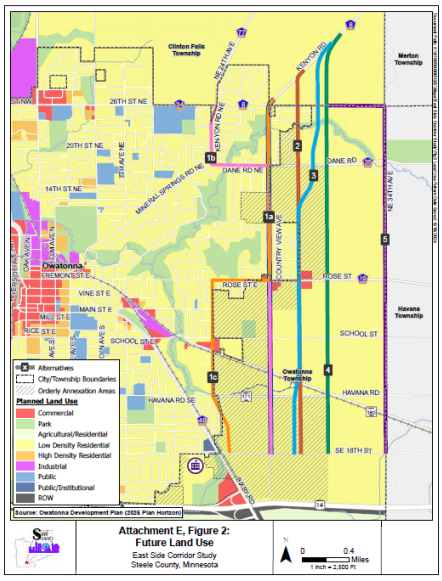
Alternative 4
This alternative rated low in multiple vehicle mobility measures, including trip length, distance, and travel time between origins and destinations; and the potential to support current and future land uses in proximity to the city's official boundary. The majority of trips between origins and destinations would have similar travel times but longer distances compared to existing trips. Alternative 4 would result in acceptable volume/capacity (V/C) ratios on downtown roadways. This alternative would not connect any developed land uses, is not within the existing city boundary, and is on the edge of the growth area boundary. Alternative 4 does not connect to any existing city trails but would connect to two planned trails. It would not result in biking distances between origins and destinations under three miles.

Conclusion for Page 8

When the data is accurately and consistently presented, Alternative 4 performs comparably—or in several cases better—than Alternative 3, particularly when residential impacts and long-term growth considerations are factored in. Yet, it was rated significantly lower without clear justification.

Page 29 and 59 Growth Maps:





Page 9: Alternative 4: Unjustified Exclusion and Evaluation Bias

Alternative 4, despite being statistically similar to Alternative 3, is rated significantly lower in the Memorandum. This raises concerns about inconsistencies in the evaluation process and the rationale used to eliminate it from further consideration.

Connectivity

According to page 61 of the Memorandum, Alternative 3 includes a planned $2.3 million noise wall, which would run along its only neighborhood connection. However, that same noise wall would physically obstruct access to the subdivision it claims to serve—North Country—rendering its connectivity similar to Alternative 4.

When access restrictions are factored in, the connectivity benefit assigned to Alternative 3 becomes questionable, and its rating appears overstated.

Land Use and Anticipated Growth Areas

Pages 29 and 59 of the Memorandum show that Alternative 4 lies within the center of the planned growth area, just like Alternative 3. Its location supports future development and aligns with city expansion goals.

Despite this, Alternative 4 is described as less favorable, without data to support how its placement within the growth boundary is meaningfully different from Alternative 3.

Bikeability

Page 6 of the Memorandum notes that bikeability was not used to determine preferred alternatives. Yet later sections selectively highlight this feature to down score Alternative 4. This contradiction undermines the objectivity of the evaluation process.

Volume-to-Capacity (V/C)

The Memorandum identifies meeting V/C goals as a key purpose-and-need criterion (criterion #2). Both Alternatives 3 and 4 meet this standard, yet only Alternative 3 receives favorable marks for doing so. This omission in the scoring for Alternative 4 distorts its overall performance in the matrix.

Cost Considerations

Alternative 4 avoids the need for both a $2.3 million noise wall and the $7.8 million urban road redesign required by Alternative 3. These savings represent a substantial cost difference. If Alternative 4 had been fairly evaluated, it would likely have been shown to be more cost-effective and less impactful to existing residents.

> In addition to the low ratings described above, both Alternatives 4 and 5 received low ratings for these vehicle mobility measures: 1) connectivity, and 2) land use and anticipated growth areas; and 3) distances between origins and destinations for bicycles. Alternative 5 also received low ratings for downtown congestion impacts and potential to support future land uses within and around the City of Owatonna's growth area boundary. For these reasons, Alternatives 4 and 5 were not carried forward for further analysis.

Summary of Findings

Alternative 4:

- Meets the same core criteria as Alternative 3
- Avoids proximity to residential homes
- Does not require a noise wall or costly urban design modifications
- Supports city growth within the mapped boundary
- Would likely be significantly less expensive

The exclusion of Alternative 4 from further study, despite its clear viability, raises questions about the integrity and transparency of the evaluation process.

Page 11: SEE Evaluation: Inconsistent Impact Ratings and Miscalculations

Table 2: SEE Impacts and Additional Considerations Performance Measures

	Category	Evaluation Criteria	Performance Measures	1A: New alignment approx. 2 mi east of CSAH 1/Cedar Ave/CSAH 45	1B: Modification of Alt 1 to include Kenyon Rd and Dane Rd N or Dane Rd	1C: Modification of Alt 1 to include route along E Rose St, Partridge Ave, and new alignment S of Rose St.	2: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45	3: New alignment approx. 2.2 mi E of CSAH 1/Cedar Ave/CSAH 45, with deviations N of Rose St and S of CR 100
SEE Impacts	Wetlands	Potential impacts to resource	Acreage of wetland resources impacted (See **Attachment G**)	1.11	1.01	1.99	1.16	1.39
	Right of Way	Property impacts	Number of parcels affected	Parcels Affected - 98	Parcels Affected - 100	Parcels Affected - 126	Parcels Affected - 63	Parcels Affected - 60
			Permanent acres of property impacts	Perm - 43.25 Acres	Perm - 40.78 Acres	Perm - 32.1 Acres	Perm - 47.55 Acres	Perm - 56.08 Acres
			Number of residential and business relocations	35 residences 1 business	37 residences 1 business	49 residences 1 business	10 residences 0 businesses	0 residences or businesses
	Farmland	Potential impacts to farm resources (**Attachment H**)	Acreage impacts to all farmland	26.62	25.64	17.42	45.6	54.88
			Acreage impacts to prime farmland, prime farmland if drained, and farmland of statewide importance	Prime Farmland - 6.94 Acres Prime Farmland if Drained - 2.19 Acres Farmland of Statewide Importance - 0.56 Acres **TOTAL Impacts: 9.69 Acres**	Prime Farmland - 7.64 Acres Prime Farmland if Drained - 2.22 Acres Farmland of Statewide Importance - 0.13 Acres **TOTAL Impacts: 9.99 Acres**	Prime Farmland - 7.85 Acres Prime Farmland if Drained - 2.71 Acres Farmland of Statewide Importance - 0.53 Acres **TOTAL Impacts: 11.09 Acres**	Prime Farmland - 16.96 Acres Prime Farmland if Drained - 3.62 Acres Farmland of Statewide Importance - 1.60 Acres **TOTAL Impacts: 22.18 Acres**	Prime Farmland - 22.13 Acres Prime Farmland if Drained - 9.79 Acres Farmland of Statewide Importance - 1.25 Acres **TOTAL Impacts: 33.17 Acres**
			Number of farmland parcels potentially bisected	0	0	0	1	4
	Noise	Potential impact to noise receptors	Number and type of noise receptors potentially impacted*	Residential - 83 Parks - 1 Businesses - 2 **TOTAL: 86 Noise Receptors**	Residential - 135 Parks - 1 Businesses - 2 **TOTAL: 138 Noise Receptors**	Residential - 158 Parks - 1 Businesses - 3 **TOTAL: 162 Noise Receptors**	Residential - 30 **TOTAL: 30 Noise Receptors**	Residential - 27 **TOTAL: 27 Noise Receptors**
	Contaminated Properties	Impact to site with potential for hazardous materials	Number of impacted contaminated sites (in Minnesota Pollution Control Agency's What's In My Neighborhood database) (**See Attachment I**)	1	1	1	1	2
	Utilities	Potential to impact mapped facilities	Qualitative Assessment: Potential impact to mapped utilities	Medium Impact	Medium Impact	Medium Impact	Low Impact	Low Impact
	Floodplain	Potential impact to resource	Number of resources impacted (resource impacted and encroachment type for informational purposes only). (**See Attachment G**)	1: Maple Creek (Transverse)	1: Maple Creek (Transverse)	2: Maple Creek (Transverse) & Izaak Walton Creek (Transverse/Longitudinal)	1: Maple Creek (Transverse)	1: Maple Creek (Transverse)
			If applicable, number of feet of encroachment into floodplain	811	78 (An existing crossing on Dane Rd NE is in place at this location)	Maple Creek: 811 Izaak Walton (Transverse): 615 Izaak Walton (Longitudinal): 295	769	636
	Protected Species	Potential impact to federal threatened and endangered species	Species listed for the alternative corridor area based on the Information for Planning and Consultation (IPaC) tool	An IPaC report pulled for the East Side Corridor Study area showed numerous Federally endangered, proposed endangered, or candidate species (including mammals, birds, insects, and flowering plants). No critical habitats were identified within the study area. Bald eagles were identified as likely present within the project area. Numerous other bids were identified as warranting special attention in the project area. The IPaC tool is not detailed enough to specify meaningful differences amongst the alternatives under consideration. A more detailed Federal species review will be completed as part of the environmental review process completed for the preferred alternative.				
		Potential impact to areas of Biodiversity Significance	Areas of Biodiversity Significance potentially impacted (acres) (**See Attachment J**)	1.5	1.75	1.5	0.1	0.1
		Potential impact to DNR Native Plant Communities	Areas of DNR Native Plant Communities potentially impacted (acres) (**See Attachment J**)	1.5	1.75	1.5	0.1	0.1
Additional Considerations	Consistency with Local and Long-Term Plans	Consistency with local and long-term plans	Is the alternative consistent with the corridor vision articulated in local planning and development documents?**	Medium	Medium	Medium	High	High
	Estimated Project Costs	High-level estimate to construct alternative	Estimated project costs*** (**See Attachment K**)	$41.1M	$46.5M	$49.3M	$34.2M	$29.8M

Legend		
Low: >2 acres of impacts	Medium: 1-1.99 acres of impacts	High: < 1.0 acres of impacts
Low: 66+ parcels affected	Medium: 34-65 parcels affected	High:0-33 parcels affected
Low: 66+ acres of impacts	Medium: 34-65 acres of impacts	High: 0-33 acres of impacts
Low: Any residential or business relocations.	Medium: NA	High: 0 residential and business relocations.
Low: 66+ acres of impacts	Medium: 34-65 acres of impacts	High: 0-33 acres of impacts
Low: >40 acres of impacts to prime farmland and farmland of statewide importance	Medium: 20-40 acres of impacts to prime farmland and farmland of statewide importance	High: <20 acres of impacts to prime farmland and farmland of statewide importance
Low: >4 farmland parcels bisected	Medium: 1 -4 farmland parcels bisected	High: 0 farmland parcels bisected
Low: 100+ Noise Receptors	Medium: 51-100 Noise Receptors	High: 0-50 Noise Receptors
Low: >4 contaminated sites	Medium: 1-4 contaminated sites	High: 0 contaminated sites
Low: Relatively high level of development correlates to many in place utilities.	Medium: Relatively moderate level of development correlates to some in place utilities.	High: Relatively low level of development correlates to few in place utilities.
Low: 2 types of encroachment (transverse and longitudinal)	Medium: One type of encroachment (transverse or longitudinal)	High: No encroachment
Low: 800'+ of impacts	Medium: 700'-799' of impacts	High: < 699' of impacts
Low: NA	Medium: NA	High: NA
Low: 1.0+ acres of impacts	Medium: 0.5 - 0.99 acres of impacts	High: 0.0 - 0.49 acres of impacts
Low: 1.0+ acres of impacts	Medium: 0.5 - 0.99 acres of impacts	High: 0.0 - 0.49 acres of impacts
Low: Not consistent with corridor vision articulated in all approved, local planning and development documents**	Medium: Partially consistent with corridor vision articulated in all approved, local planning and development documents**	High: Consistent with corridor vision articulated in approved, local planning and development documents**
Low: Cost >$40M	Medium: Cost $30< + $39M	High: Cost <$30M

* Note: Included receptors within 250' of either side of alternative corridor. These numbers are for comparison only, and are not based on detailed noise analyses.
** Specifically the Steele County 2040 Transportation Plan; City of Owatonna 2040 Transportation Plan; and Owatonna 2006 Development Plan.
*** Note: Costs are based on a high level of conceptual design that is consistent with this stage of project development. Project costs will continue to change as additional project details become available, and based on current pricing conditions. Construction costs are subject to market related fluxuations that cannot be predicted

Residential and Business Impacts

The Memorandum lists 10 residential relocations for Alternative 2. However, this route runs adjacent to Hill Drive—a layout that appears no more disruptive than Alternatives 2 and 3 along North Country. The relocation counts for Alternative 2 may therefore be overstated.

For Alternative 3**,** the Memorandum claims no residential impacts. However, early layouts included the Larry Schultz homestead. If adjustments could be made to spare a single home, it raises the question: why couldn't similar efforts be applied to preserve entire neighborhoods?

Additionally, the North Country Subdivision owns the westernmost 50 feet of the mapped 150-foot right-of-way. This directly affects at least 18 residential properties—a fact not reflected in the document's relocation estimates. In reality, these homes would require relocation under standard design widths.

The attempt to reduce the corridor to a 100-foot footprint to avoid eminent domain introduces its own problems: reduced safety margins, proximity to homes, and long-term usability concerns. Fair comparisons using the full 150-foot corridor standard would have revealed significantly more residential relocation impacts for Alternatives 2 and 3.

Farmland Disruption

Alternative 4 follows some existing parcel lines**,** which reduces bisecting farmland and lowers disruption to agricultural operations. Other alternatives, with the exception of alternative 5, are less efficient in this regard and create more fragmented farmland.

Noise Receptors

The Memorandum lists 27 noise receptors for Alternative 3. However, this figure appears based on a 250-foot buffer. Within North Country alone, there are at least 35 receptors at 250 feet—and 39 when using MnDOT's standard 300-foot measurement (per Figure R1).

Nearby farmsteads would increase this number even further. Alternative 2, which follows a nearly identical path to Alternative 3, likely shares these impacts—but the numbers do not reflect that.

Figure R1 – North Country Subdivision Noise Receptors

Utility Impacts

Alternative 3 is listed as having low utility impact, which is inconsistent with on-the-ground realities. In North Country:

- Overhead utility lines lie 50 feet east of the west edge of the mapped right-of-way
- AT&T fiber optic lines run along the east side

Relocating these utilities would be both complex and expensive, with costs for the fiber lines alone potentially in the hundreds of thousands, according to county officials. These Costs are not included in the cost analysis on page 61.

Project Cost Discrepancies

- **Alternative 2** is rated as "low cost" at $34.2 million, though the Memorandum defines projects between $30–39 million as medium cost. This classification inconsistency reflects a pattern of imprecise data usage.
- **Alternative 3** has seen its costs more than double since project inception. It is listed in the STIP as an $8 million project. The cost of mitigation measures continues to rise without reassessment.

Notably, Alternative 4 would avoid both the $2.3 million noise wall and the $7.8 million urban road upgrade, offering major savings.

Additional Observations on SEE Analysis

A significant issue with the SEE evaluation is that Alternative 3 is being compressed into a smaller footprint, unlike other alternatives. This narrower design was used to avoid triggering eminent domain—but it introduces design compromises that other routes weren't subjected to. Evaluating Alternative 3 under a reduced standard, while holding Alternative 4 to full-width impacts, skews the comparison unfairly.

If Alternative 4 had been evaluated using the same modified criteria applied to Alternative 3, it likely would have demonstrated even lower impacts and costs. It would not require a $2.3 million noise wall or a $7.8 million urban roadway segment for a single subdivision. These mitigation expenses are unique to Alternative 3 and should have weighed more heavily in the final evaluation.

Yet, despite meeting the Memorandum's documented purpose-and-need criteria, Alternative 4 was excluded from further study. This exclusion prevented stakeholders and decision-makers from conducting a side-by-side comparison that may have changed the preferred route recommendation.

Concerns About Reliability and Data Integrity

These discrepancies—many of which are easily verified through public records and basic math—raise larger concerns. If simple elements like color coding, impact counts, and buffer zones contain inaccuracies, it's reasonable to question how much of the remaining analysis is similarly flawed or selectively framed.

One specific example involves the use of thresholds in data visualization. A floodplain encroachment of 636 feet is marked as "green" because WSB selected 699 feet as the cut-off. The proximity of these values—just below the threshold—suggests the metric may have been chosen to present the encroachment in a more favorable light.

This practice is troubling, particularly when:

- The Shady Hills subdivision, developed within this same floodplain, led to significant flooding in nearby areas.
- The risks of similar outcomes from this project remain unaddressed in the Memorandum.

Would encroaching 699 feet into a floodplain truly avoid adverse impacts, or does that threshold merely serve a convenient narrative?

Missed Environmental and Community Impacts

Beyond the concerns above, the SEE report fails to address several key impacts that are typically required in environmental reviews. These include:

- Environmental Justice
- Climate Change and Greenhouse Gas Emissions
- Archaeological and Historical Resources
- Construction Impacts
- Energy Use
- Visual Impacts
- Tax Base and Property Value Effects
- Air Quality
- Wildlife, Fisheries, and Protected Species
- Vegetation
- Floodplains, Hydrology, and Aquifer Impacts
- Health Impacts
- Socioeconomic Disparities
- Light Pollution

Summary of SEE Discrepancies

The SEE analysis appears skewed in favor of Alternative 3 by:

- Understating residential impacts
- Downplaying utility relocation costs
- Applying inconsistent cost thresholds
- Using noise receptor buffers below MnDOT standards
- Comparing routes under different design assumptions

If Alternative 4 had been evaluated on equal terms—with full width right-of-ways, accurate relocation counts, and real-world mitigation costs—it would likely have emerged as significantly less impactful and more cost-effective than Alternative 3.

If a project costing under $30 million is considered favorable, then a valid question remains: Would Alternative 4—if properly evaluated—have cost closer to $20 million? If so, would the benchmark for a “good value” remain fixed at $30 million?

In light of the inconsistencies, omissions, and selectively applied thresholds, stakeholders are justified in questioning whether the Memorandum truly reflects a neutral and comprehensive evaluation, or if it was structured to support a preselected outcome—a violation of the environmental process.

These inconsistencies call into question the overall accuracy and objectivity of the Memorandum's conclusions.

Page 15: SEE Summary: Unequal Treatment of Neighborhoods

Alternative 2, which runs adjacent to Hill Drive, is shown to require 10 residential relocations—a number acknowledged in the SEE analysis and seemingly used to justify rerouting that segment.

In sharp contrast, Alternative 3 relies on a mapped 150-foot-wide right-of-way that cuts directly through the North Country Subdivision, where homes have already been built. This right-of-way was officially mapped in 2000 (Doc: A280471), but the land was later developed with full city permits and no recorded objections or restrictions. Residents built legally and in good faith—never informed that their homes were on a corridor that would be reclaimed.

Despite this, the SEE analysis lists zero relocations for Alternative 3.

Meanwhile, Alternative 4, which runs adjacent to residential properties but does not encroach on residential land, is rated more negatively and was dismissed from further study.

The Memorandum statement "By Veering east, the segment of Alternative 3 north of Rose St avoids impacting the established neighborhood between Dane Rd and 26th St NE that Alternative 2 would go through" is key because it shows that WSB and Steele County made deliberate design choices to avoid one established neighborhood (Hill Drive), while failing to apply the same standard to North Country.

> While Alternative 2 scored similarly to Alternative 3 in many of the SEE categories and additional considerations, it would potentially result in the need for 10 residential relocations. By veering east, the segment of Alternative 3 north of Rose St avoids impacting the established neighborhood between Dane Rd and 26th St NE that Alternative 2 would go through.

The comparative logic applied here is inconsistent and difficult to justify.

Visual Evidence of Encroachment

Figure R2 clearly shows the officially mapped right-of-way overlapping with existing residential parcels in the North Country Subdivision. These are not future development sites—they are occupied homes. Yet the evaluation treats this encroachment as inconsequential, while simultaneously treating adjacent routing under Alternative 4 as a disqualifying factor.

At the same time, the Shady Hills Subdivision, which consists of undeveloped lots, appears to have received proactive protection through alignment shifts that preserved its future development space. No such adjustments were made for North Country residents, despite their properties being directly affected.

Figure R2: Officially Mapped Right of Way—Encroachment of North Country Subdivision

Implications of the Development Overlap

The decision to continue planning Alternative 3 implies that the county intends to build a high-speed road through a neighborhood that was legally permitted and developed, rather than adjusting the alignment or compensating impacted families.

This situation should require eminent domain, relocations, or a drastically reduced road footprint. However, instead of acknowledging this, the city and county are proposing to compress the corridor into just 100 feet because they cannot afford the cost of acquiring the developed land.

This places the burden of a funding shortfall on homeowners—forcing them to live just feet from a high-speed arterial without adequate buffer zones. It also introduces long-term safety concerns, design compromises, and degradation of quality of life, none of which are accounted for in the current evaluation.

By contrast, undeveloped lots in the Shady Hills subdivision were actively avoided in Alternative 2. More care was given to protecting future development than to mitigating harm to current residents.

Summary
The SEE analysis treats North Country as if it were undeveloped, despite the fact that the officially mapped corridor runs through existing residential properties**.** The failure to recognize, acknowledge, or mitigate this conflict reveals a serious inconsistency in how impacts were assigned and evaluated.

The result is a contradictory and inequitable assessment. If the goal of the Memorandum is to avoid or minimize residential impacts, then Alternative 4 should have remained under consideration while Alternative 3 should have triggered a more serious relocation count.

Page 17: Socioeconomic Disparities and Disproportionate Burden on Working-Class Families

Disproportionate Impacts on Working-Class Neighborhoods
The North Country Subdivision is located within a working-class neighborhood, built as part of the 2004 housing boom to address affordability and access. This area is home to numerous essential workers, multi-generational families, and residents with disabilities. Many homeowners in this subdivision live paycheck to paycheck, with limited capacity to absorb the disruption of relocation, construction, or prolonged uncertainty.

Yet, this community bears the most direct impact under Alternative 3—despite being the only route that requires a noise wall, encroaches on private residential property, and necessitates urban road modifications costing millions.

Although the proposed corridor is designed to be 150 feet of right-of-way, North Country residents own 50 feet of that corridor—land sold and permitted for housing after plans for the road were effectively abandoned in 2004. That year, the U.S. 14 Beltline Study recommended shifting the alignment to 34th Avenue (Alternative 5 today).

> A north-south corridor between 26th St NE and US 14 was officially mapped in 2000 based on a resolution passed by the Steele County Board of Commissioners on June 22, 1999. The official map depicts a right of way width of 150 feet (**Figure 1**).

Since then, homes were built with city approval on property no longer considered active right-of-way. Residents were told the road would not become a major highway. However, the current Memorandum classifies the route as a "major collector," confirming its highway-grade design.

> A new, north-south roadway on the east side of Owatonna would be owned and maintained by Steele County as a County State Aid Highway (CSAH), and would likely be classified as a major collector. The intent is for the new north-south roadway to connect to several collector roadways potentially including CSAH 8 (Kenyon Rd), CSAH 35 (Dane Rd), CSAH 19 (Rose St), and CR 180, along with several local roadways.

This deception—and the manner in which it's been handled— raises serious ethical and procedural questions.

Key Concerns Raised by Affected Residents:

Transparency

- Why haven't these facts been openly and honestly communicated to residents, elected officials, and the government?
- Why were homeowners allowed to build in this corridor?

Equal Treatment

- Why are these residents being asked to accept a compressed design while other properties and subdivisions were proactively avoided**?**
- Why wasn't Alternative 4 retained for further study, when it avoids this neighborhood entirely?

By Avoiding Eminent Domain, New Harms Are Introduced

To avoid property acquisition, planners reduced the design width to just 100 feet—bringing the highway within 17 feet of existing homes. This creates new and significant disparities:

Safety Concerns

- A high-speed corridor this close to occupied homes introduces clear risks.
- Yet, no formal safety study has been provided to assess the impact on nearby residents.

Property Devaluation

- No property value impact analysis has been conducted, despite the potential loss in home equity.

Socioeconomic Discrimination

- This neighborhood includes working-class families, individuals with disabilities, and those with limited means to fight back.
- Avoiding impact in more politically influential or undeveloped areas while compressing the design through North Country appears inequitable—and raises potential conflicts of interest**.**

Conclusion
Decisions of this scale must be rooted in honest communication, fair treatment, and thorough analysis. Before this highway is pushed within feet of homes that were built in good faith, the following must occur:

- Full evaluation of less harmful alternatives
- The corridor's history must be transparently acknowledged
- Independent analysis of safety and economic impacts should be conducted

Residents of North Country deserve the same level of protection and due process as any other community.

Page 18: The Mapped Right-of-Way: Abandonment, Reuse, and Legal Conflicts

The Legality and History of the Right-of-Way

Figure 1 from the Memorandum depicts the "Officially Mapped Corridor" officially filed in 2000 as a 150-foot-wide right-of-way, in today's footprint. At the time, the land was largely undeveloped and reserved on paper for potential future use. On March 9, 2004, a Joint Powers Agreement between the City of Owatonna and Steele County was signed. This agreement gave both entities:

- First right of refusal on development within the corridor,
- The ability to purchase property, and
- A six-month window to delay or contest development on any affected parcels.

In August 2004, just five months later, the U.S. 14 Beltline Study formally recommended routing the corridor along 34th Avenue (Alternative 5) instead. This marked a turning point. The original 150' corridor was effectively abandoned in practice—but not officially vacated.

Despite having legal tools to prevent conflict, the first home was built within the mapped corridor just six months after the Joint Powers Agreement was signed, and no contest or purchase attempt was made. Over time, a fully developed residential neighborhood—North Country Subdivision—emerged along the corridor.

Steele County and the City of Owatonna, did not retain easement rights, nor did it file legal claims to preserve the corridor through North Country. In fact, the county formally mapped 34th Avenue (Alternative 5) in 2009 as the replacement route. The city did not purchase the outlots until 2018—after years of foreclosure and conveniently timed with the reemergence of East Side Corridor planning efforts.

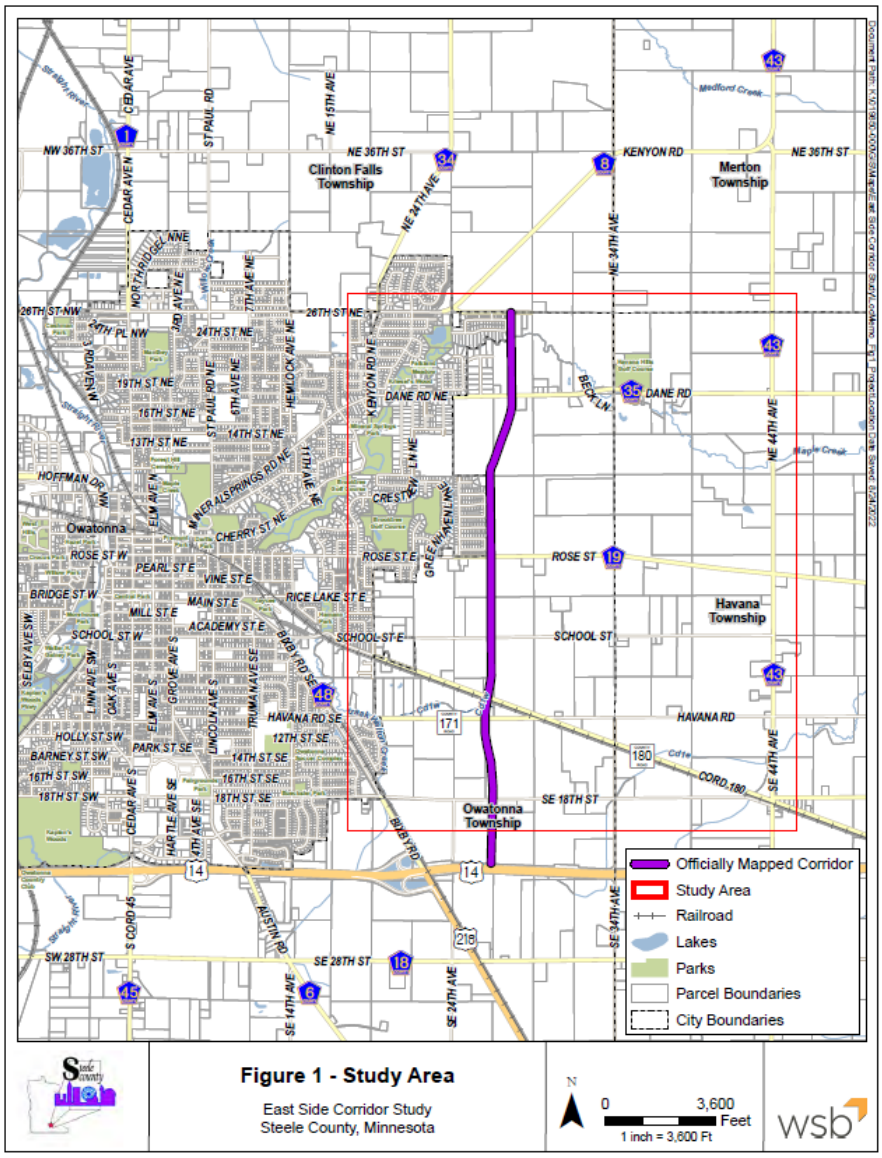
Today, 50 feet of the 150-foot-wide corridor runs through these private, occupied properties. Yet no formal relocation plans, compensation offers, or mitigation strategies have been proposed.

Legal and Ethical Concerns

The Memorandum treats this area as if it remains an active corridor, despite the fact that:

- No right-of-way was recorded or preserved,
- Residents hold legal title to portions of the route,
- And no compensation or eminent domain process has been initiated.

Attempting to reassert use of this land without legal proceedings may conflict with property law and raises serious liability risks for both the city, county, and state.



Internal Awareness—And Withholding of Critical Information

The seriousness of this situation was not publicly acknowledged until November 2023, when North Country residents raised the issue during public comment. Until that moment, County Engineer Greg Ilkka was unaware that the corridor directly overlapped with private homes.

However, the then Assistant County Engineer, Paul Sponholz—who serves as the project lead— had access to the data and mapping that confirmed this direct encroachment. Despite this, he did not disclose the information to the public or to elected officials. Instead:

- He offered assurances that the project would run adjacent to, not through, residential properties;
- He downplayed impacts and stated that mitigation measures such as noise walls were unnecessary;
- He collaborated with WSB to shift publicly released maps 25 feet east—not to change the actual alignment, but to visually reduce perceived impacts on North Country homes.

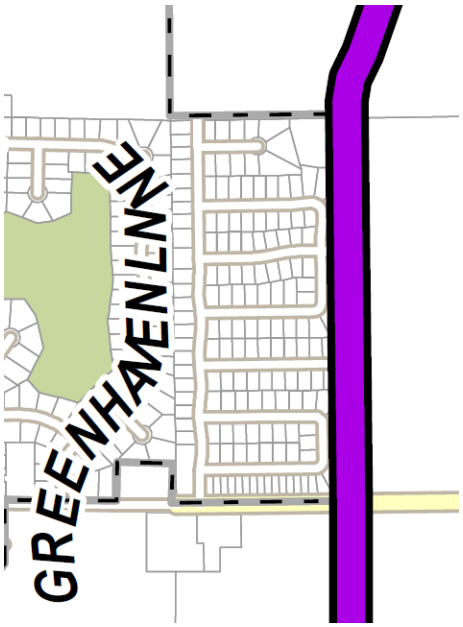
This pattern of omission and misrepresentation undermines the transparency, integrity, and credibility of the entire planning process.

Why This Matters

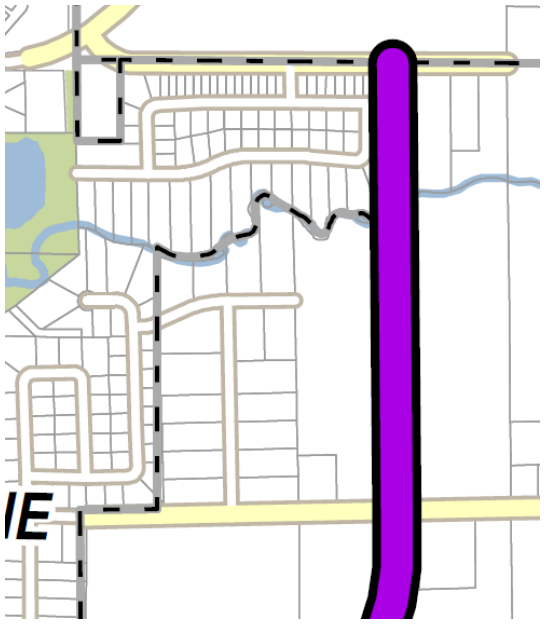
Public agencies are entrusted to act with transparency and prioritize the safety and well-being of residents. In this case:

- The County relinquished its corridor rights in 2004, allowing legal development of homes now directly affected by the project;
- Today's leadership has not fully disclosed these implications to the public or elected officials.

This is more than a technical oversight—it suggests potential negligence, possible misconduct, and certainly a failure of ethical governance.



A closer examination clearly reveals the encroachment affecting North Country residents.



Similar encroachment is observed in the Shady Hills Subdivision, though it involves undeveloped lots.

Unequal Protections: A Tale of Two Neighborhoods

The images below reveal a stark contrast. In Shady Hills, a more affluent subdivision, the route was shifted to protect future development. In North Country—where working-class families already live—no such effort was made. Homes were legally built after the county abandoned the idea of this location, proposed a highway within feet of homes.

This unequal treatment raises serious concerns about transparency, fairness, and the values guiding public decisions. It reinforces existing social and economic divides—and leaves residents wondering if this document fairly evaluated alternative or was written to uphold a predetermined plan.

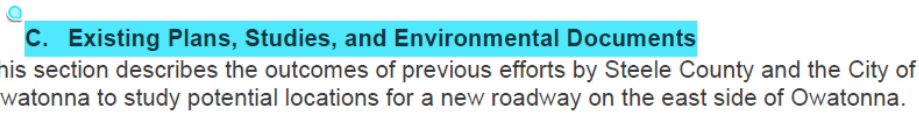
While the corridor still appears on maps, its legitimacy has eroded. Years of abandonment, approved development, and omission of key facts from the Memorandum undermine its legal and ethical standing. Reviving it now risks violating property rights and public trust.

Reviving a corridor through private property that was sold and developed in good faith more than 20 years ago undermines basic legal principles. It violates the public trust and may expose local and state agencies to legal and financial consequences.

Page 19: Past studies

Residents have long pointed to previous Beltline studies to highlight inconsistencies with the current East Side Corridor proposal. In response, officials often claim that past reports no longer apply because "this is a new project with a new purpose."

Yet, the Memorandum selectively relies on those same past studies to justify its current alignment, while ignoring inconvenient findings.



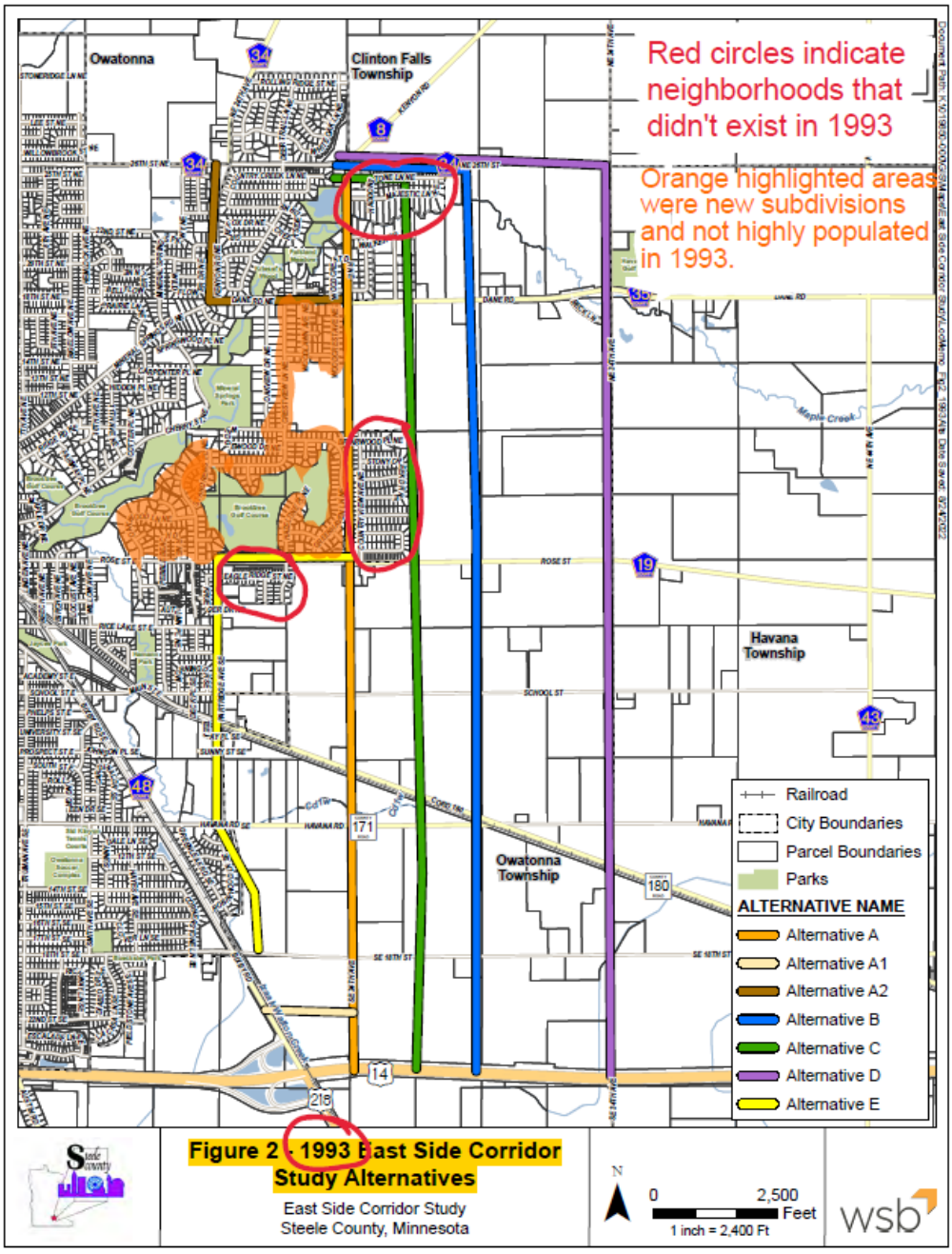
C. Existing Plans, Studies, and Environmental Documents

This section describes the outcomes of previous efforts by Steele County and the City of Owatonna to study potential locations for a new roadway on the east side of Owatonna.

One clear example is the Memorandum's use of *Figure 2*, which is labeled as representing alternatives from 1993. However, the map reflects today's footprint, not the 1993 alignment. This creates a misleading impression that the route was approved decades ago with full awareness of subdivisions that did not yet exist.

1. **Owatonna East Side Corridor Study (1993)**

This study, conducted by the City of Owatonna and Steele County, examined several location alternatives for an east side corridor (**Figure 2**). The primary need for the new roadway was



Figures R3 and R4 (below) show what Owatonna actually looked like in the 1990s.

1995 EA, Page 9: Alternatives Reflective of the 1993 Time Period

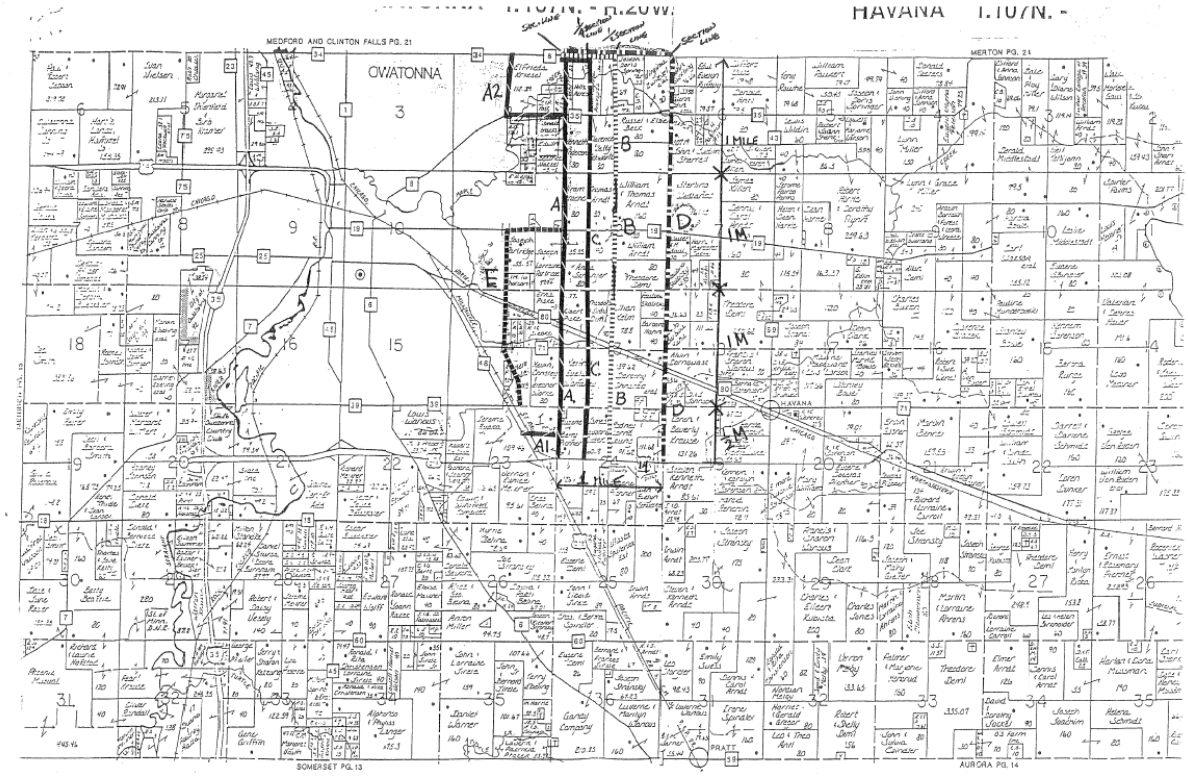


Figure R3: Maps the original 1990s alternatives, all located outside current city limits.

Figure R4: Shows the 1995 landscape; most subdivisions now being impacted—including Greenhaven—were not yet built (red pin marks a current home location).

The Memorandum also mischaracterizes 24th Avenue. On page 3, it states that the corridor is "similar" to the current mapped right-of-way. In reality, 24th Avenue—referred to as Alternative A in the 1990s (Alternative 1 today)—was rejected in the 1995 Environmental Assessment and 1999 EAW due to its proximity to homes and associated noise impacts, the very same impacts today.

As a result, the route was shifted 1,200 feet east—toward what is now Alternative C (Alternative 3/29th Avenue)—and officially mapped in 2000. Despite this, the Memorandum claims 24th Avenue was part of the mapped right-of-way, contradicting the historical record.

> The furthest west of these alignments was Alternative A, which is immediately east of US 218 or along the section line generally aligned with 24th Avenue East. The furthest east (Alternative D) was located at 34th Avenue East, one mile east of Alternative A. Alternative A was selected as the preferred alternative for the 1993 study because it would provide the most immediate benefit to traffic due to its proximity to existing developed areas.
>
> Alternative C most closely matches the officially mapped corridor. The 1993 study outlined several advantages and disadvantages of Alternative C, listed below. Note that several items such as the connection to US 14 are no longer applicable.

Disadvantages to Alternative C: The Memorandum omits 2 additional disadvantages, including deviations around Echo Heights, as seen on official copies of the 1993 report on page 5, shown in Figure R5.

Disadvantages:

1. No existing right of way on north/south segment.
2. Cuts through Schlinger farm.
3. Cuts through 160-acre Wandry farm.
4. Possible wetlands in section 12.
5. Possible conflict with radio tower, may require some adjustment in alignment.
6. Connection to US 14 would be closer to interchange and would require MnDOT permission.

Memorandum Page 16

DISADVANTAGES:

1. No existing right-of-way on north/south segment.
2. Cuts through Schlinger farm.
3. Cuts through 160 Ac. Wandry farm.
4. Possible wetlands in section 12.
5. Possible conflict with radio tower, may require some adjustment in alignment.
6. Connection to T.H. 14 would be closer to interchange and would require MNDOT permission.

7. REQUIRES SOME realignment around Echo Heights houses.

8. SKIRTS A WETLANDS AREA.

Figure R5 – Alternative C Disadvantages from 1993 Study

These discrepancies point to a troubling pattern: selective reliance on historical data when it supports the current plan, and dismissal of that same data when it raises legitimate concerns.

Page 21: 1995 Environmental Assessment (EA)

The 1995 Environmental Assessment (EA) narrowed the project to two corridors—Alternative A and Alternative C—as seen in the conclusions section on page 85 of the 1995 EA (Figure R6). Contrary to the Memorandum's claim that no preferred alignment was identified, these two routes were explicitly carried forward to the 1999 EAW.

Conclusions

The projected growth in the City of Owatonna and Owatonna Township's east side will definitely result in capacity problems on existing City streets if no east side corridor is constructed. The distance of the corridor from existing City boundaries has a distinct impact on the level to which the corridor can relieve projected traffic growth on existing City streets.

Alternatives A and C are superior to Alternatives B and D in their ability to serve projected and existing development and route traffic away from the use of Mineral Springs Road, Rose Street and the downtown area.

Figure R6 – Conclusions section of the 1995 Environmental Assessment

This Memorandum asserts that Alternative C would not impact native prairie. However, page 49 of the 1995 EA highlights significant concerns raised by the Minnesota Department of Natural Resources (DNR) about the contiguous native prairie habitat along County Road 80. Figure R7 illustrates the DNR's concerns regarding this habitat, while Figure R8 confirms that the wetlands affected by this project include vegetation classified as wet prairie.

According to the 1995 plat maps (Figure R9), what is referred to today as County Road 180 or Claremont Road was previously known as County Road 80. Additionally, Figure R10 demonstrates that the native prairie habitat not only runs directly through every proposed corridor but also extends beyond the study area.

In contrast to the claims in this Memorandum, the documentation from the 1995 EA clearly shows that Alternative C does, in fact, affect native prairie habitat.

As I indicated to you on the telephone earlier today, we are very concerned about perpetuation of these rare native species by maintaining native habitats in which they occur. In addition to the location of rare plants on your print-out, we have records for several threatened and rare plant species along County Road 80 east of the project area depicted on your map. There is continuous native prairie habitat along this road. The DNR Roadside Coordinator, Cathy Fouchi, surveyed a portion of the County Road 80 right-of-way on June 2, 1994 and confirmed that several rare plants still occur in the prairie remnants. During the preliminary planning stages of the Owatonna East Corridor, special consideration should be given to protecting any mesic native prairie remnants, which may support these listed and rare species. I recommend that you contact Cathy Fouchi in New Ulm at 507/359-6034 to coordinate protection planning efforts.

Figure R7 – Page 49 of the 1995 EA report detailing the DNR's concerns about prairie habitat.

Wetlands along the DME railroad and C.R. 80 right-of-ways are classified as palustrine emergent with seasonal flooding. The vegetation type is wet prairie.

Figure R8 – Page 40 of the 1995 EA report documenting wet prairie vegetation along County Road 80.

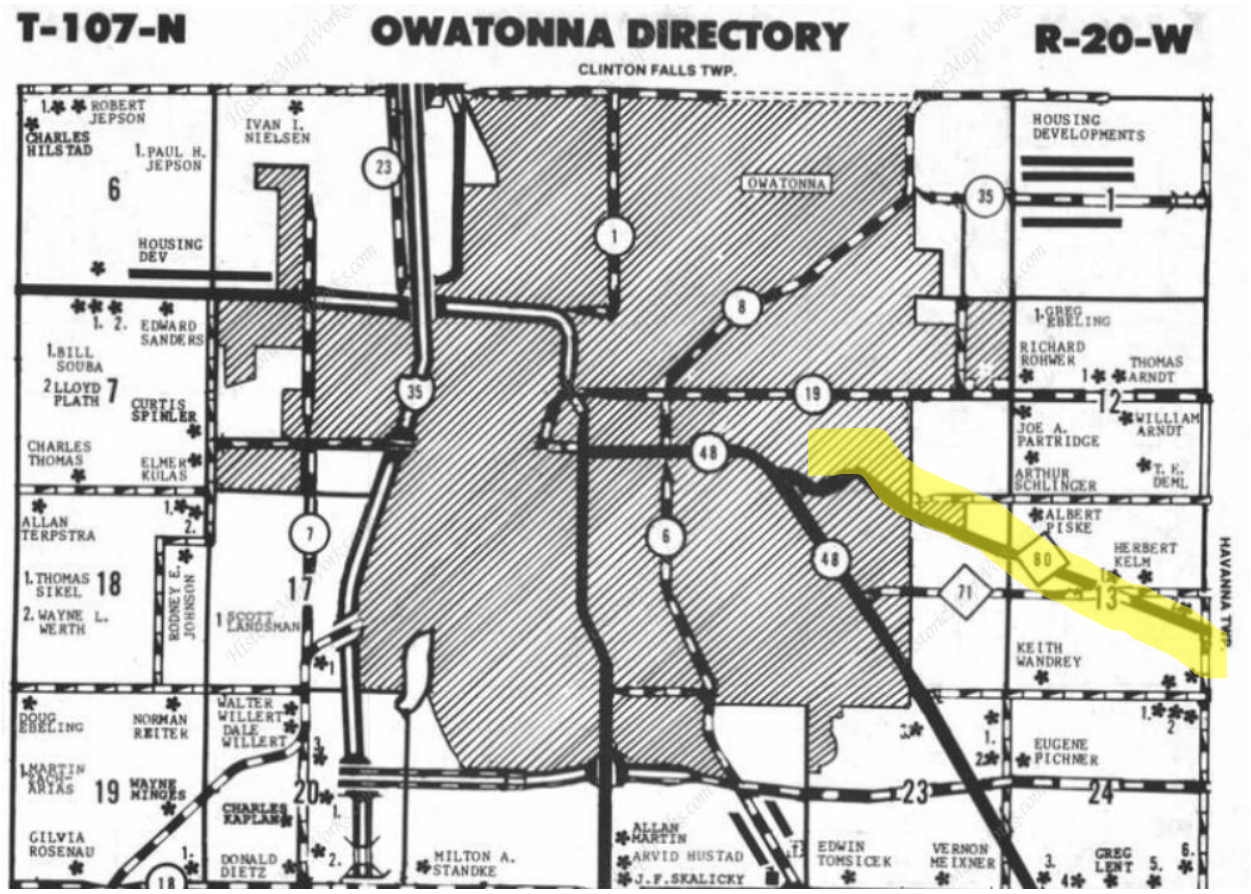


Figure R9 – 1995 Plat Map highlighting County Road 80.

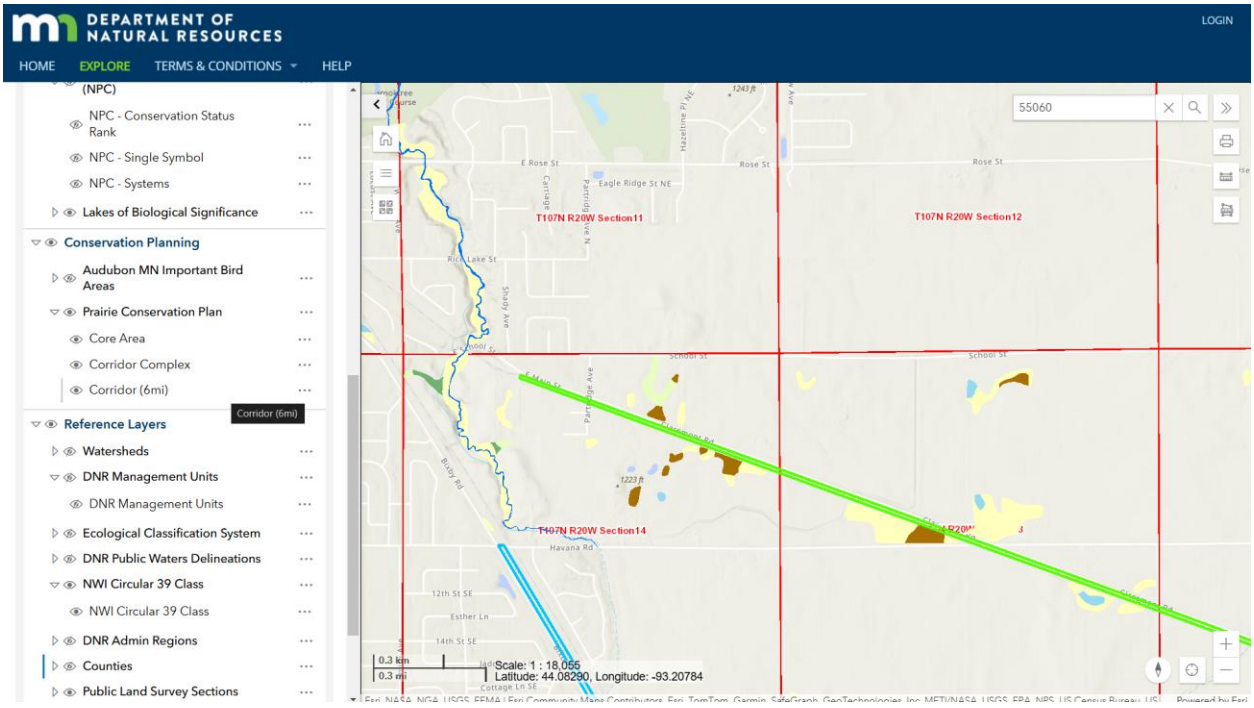


Figure R10 - MN DNR map of prairie wetlands along County Road 180/80.

The Memorandum references an October 18, 1994 meeting as context for route elimination. However, no documentation of this meeting has been made publicly available. When closed-door discussions influence long-term infrastructure decisions, transparency becomes not just ethical—but essential. Why wasn't this documentation made public like other historical reports?

> A public information meeting was held on August 30, 1994. Staff from the Minnesota Department of Natural Resources (DNR), Minnesota Department of Transportation (MnDOT), and the U.S. Soil Conservation Service (SCS) also met on October 18, 1994, to discuss the potential natural resource implications of the project.

While Alternative C was the closest to today's Alternative 3 in following the ¼ section line, the 1995 EA found that it would impact homes on Hill Drive—the only established neighborhood along the route at the time (Figure R11). To mitigate those impacts, the alignment was shifted east, creating a buffer of approximately 1,200 feet from existing homes along the rest of the route.

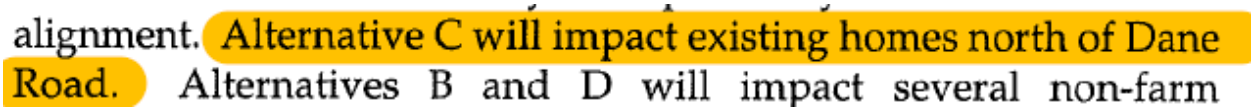

alignment. Alternative C will impact existing homes north of Dane Road. Alternatives B and D will impact several non-farm

Figure R11 – 1995 EA, page 18, noting the impact to existing residents on Hill Drive.

The 1995 EA also examined noise impacts from Alternative A on Greenhaven Lane, which was in the earliest stages of development. As shown in Figure R12, Alternative C was projected to carry nearly as much traffic but with significantly fewer residential impacts—leading to its recommendation over Alternative A.

Notably, this recommendation was based on a neighborhood that was little more than platted at the time. Today, the same concerns apply: the impacts of Alternative A then, closely resemble those of today's Alternative 3 (29th Avenue), while Alternative C aligns more closely with today's Alternative 4, offering similar protective buffers.

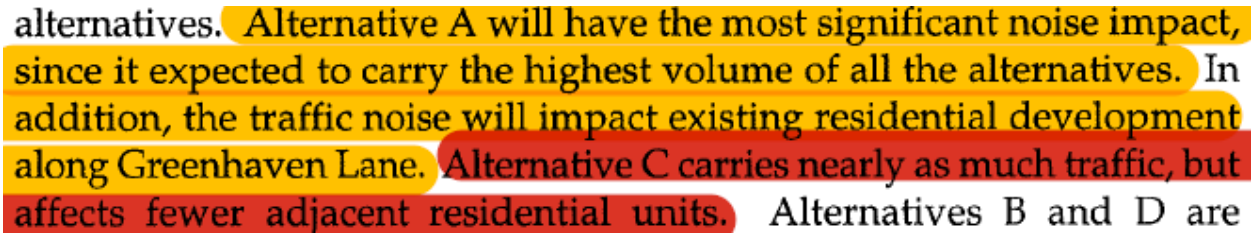

alternatives. Alternative A will have the most significant noise impact, since it expected to carry the highest volume of all the alternatives. In addition, the traffic noise will impact existing residential development along Greenhaven Lane. Alternative C carries nearly as much traffic, but affects fewer adjacent residential units. Alternatives B and D are

Figure R12 – 1995 EA, page 33, noting the residential impacts of routes located too close to residential properties.

The Memorandum does not provide Average Daily Traffic (ADT) projections for any of the proposed routes. While it discusses potential reductions in downtown congestion, no route-specific traffic data has been shared with residents. Instead, the public has been told to expect approximately 5,000 vehicles per day—without any supporting documentation.

This figure sharply contrasts with the 1995 EA, which projected up to 12,000 vehicles per day between Dane Road and Rose Street (Figure R13). Since then, both population and development have grown significantly, making it difficult to reconcile how current volumes would be less than half of what was estimated 30 years ago.

Alternative A itself is expected to have an ADT volume ranging from 3200 just north of T.H. 14 to over 12,000 between Dane Road and Rose Street.

The projected ADT volumes on Alternative C range from 2600 just north of T.H. 14 to over 12,000 between Dane Road and Rose Street.

Figure R13 – 1995 EA, pages 15 and 18, showing ADT estimates.

The 1995 EA included clear recommendations to protect surrounding neighborhoods. As shown in Figure R14, these included: “Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation.” The EA also emphasized creating safety buffers and adding landscaping between homes and the corridor.

At the time, this guidance could have been followed with minimal impact—since subdivisions like North Country and Shady Hills had not yet been developed. Today, those same areas are built out, yet the mapped right-of-way remains unchanged. Instead of acquiring or relocating affected properties, Steele County and the City of Owatonna are moving forward with plans to place a high-speed road within feet of existing homes.

For over two years, residents have stressed the importance of a safety buffer for a successful project, highlighting the dangers of relying on outdated 30-year-old plans that fail to reflect current realities.

Mitigation utilizing enhancement involves selecting feasible and effective "viewshed" considerations for the existing corridor area. The natural harmony, cultural order, and sense of design quality are all important elements.

Mitigation and Enhancement Techniques for Impacts to the Sense of Natural Harmony

- C Allow continued views of open and farmed areas outside of planned development areas;
- C Develop a landscaping plan to integrate the roadway into the surrounding natural and cultural environment;
- C Incorporate proper construction design to achieve the most visually acceptable and functional method for the roadway facility.

Mitigation and Enhancement Techniques for Impacts to the Sense of Cultural Order

- C Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation;
- C Investigate integrated pedestrian areas which will not disrupt use of existing neighboring properties but provide a pleasing, safe passage throughout the project area;
- C Appurtenances, all the non-structural items which are part of the roadway, should be visually coordinated and standardized. This includes signs, rails, fences, wall, berms, lights (if necessary), safety barriers, etc..

Mitigation and Enhancement Techniques for Impacts to the Sense of Design Quality

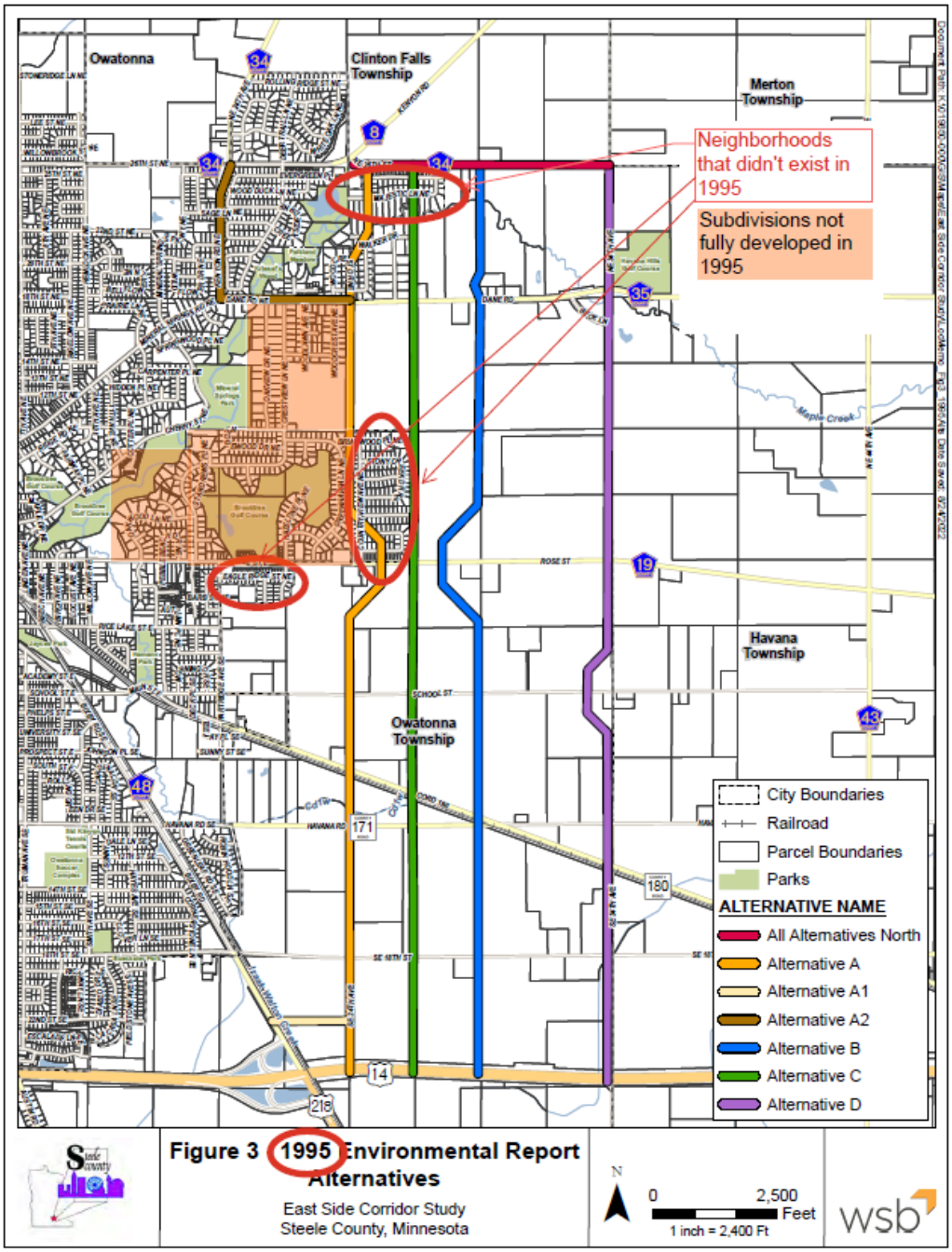
- C Provide a well-defined roadway surface showing continuous horizontal direction and movement;
- C Integrate a landscape plan that is functional and provides a connection in the project corridor;
- C Maple Creek Bridge. This is a key visual resource. The design and construction of the bridge should have features that are sensitive to the local natural and cultural environment. This includes design type, building materials, and colors.

Figure R14 – 1995 EA recommendations for a successful project, as seen on page 28.

Page 22: Inaccurate Landscape Representation and Misleading Data

Page 22 features another map—similar to that on page 20—that inaccurately depicts all alternatives using today's landscape rather than conditions from 1995. These visuals falsely imply that subdivisions now in place existed at the time of decision-making.

This misrepresentation distorts how alternatives were evaluated and misleads readers into believing current developments were part of the original analysis. By presenting modern data as if it informed historic decisions, the Memorandum gives a false sense of due diligence and undermines public trust in the process.



Page 23: 1999 EAW

The 1999 Environmental Assessment Worksheet (EAW) acknowledged that shifting the corridor too far east would reduce its benefits. Still, it explicitly recommended an 800-foot setback and a 150-foot right-of-way to protect existing subdivisions from noise impacts (Figure R15). These figures were not arbitrary—they were selected to comply with Minnesota's noise pollution regulations. This information was omitted from the Memorandum, despite the public addressing it many times.

The design speed of the roadway and the amount of truck traffic will be the most important factors in whether or not he adjacent sensitive receptors will experience noise levels exceeding state and federal standards. The proposed roadway is planned to be separated form existing residences by approximately 800 feet. Landscaped boulevards and berms provide a soft, absorptive surface which helps reduce the amount of noise which reaches the sensitive receptors. The 150 foot right-of-way anticipated for this corridor will provide adequate space to design these absorptive surfaces if necessary.

Figure R15 – Page 11 of the 1999 EAW, highlighting the necessary avoidance measures to prevent noise impacts.

Noise Regulations

The recommended 800-foot setback and 150-foot right-of-way were not arbitrary—they were purposefully selected to reduce noise exposure for nearby residents. In the 1990s, project consultants followed the regulatory principle of "avoid, minimize, mitigate," placing resident safety at the forefront. Today, Minnesota Rule Chapter 7030: Noise Pollution Control serves as a benchmark for appropriate separation between roadways and homes. As shown in Figure R16, municipalities are legally responsible for preventing land use decisions that would result in immediate noise violations.

7030.0030 NOISE CONTROL REQUIREMENT.

No person may violate the standards established in part 7030.0040, unless exempted by Minnesota Statutes, section 116.07, subdivision 2a. Any municipality having authority to regulate land use shall take all reasonable measures within its jurisdiction to prevent the establishment of land use activities listed in noise area classification (NAC) 1, 2, or 3 in any location where the standards established in part 7030.0040 will be violated immediately upon establishment of the land use.

Figure R16 – Minnesota Noise Pollution Rules: https://www.revisor.mn.gov/rules/7030.0030/

Minnesota Rule 7030.0050 classifies homes, schools, and hospitals as Noise Area Classification 1, where noise cannot exceed 65 dBA for more than 10 minutes per hour or 60 dBA for more than 30 minutes per hour during the day. Nighttime limits are even stricter, set at 55 dBA and 50 dBA, respectively (Figure R17), due to the well-documented health risks of disrupted sleep and prolonged exposure.

Highways—especially truck routes like the proposed East Side Corridor—often exceed 90 dBA, far surpassing legal thresholds. Even typical road noise averages around 70 dBA, which is still above regulatory limits. This is precisely why 1990s consultants placed the corridor over 800 feet from existing homes—a critical buffer now being disregarded, despite repeated concerns raised by residents.

7030.0040 NOISE STANDARDS.

Subpart 1. **Scope.** These standards describe the limiting levels of sound established on the basis of present knowledge for the preservation of public health and welfare. These standards are consistent with speech, sleep, annoyance, and hearing conservation requirements for receivers within areas grouped according to land activities by the noise area classification (NAC) system established in part 7030.0050. However, these standards do not, by themselves, identify the limiting levels of impulsive noise needed for the preservation of public health and welfare. Noise standards in subpart 2 apply to all sources.

Subp. 2. **Noise standards.**

Noise Area Classification	Daytime		Nighttime	
	L_{50}	L_{10}	L_{50}	L_{10}
1	60	65	50	55

Figure R17 – Minnesota Maximum Noise Regulations: https://www.revisor.mn.gov/rules/7030.0040/

Why 800ft?

Figure R18 outlines vehicle classifications over 10,000 pounds—including semi-trucks, school buses, garbage trucks, delivery vehicles, construction equipment, and emergency responders. These heavy vehicles are major contributors to roadway noise, particularly along designated truck routes like the proposed East Side Corridor.

Figure R19, based on MN Rule 7030.1040, shows noise limits for vehicles over 10,000 pounds**,** with Line A applying to those traveling above 35 mph. Even if the road is built at the far edge of a 100-foot right-of-way—leaving just 50 feet of separation—noise levels would still exceed 90 dBA. According to the chart, levels drop to the daytime legal limit of 65 dBA only at distances near 800 feet. This indicates that effective noise mitigation for truck traffic requires setbacks greater than 800 feet.

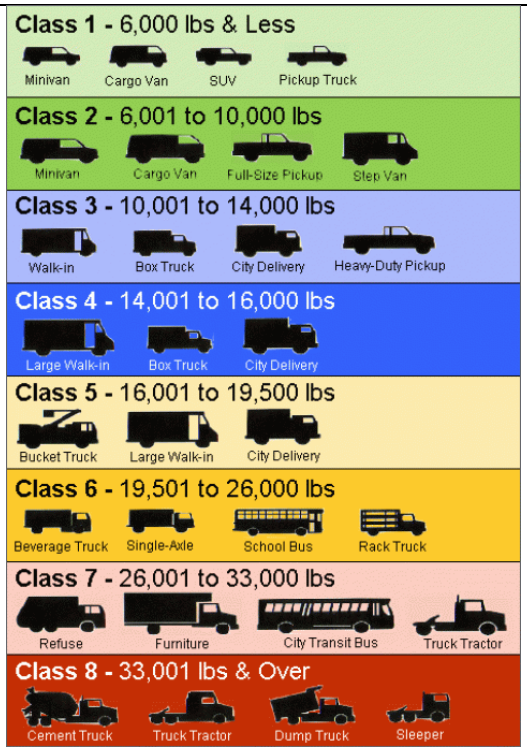


Figure R18 – Vehicle Classifications per the federal Government

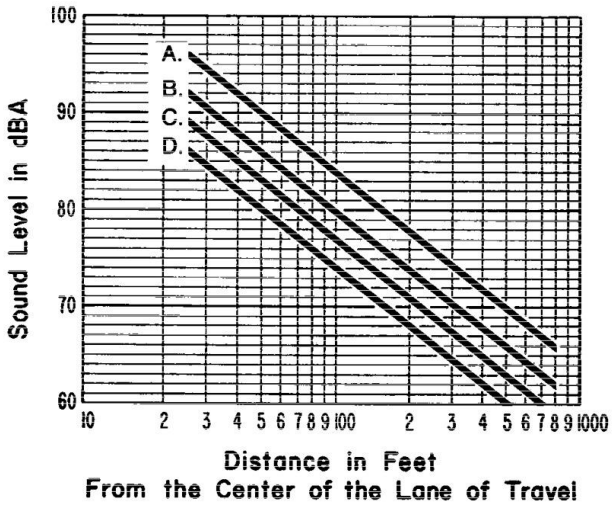


Figure R19 – Noise limits for vehicles over 10,000lbs
https://www.revisor.mn.gov/rules/7030.1040/

How many trucks per hour would exceed the 6-minute noise limit?

At 55 mph, the noise from a single truck lasts roughly one minute before dropping below safe levels. That means just six trucks or buses per hour would exceed the 6-minute exposure limit set by noise standards.

With an Average Daily Traffic (ADT) estimate of 5,000 vehicles and 2.8% classified as trucks, this threshold is already exceeded. Using historical traffic data—closer to 13,000 vehicles per day with 1.1% truck traffic—the limit is still surpassed.

Both scenarios fall short of the quoted 5–15% truck traffic and demonstrate that current setbacks are insufficient. To meet the 65 dBA daytime and even stricter 55 dBA nighttime standards, either truck volumes must be substantially reduced, or setbacks must exceed 800 feet.

What about other vehicles?

Noise concerns extend beyond trucks. Motorcycles and passenger cars also contribute significantly to cumulative exposure.

Figure R20 (Chapter 7030.1050) shows that motorcycles traveling 35 mph or faster can generate up to 90 dBA at a 35-foot setback. At 800 feet, those levels drop to a safer 60 dBA, within daytime legal limits.

Figure R21 shows that even standard vehicles, like personal cars, can exceed noise limits unless a 300-foot buffer is maintained.

With an ADT of 5,000 cars per day, evenly spaced, that's one vehicle every 17 seconds. A car traveling 600 feet at 40 mph takes about 10 seconds, meaning that at least 280 vehicles per hour would generate overlapping noise events.

In effect, passenger vehicles alone would push noise exposure beyond the 30-minute legal threshold, even without truck traffic.

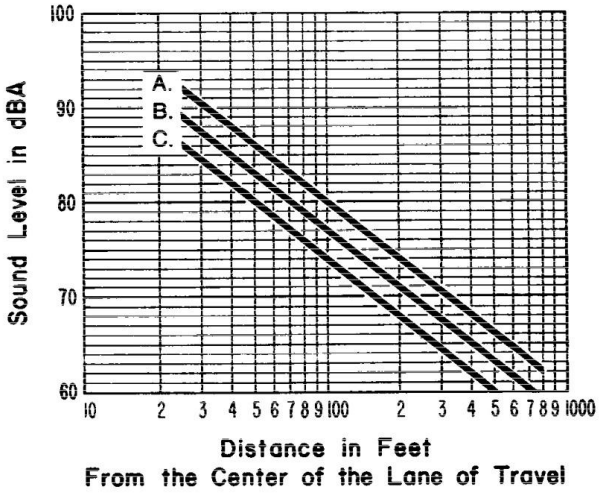


Figure R20 – Noise limits for Motorcycles
https://www.revisor.mn.gov/rules/7030.1050/

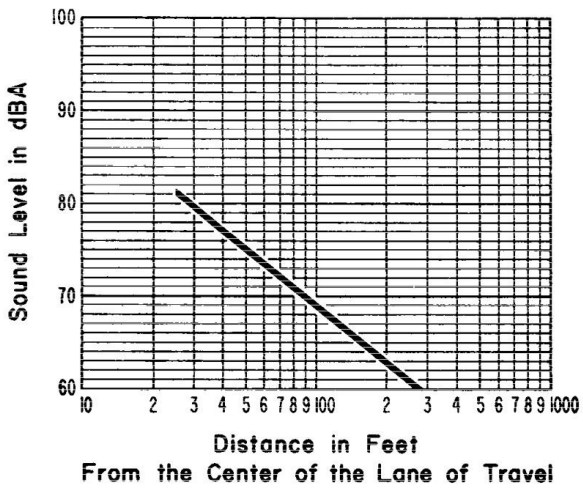


Figure R21 – Noise limits for other vehicles
https://www.revisor.mn.gov/rules/7030.1060/

These findings underscore the importance of aligning the corridor's design with existing noise regulations and maintaining adequate setbacks—especially given its designation as a truck route.

How Noise Affects Outcomes

The health risks of road noise are well-documented—from heart disease and cognitive delays to mental health challenges. These are preventable harms, and setbacks were designed to avoid them. The 800-foot buffer appears to reflect a balanced compromise: offering protection from truck noise (which may require over 1,000 feet) and vehicle traffic (which may require 300 feet), with a focus on public health.

Avoidance remains the most cost-effective and equitable solution. Ignoring these standards now—when communities were protected by them decades ago—leaves today's residents unfairly exposed.

Visual Impact Assessment (VIA)

The 1999 EAW (p.12) concluded that visual impacts, like glare from headlights and streetlights, would not be a concern because the route was set 800 feet from existing residences. This finding came from a Visual Impact Assessment (VIA) conducted during the 1995 Environmental Assessment (see Figure R14

above), which helped confirm the selected alignment. The VIA specifically recommended avoiding proximity to subdivisions, further supporting the need for a route that maintains distance from homes.

Expert Opinions

Page 23 of the current Memorandum briefly references agency concerns—but downplays their seriousness. As detailed on page 25 of the 1995 EAW, the Department of Natural Resources (DNR) warned that the proposed alignment conflicted with Steele County's water plan and posed risks to wildlife and wetlands—concerns that were ultimately dismissed.

The Minnesota Historical Society also raised major concerns, identifying two likely burial sites and warning of disturbance near Maple Creek. To avoid damaging culturally significant areas, the Society recommended limiting construction to locations previously disturbed by roadwork—such as the 34th Avenue corridor (Alternative 5).

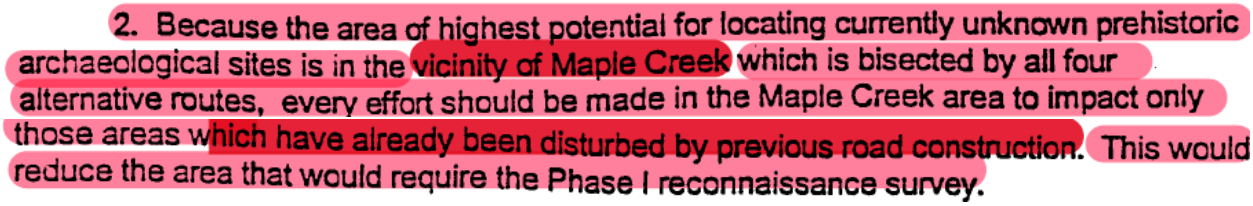

2. Because the area of highest potential for locating currently unknown prehistoric archaeological sites is in the vicinity of Maple Creek which is bisected by all four alternative routes, every effort should be made in the Maple Creek area to impact only those areas which have already been disturbed by previous road construction. This would reduce the area that would require the Phase I reconnaissance survey.

Figure R22 – Minnesota Historical Society's 1999 Recommendation

1999 EAW Findings

Although the 1999 Environmental Assessment Worksheet (EAW) concluded with a negative declaration for an Environmental Impact Statement (EIS), the EAW process itself was never completed. The absence of public comments suggests that final residential input was never collected, and the State of Minnesota has no record of the EAW being formally submitted. These oversights alone justify the need for a new and complete environmental review.

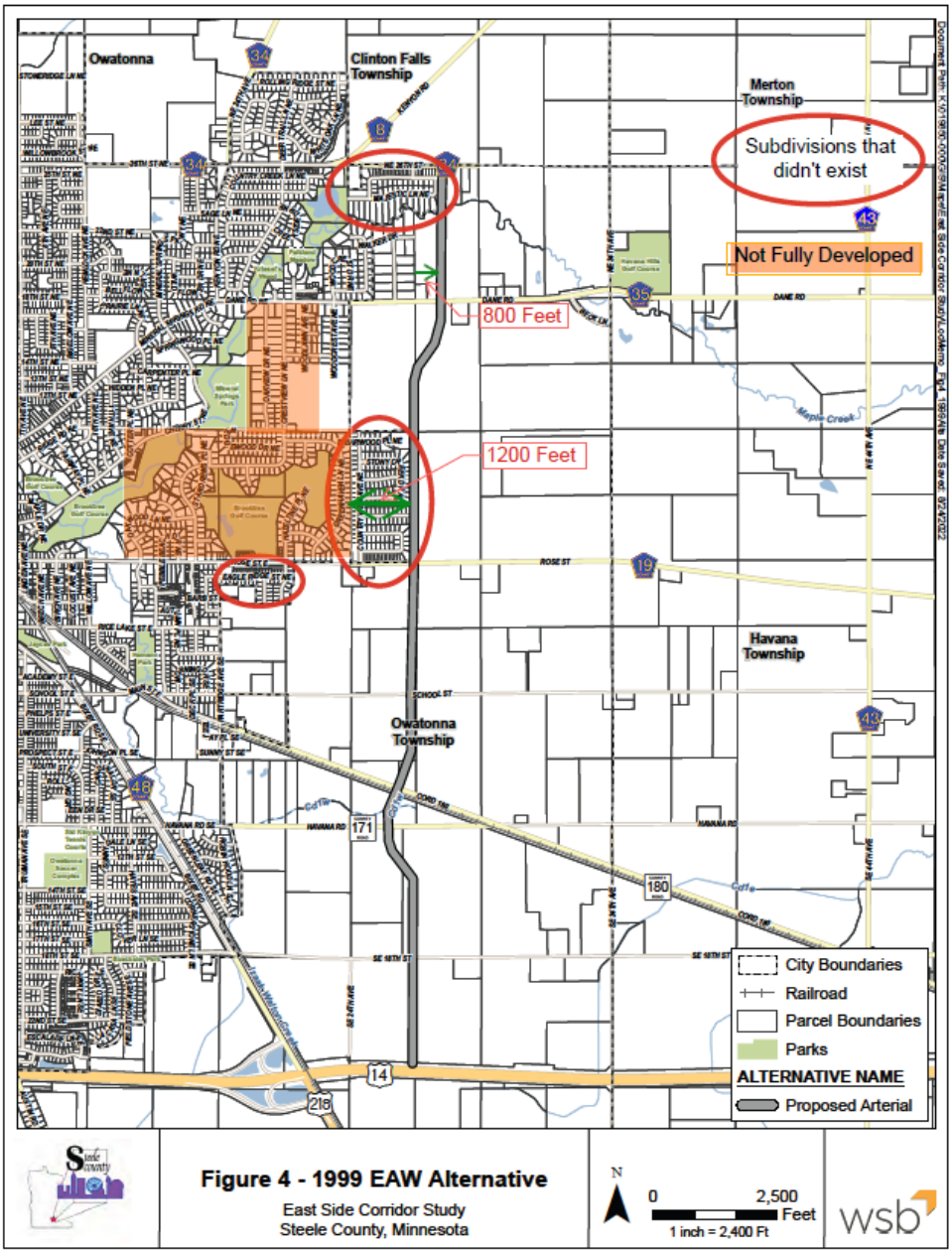
The EAW identified nine key issues, including noise impacts—and proposed a 150-foot right-of-way paired with an 800-foot setback from homes to avoid harm. This reflected a clear strategy of impact avoidance, in line with both environmental and ethical planning practices at the time.

Yet today, the current Memorandum selectively cites the 1999 EAW—leaving out key recommendations like the 800-foot setback and impact avoidance. These omissions distort the project's history and ignore the very measures that once shaped a less harmful alignment.

Page 24: The Mapped Right-of-Way

The 1999 EAW introduced the idea of an officially mapped right-of-way to guide Owatonna's future growth. However, this was only a conceptual map—it did not involve land acquisition or establish legal right-of-way, as repeatedly confirmed by County Engineer Paul Sponholtz.

Despite this, WSB applied the 1999 concept to today's footprint, misrepresenting its original scale and intent. This revision distorted the planned setbacks—originally designed to protect residents and travelers—and was used to justify the current alignment to federal agencies. In doing so, the original goal of minimizing impacts and ensuring safety was undermined.



Page 25: US Highway 14 - Owatonna Beltline Study (2004)

The 2004 U.S. Highway 14 – Owatonna Beltline Study, cited by WSB, recommended against using the previously mapped right-of-way. Instead, it proposed preserving both 34th and 44th Avenues, specifically identifying 34th Avenue (Alternative 5 today) as an ideal "internal collector"—the very function now assigned to the East Side Corridor. This is the only study to recommend an inner corridor; earlier reports focused solely on a "beltline".

Despite this, officials—including the County Engineer, Commissioners, City Council, and Administrator—continue to claim that "this is a new road with a new purpose," invalidating prior reports. Yet, these same studies appear to be the foundation of current recommendations.

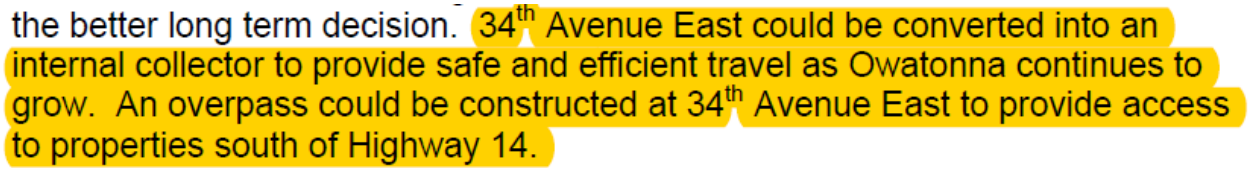
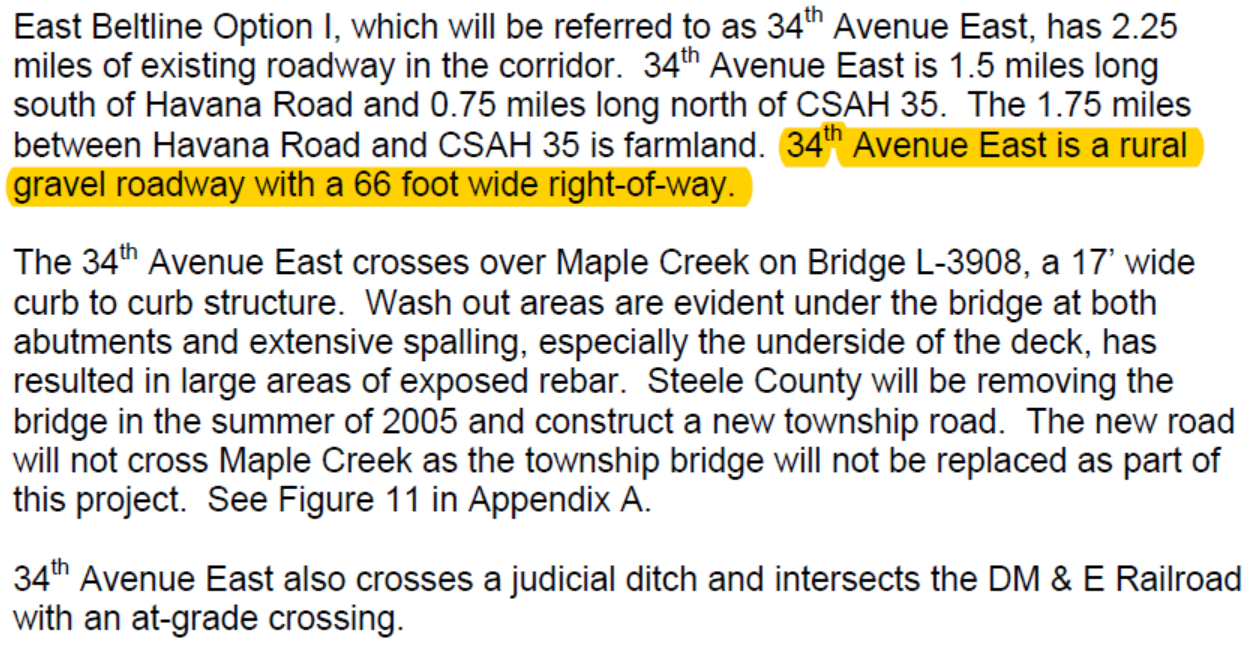

the better long term decision. 34th Avenue East could be converted into an internal collector to provide safe and efficient travel as Owatonna continues to grow. An overpass could be constructed at 34th Avenue East to provide access to properties south of Highway 14.

Figure R23 - *US Highway 14 - Owatonna Beltline Study (2004):* Recommendation for 34th Avenue to serve as an inner collector (Page 30, Recommendations).

The study also noted that 34th Avenue (Alternative 5 today) was an existing gravel road with a 66-foot right-of-way (Figure R24). A historical bridge once spanned Dane Road, but the bridge sustained significant damage and was removed around 2005, as noted in Steele County Board Meeting Minutes. After its removal, nearby farmer, Mark Rypka, tilled under the road—explaining its current absence. He publicly confirmed this during the May 31, 2023 open house. Historical records, including Figure R25, show the road existence as early as the 1930s, and Figure R24 confirms the presence of at-grade railroad crossing, reducing the need for additional crossings. Public support for using 34th Avenue (Alternative 5 today) dates back to at least 1993, as consistently documented in comments and prior studies.


East Beltline Option I, which will be referred to as 34th Avenue East, has 2.25 miles of existing roadway in the corridor. 34th Avenue East is 1.5 miles long south of Havana Road and 0.75 miles long north of CSAH 35. The 1.75 miles between Havana Road and CSAH 35 is farmland. 34th Avenue East is a rural gravel roadway with a 66 foot wide right-of-way.

The 34th Avenue East crosses over Maple Creek on Bridge L-3908, a 17' wide curb to curb structure. Wash out areas are evident under the bridge at both abutments and extensive spalling, especially the underside of the deck, has resulted in large areas of exposed rebar. Steele County will be removing the bridge in the summer of 2005 and construct a new township road. The new road will not cross Maple Creek as the township bridge will not be replaced as part of this project. See Figure 11 in Appendix A.

34th Avenue East also crosses a judicial ditch and intersects the DM & E Railroad with an at-grade crossing.

Figure R24 - US Highway 14 - Owatonna Beltline Study (2004) highlights the existence of a right-of-way along 34th Avenue (Alternative 5 today).

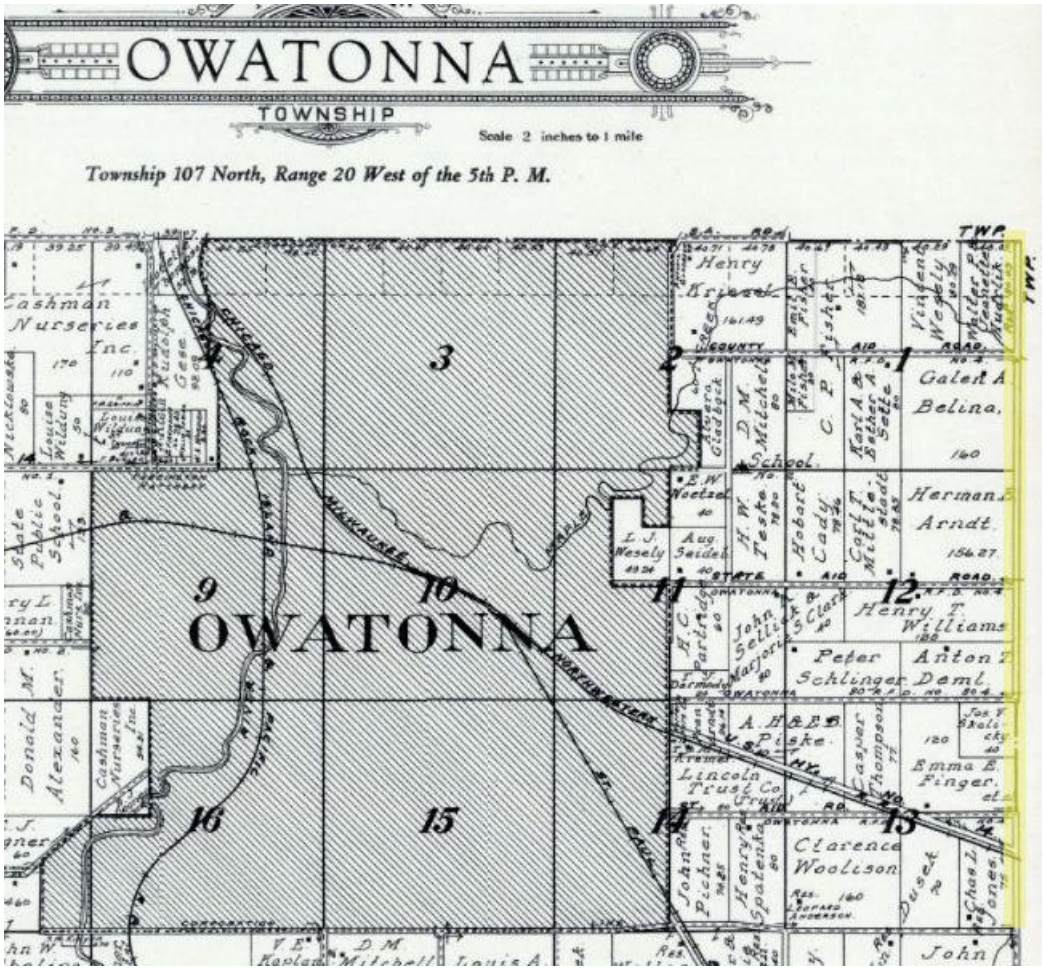


Figure R25 – *1937 Central Atlas Co.* plat of Owatonna Township showing 34th Avenue (Alternative 5).

Historical records, including a 1937 plat map, confirm that 34th Avenue (Alternative 5 today) existed long before it was tilled under. More importantly, Steele County is documented as owning 18 acres of the necessary right-of-way (Figure R26). This isn't just a mapped idea—it reflects actual land ownership. Unless the land was sold—an event for which no record exists in county archives—it is reasonable to conclude that Steele County still owns the corridor.

Although the 34th Avenue East option would require approximately 91 acres, approximately 18 acres are already owned by Steele County. An additional 73

Figure R26 - *US Highway 14 - Owatonna Beltline Study (2004):* Page 13 of the study documents Steele County's ownership of 18 acres along 34th Avenue (Alternative 5).

This 2004 study also emphasized maintaining sufficient setbacks to avoid the need for noise walls. In line with the 1995 report, subdivisions were planned with 800+ foot buffers to reduce noise impacts. In contrast, this current plan proposes a right-of-way just 100 feet wide—placing the road only 17 feet from homes in the North Country Subdivision. Despite this proximity, officials have told residents they do not plan to build a noise wall, even though it may be required.

Page 25: Future Transportation Plans

On March 9, 2004, the City of Owatonna and Steele County entered into a Joint Powers Agreement to preserve the mapped right-of-way. This agreement granted the first right of purchase or refusal and a six-month contention window should a permit be requested. However, six months after this agreement, the first house was built **ON** the mapped right-of-way without contention. The City and County failed to preserve this mapped right-of-way and now residents are being asked to bear the consequences.

Subsequent planning documents—the 2006 Owatonna Development Plan and 2005–2025 Steele County Transportation Plan—showed major shifts from the original mapped route (Figure R27). New roads like 34th and 44th Avenues were proposed, while the original corridor was shortened and buffered from the North Country Subdivision aligning more closely with Alternative 4 than Alternative 3. These updates reflect the abandonment of the original corridor concept and a shift toward lower-impact alternatives.

The Steele County 2005-2025 Transportation Plan even included a connection between Dane Road and Rose Street—designed *with* North Country in mind, as it was already platted. Residents reasonably relied on that plan when choosing to live there. It influenced both their decisions and the subdivision's layout—none of which contemplated a return to a long-abandoned corridor.

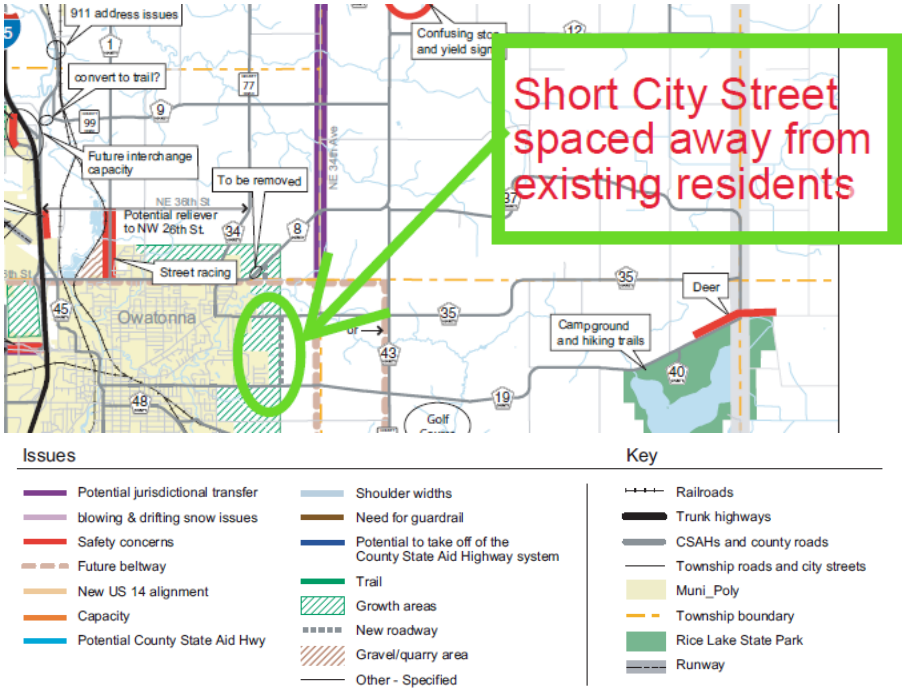


Figure R27 – The *2005–2025 Steele County Transportation Plan* illustrates planned growth between the North Country Subdivision, in its early stages of development, and a shorter proposed roadway.

Page 25: 2011 Beltline Study

The 2011 Beltline Study—completed by WSB—designated 44th Avenue as the preferred beltline route, later incorporated into the 2021 Highway 14 expansion. Yet, despite more than 30 years of planning, the beltline remains unfinished. Meanwhile, 34th Avenue (Alternative 5 today)—mapped as a 150-foot right-of-way and intended to serve as an inner collector—remains unobstructed. This stands in contrast to the previously mapped (29th Ave) corridor now being revived, which has long since been developed and compromised. WSB's current support for that route, despite their prior recommendation, raises serious concerns about the consistency and credibility of the planning process.

Page 28: Steele County 2040 Transportation Plan (2021)

Several issues in the Steele County 2040 Transportation Plan and related documents raise concerns about transparency and process integrity.

Memorandum Claim:
The community expressed support for County ownership of the new 29th Avenue during public meetings, listening sessions, open houses, and survey responses.

Concerns:
The Plan was adopted on July 13, 2021, but the first East Side Corridor open house wasn't held until July 21, 2022—over a year later. That open house had just two days' notice in the local paper and postcards arrived only days before. This timeline calls into question how "community input" was gathered for support of 29th Avenue prior to public engagement. In fact, residents have expressed concerns and opposition consistently since that first open house.

Memorandum:
The 29th Avenue project will reduce traffic on CSAH 45 and Mineral Springs Road and is supported by prior beltline and east-side corridor studies.

Concerns:
No studies have been presented to support this claim. The Memorandum itself was the first to share data and showed that only ~800 vehicles might be diverted from a single intersection—saving less than two seconds per trip. It also showed no traffic relief for CSAH 45. The claim of broader congestion relief is not substantiated.

New Development
The Memorandum notes new developments but omits critical details: both the North Country and Shady Hills subdivisions were built directly over the originally mapped right-of-way. Instead of initiating eminent domain, the Responsible Government Unit (RGU) narrowed the project area to 100 feet, leaving just 17 feet separating it from existing homes. This is a drastic departure from the 800-foot setback and 150-foot right-of-way originally recommended to minimize noise and visual impacts fails to provide the safe, cohesive travel experience that was initially planned (Figure R15).

Completely omitted from the Memorandum is the Joint Powers Agreement (https://www.owatonnaeastsidecorridor.com/downloads/05jointPowersagreement.pdf), signed on March 9, 2004, which aimed to preserve land for a future right-of-way. The agreement granted first right of refusal, first right of purchase, and a six-month contention window. Just six months later, the first home was built on that mapped right-of-way with no objection. Homes have continued to be constructed on this alignment without contention since (as seen in Figure R2)—reinforcing the abandonment of the corridor concept by both the city and county. No formal right-of-way or easement was ever recorded—only a conceptual alignment.

State and federal regulations require that projects avoid adverse impacts whenever feasible, followed by minimization and mitigation. The Memorandum itself acknowledges that Alternative 4 would offer the same benefits as Alternatives 2 and 3—making avoidance entirely feasible in this case. Yet, despite clear opportunity and regulatory guidance, the RGU has ignored this safer alternative. The safeguards that were designed to protect residents have been abandoned, and the consequences are now being unfairly shifted onto existing communities.

As noted in the Memorandum, The East Side Corridor will primarily serve future developments between the current boundary and 34th Avenue (Alternative 5), offering minimal benefit to existing neighborhoods. Alternative 4, which aligned with traffic needs and regulatory standards, was dismissed despite meeting stated goals. CSAH 45 and 48 traffic relief remains unproven.

Next Steps

"This ongoing study will also build on potential impacts identified in previous studies and consider efforts to avoid, minimize, and mitigate these impacts."

On October 14, 2024, residents asked whether avoidance would be included in the Environmental Assessment Worksheet (EAW). As of January 2, 2025, no answer has been given. The County Engineer had previously stated all regulations were being followed—but the earlier EAW had already recommended a route over 800 feet from homes. That should have been reflected in this Memorandum.

In November 2023, County Engineer Greg Ilkka admitted he didn't know homes had been built on the mapped right-of-way—despite residents raising the issue since July 2022. (See Figure R2.)

Residents have also offered compromise routes to reduce impacts. None have been considered. This lack of transparency and participation continues to erode public trust in the process.

Conclusion: Selective History Used to Justify a Preselected Route

Chapter 1 illustrates how selective historical interpretation has been used not to inform the best solution—but to validate a predetermined outcome. Rather than building on the full context of decades of planning, previous studies, and public feedback, this process has cherry-picked facts that support a specific route while ignoring key findings that emphasized avoidance, safety, and long-term cost savings.

The original intent of the mapped right-of-way, the 800-foot setbacks to prevent noise and visual impacts, and repeated recommendations for inner collectors like 34th Avenue (Alternative 5) have all been downplayed or omitted. Meanwhile, today's planning documents present a distorted narrative—one where current development patterns appear to have guided the process from the start, even when those developments conflict with previous plans.

This selective use of history paints an incomplete and misleading picture, one designed to rationalize building within 17 feet of existing homes instead of organically identifying the most balanced and responsible alternative. If the goal is truly to develop the most cost-effective, least harmful, and community-centered solution, the process must embrace the full scope of historical data and resident concerns—not rewrite them to justify an already-made decision.

Chapter 2: Traffic Studies and New Information

The second chapter of the Memorandum focuses heavily on travel time, trip length, and congestion relief to justify the preferred alternative. However, the data used to support these conclusions is riddled with inaccuracies, biased assumptions, and questionable calculations—many of which contradict basic math or exclude more favorable alternatives. These errors raise serious concerns about whether this analysis was designed to explore all viable routes fairly, or merely to validate a predetermined outcome.

Page 34: Appendix C: Connectivity and Travel Times

Emerging Inaccuracies and Misleading Assumptions

Several issues undermine the credibility of the travel time data used to justify the preferred route:

- **Four of six modeled routes use incorrect distances**, which directly skews travel time calculations. While travel time can vary, distance is a fixed metric and should not be misrepresented.

Motor Vehicle Trip Length/Distance (in miles) and Travel Time (in minutes) between Origins and Destination)

		Destinations		
Existing	Origins	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
	26th St NE & Kenyon Rd	10 min/4.5 mi	10 min/3.9 mi	not served by any ESC alternative
	Country View Ave & Fox Hollow Ln	7 min/3.5 mi	10 min/3.7 mi	11 min/4.9 mi

- Actual measurements show:
  - 26th St. to Hy-Vee: 4.1miles, 11minutes
  - Countryview & Fox Hollow Ln to Owatonna High School: 3.7miles, 8 minutes
  - Countryview & Fox Hollow Ln to Hy-Vee: 3.9miles, 11 minutes
  - Countryview & Fox Hollow Ln to the hospital: 5.1mi, 12 minutes

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

Figure R28 – Accurate times and distances based on google from WSB designated points

- At the May 30, 2023 open house, WSB representative Jack Corkle dismissed resident concerns that the East Side Corridor would not improve travel times, stating that such concerns were merely "opinions" and that tools like Google Maps were not reliable for calculating accurate distances or times. Ironically, the travel times and distances presented in the Memorandum are based on Google Maps data—the very tool residents were told was insufficient.

These discrepancies call into question the accuracy of the data submitted to government agencies in support of the East Side Corridor.

When accurate distances and times are used a different picture emerges

When proper distances are applied, the perceived advantage of Alternative 3 nearly disappears. In fact, the time difference between Alternatives 3 and 4 is reduced to mere seconds on the one route—and even then, that route primarily benefits those who are now asking for the road to be moved farther from their homes. Most North Country residents will likely continue using their existing routes to reach destinations like Hy-Vee, regardless of which alternative is selected.

Residental Analysis of Connectivity Data for Alts 3 and 4

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi
	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi	14 min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi	10 min/4.2 mi	10 min/5.4 mi
	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi	14 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi	11 min/4.6 mi	11 min/6.0 mi
	faster than existing			
	similar/shorter distance			
	slower than existing			

Figure R29 – Connectivity Comparison data for Alternatives 3 and 4 with accurate distances and time.
(Note: assuming Alternative distances and times are accurate for this comparison)

Based on accurate distances:

- **Alternative 3**: 2 routes are faster, 2 are similar, 1 is longer.
- **Alternative 4**: 2 routes are faster, 1 is similar, 2 are longer.

Compare this to WSB's claims:

- **Alternative 3**: 1 route faster, 3 similar, 1 longer.
- **Alternative 4**: 1 similar, 4 longer.

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi	14 min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi	10 min/4.2 mi	10 min/5.4 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi	14 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi	11 min/4.6 mi	11 min/6.0 mi

Even WSB's own data is inconsistently applied. For example, the route from 26th St & Kenyon Avenue to the high school shows a 10-minute travel time for both Alternatives 3 and 4. Yet Alternative 3 is highlighted yellow (labeled "similar/shorter distance"), while Alternative 4 is highlighted red (labeled "slower than existing").

This selective framing creates the illusion of a more significant difference between the alternatives than actually exists.

	Origin	Owatonna High School/US 14 & US 218 Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8 mi
	Country View Ave & Fox Hollow Ln	7 min/2.6 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area
4	26th St NE & Kenyon Rd	10 min/5.1 mi
	Country View Ave & Fox Hollow Ln	7 min/3.1 mi

Corrected Distances Reveal Key Misrepresentations

- Alternatives 3 and 4 perform more similarly than reported, with both offering two faster routes, not just one.
- Neither alternative significantly improves access to Hy-Vee, rendering that metric largely irrelevant.
  Alternative 4 presents fewer residential impacts, making it the more responsible and community-focused choice.

Real-World Travel Patterns Overlooked

WSB and Steele County assert that the East Side Corridor is needed to reduce traffic through downtown. However, no surveys were conducted to determine whether the intended users—such as residents of North Country—actually use downtown routes or alternative paths.

In contrast, residents conducted a small informal poll that revealed the majority of North Country residents already avoid downtown—even if it means taking less direct routes—in order to bypass congestion. This behavioral insight was overlooked by both WSB and the County Engineer.

The following exhibits compare:

- Google's recommended routes, including distances and travel times, and
- The routes residents actually use, which often prove faster in real-world conditions than Google's estimates.

For example, the route from Countryview & Fox Hollow to the hospital typically takes just 9 minutes via Greenhaven Lane, a path not reflected in the project's analysis.

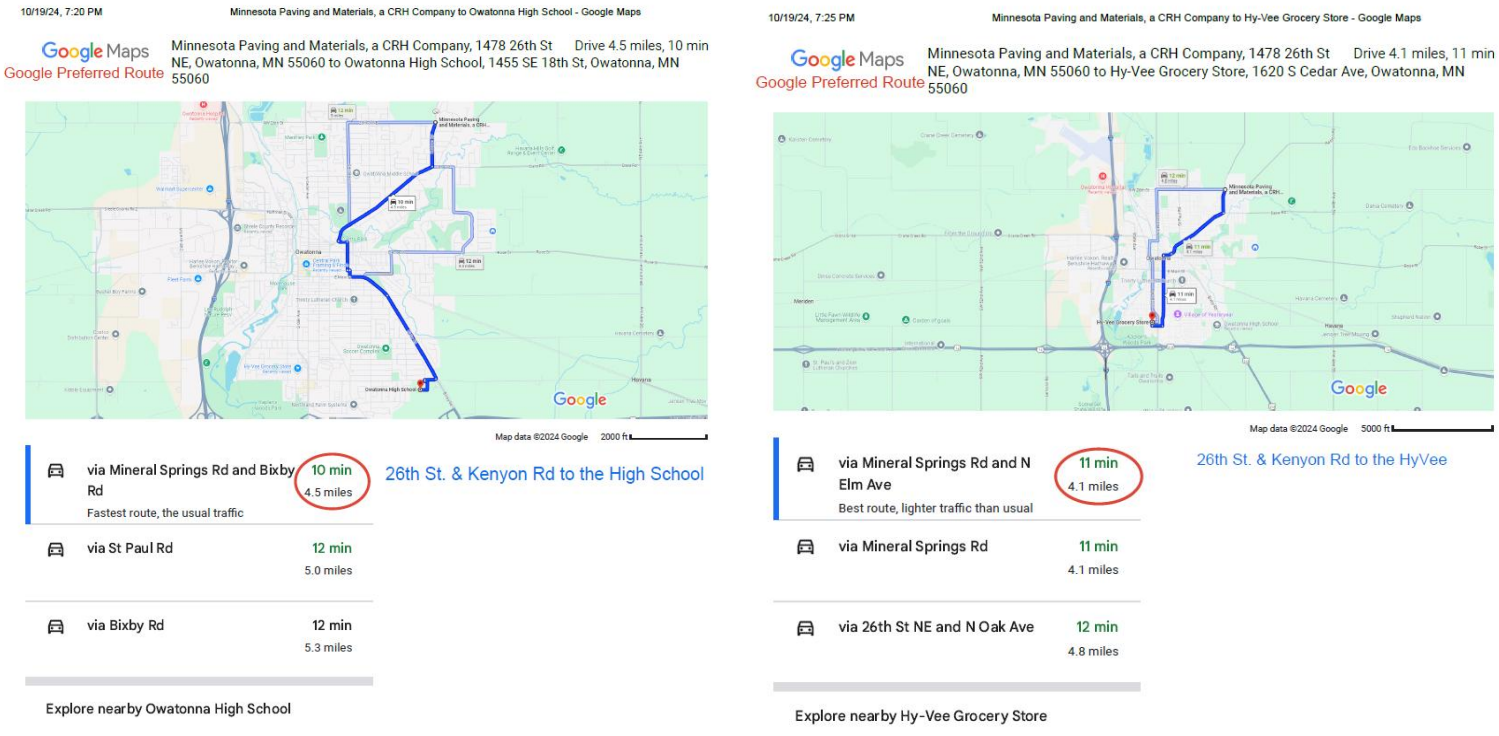


Figure R30 – 26th St. & Kenyon Rd to destination points

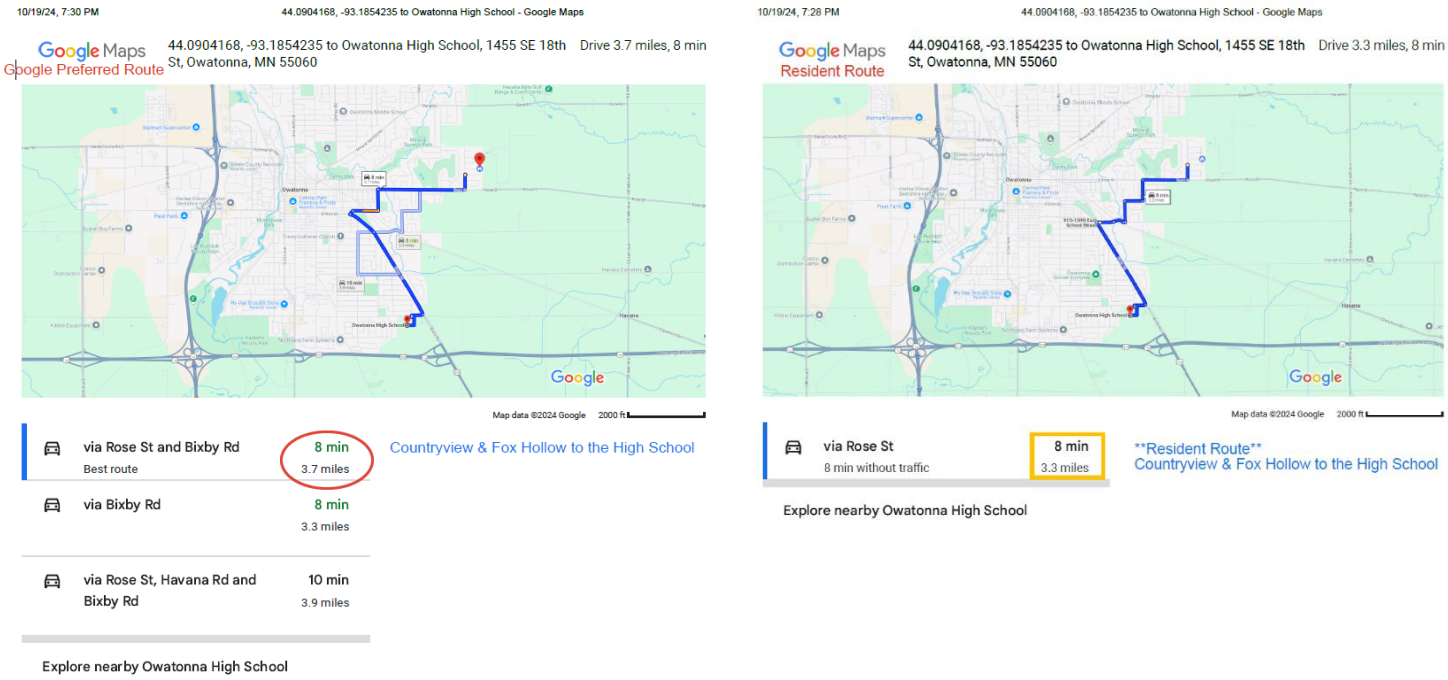


Figure R31 – Countryview & Fox Hollow Ln to the High School Google Recommended Route (left) 3.7 miles and Resident Preferred Route (right) 3.3 miles. Both 8 minutes travel time.

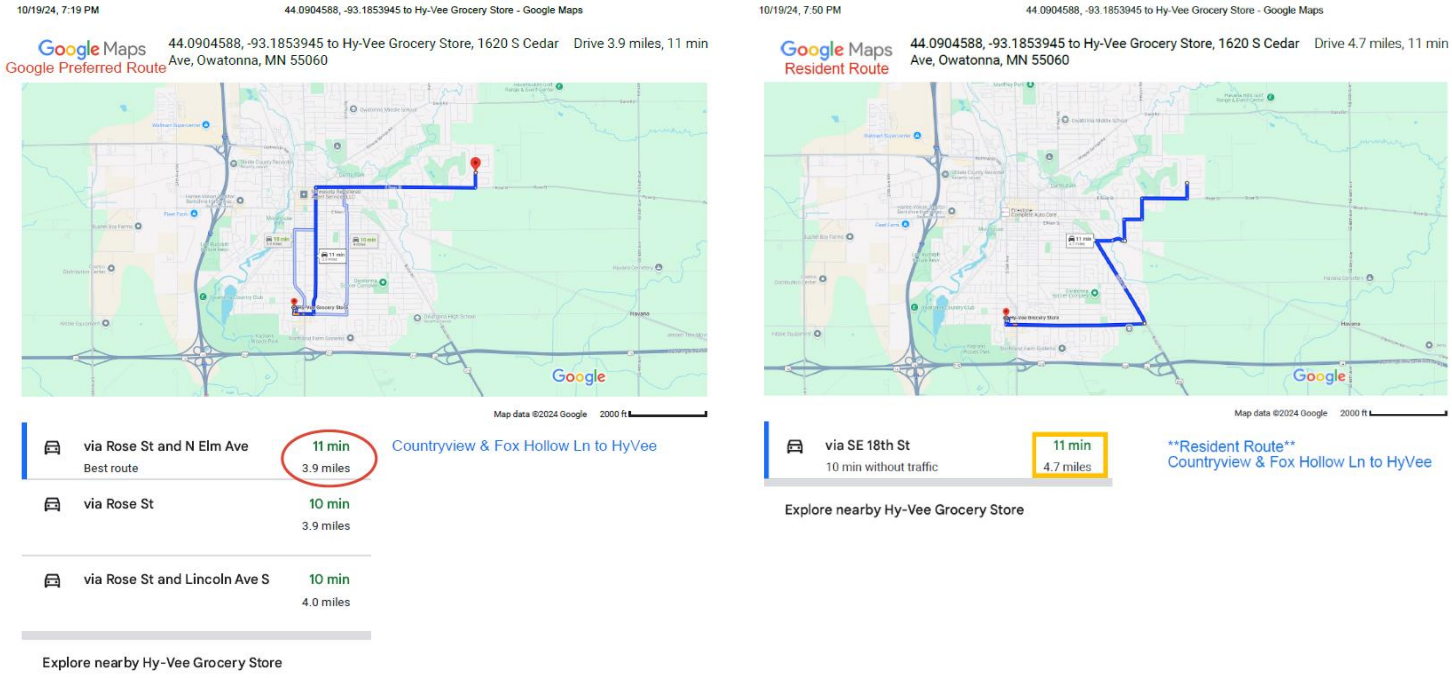


Figure R32 – Countryview & Fox Hollow Ln to Hy-Vee Google Recommended Route (left) 3.9 miles and Resident Preferred Route (right) 4.7 miles. Both 11 minutes travel time.

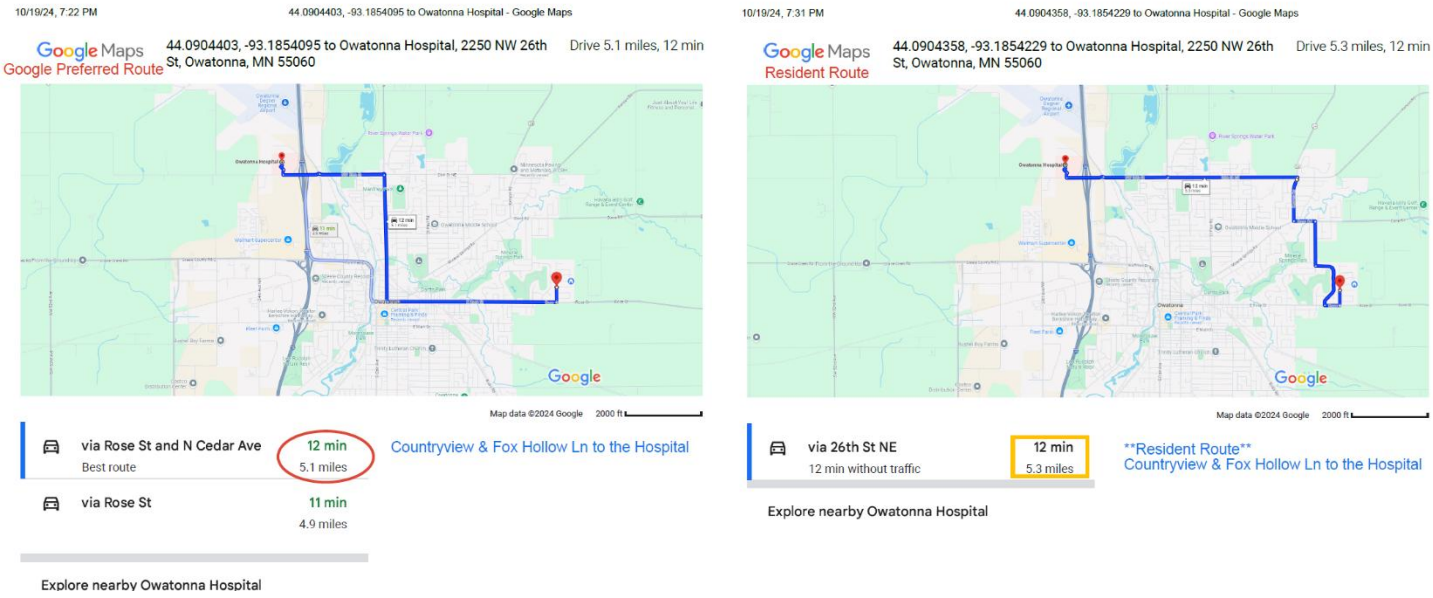


Figure R33 – Countryview & Fox Hollow Ln to the Hospital Google Recommended Route (left) 5.1 miles and Resident Preferred Route (right) 5.3 miles. Both 12 minutes travel time (although resident route is often faster).

The Memorandum fails to acknowledge that many residents already avoid downtown and are not contributing to traffic counts along the targeted routes. In fact, residents often choose longer routes, demonstrating a willingness to drive farther for only minor benefits—undermining the need for the proposed alignment. This makes the continued preference for Alternative 3 over Alternative 4—despite similar travel times and far greater residential impacts—appear less like an objective conclusion and more like an effort to justify a predetermined outcome.

Page 36: Traffic Analysis Memorandum

This analysis evaluates:

- Trip length and travel time between origins and destinations
- Downtown congestion impacts

However, it relies on the same inaccurate times and distances highlighted in the previous section. Notably, the chart on this page introduces an additional data set not found elsewhere in the Memorandum.

6	26th St NE and Cedar Ave	New Owatonna Senior High School	10	4.1	Cedar Ave, Rose St, Grove Ave, Main St, Bixby Rd, SE 18th St

That dataset—originally studied—was removed from final comparisons, because it showed no benefit from the East Side Corridor. If this route had genuinely offered improvements, the data would have reflected that. Instead, removing it appears to skew the analysis toward a predetermined outcome, rather than allowing the data to speak for itself.

Page 37: Calculations

While it's reasonable to use Google Maps for estimating travel times along existing routes, it is troubling that WSB both relied on and manipulated this data inconsistently. Distance—unlike time—is a fixed variable. Any deviation in distance between two known points signals an error or manipulation.

> The general method of estimating travel time and distance was to use Google Maps where possible for alternatives that follow existing roadways. Estimates for new alignments were determined by adding or subtracting time and distance from the Google Maps measurements. Travel time on new alignments was assumed to be one minute per mile in rural areas and two minutes per mile in developed areas. Although Alternative 6 has been dismissed from further consideration, it is shown in the tables in this section because it follows the existing SE 44th Avenue alignment and thus serves as the basis for many of the travel time and length estimates.

As professionals in this field, engineers are expected to apply fundamental mathematical principles—not manually add or subtract times from Google Maps or rely on broad assumptions. The formula is straightforward:

Time = Distance ÷ Speed

For example, the distance from 26th St. to 18th St. (3 miles), from Kenyon Rd. to Alternative 4 (1 mile), and then from Alternative 4 to the High School (1.25 miles) adds up to 5.25 miles. At 55 mph for 5 miles and 30 mph for the final 0.25 miles, the travel time is:

- **(5 ÷ 55 + 0.25 ÷ 30) × 60 = approximately 6 minutes (5:57)**

Yet, the Memorandum lists Alternative 4 from 26th St. & Kenyon Rd to the High School as taking 10 minutes**.** Even factoring in multiple stop signs (adding an exaggerated 30 seconds each), this route would still take no more than 8 minutes. These mathematical discrepancies raise serious questions about how travel times were calculated—and why they differ so drastically from basic math.

Compounding this issue is WSB's own contradiction. At the May 30, 2023 open house, representatives told residents that Google Maps was not a reliable tool for measuring travel times. Yet that same tool appears to be the foundation for their own data—and selectively modified to suit the outcome.

Similarly, the Alternative 5 (34th Avenue) route is 6.06 miles, which at 55 mph would take less than 7 minutes (6:36), yet the Memorandum claims it takes 11 minutes. These exaggerated time differences were used to disqualify Alternatives 4 and 5—an outcome that appears unsupported by real data.

Inaccurate and inconsistent calculations suggest these conclusions were not based on objective analysis, but rather tailored to disqualify specific alternatives. For a project of this magnitude, there is no justification for using hand-modified Google data and vague time assumptions like "1 minute per mile" in place of standard mathematical models or engineering software.

The differences aren't just minor—they're astounding, and they call into question the integrity of the decision-making process itself.

When standard mathematical formulas are correctly applied—even accounting for generous 30-second stops—a very different picture emerges. Alternative 3 offers no significant improvement over current routes, while Alternative 4 proves to be the fastest overall, with all routes showing time savings. Alternative 5 is only a few seconds slower on one route. (See Figure R34)

Residental Analysis of Alternatives Using Matememathical Formulas + Stops

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
Existing	26th St NE & Kenyon Rd	10 min/4.5 mi	11 min/4.1 mi	
	Country View Ave & Fox Hollow Ln	8 min/3.3 mi	10 min/3.9 mi	12 min/5.1 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
3	26th St NE & Kenyon Rd	10 min/4.8	13min/6.3 mi	
	Country View Ave & Fox Hollow Ln	7min/2.8 mi	10 min/4.3 mi	9 min/5.7 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
4	26th St NE & Kenyon Rd	8 min/5.1 mi	11 min/6.6 mi	
	Country View Ave & Fox Hollow Ln	6 min/3.3 mi	9 min/4.8 mi	10 min/6.0 mi

	Origin	Owatonna High School/US 14 & US 218 Interchange Area	Cedar Ave & 18th St Commercial Area (Hyvee)	Owatonna Hospital/I-35 & 26th St Interchange Area
5	26th St NE & Kenyon Rd	9 min/6.1 mi	12 min/7.6 mi	
	Country View Ave & Fox Hollow Ln	7 min/4.3 mi	10 min/5.8 mi	11 min/7.0 mi

faster than existing
similar/shorter distance
slower than existing

**Alternative 3 in it's proximity to homes will cause a slower roadway - assumed a 40mph travel speed.
**Factored in 30 seconds for each of 4 stops on each route. Most stops do not take 30 seconds.

Figure R34 – Estimated Travel Times for Alternatives 3–5 Using Standard Time Formula with 30-Second Stop Delays Included.

How did WSB's "assumed" travel times for Alternatives 4 and 5 diverge so significantly from the travel times produced using standard distance-speed calculations? This discrepancy raises serious concerns about the validity of the assumptions used in the analysis. If basic formulas—combined with reasonable delays—demonstrate shorter or comparable travel times, then WSB's assumptions appear to have artificially disadvantaged Alternatives 4 and 5, leading to their premature dismissal.

Page 38-44: Justifications

These pages attempt to justify travel time differences between alternatives. However, the analysis did not use actual calculated times or consider current travel behaviors of residents—calling the validity of these comparisons into question. Even using inaccurate data, the Memorandum acknowledges that Alternatives 2 through 4 offer similar benefits. So why was Alternative 4 removed from consideration? Had proper calculations been applied, Alternative 5 likely would have remained viable as well. The pattern suggests bias in favor of a predetermined outcome rather than a fair evaluation of all options.

Page 45: Trip Time Summary

Tables 8 and 9 rely on travel times and distances derived from methods previously shown to be inconsistent and unreliable. Given the questionable techniques used—such as adding and subtracting from Google Maps without proper calculations—these summaries should not be considered accurate or dependable until travel times are recalculated using standard methodologies.

Page 45: Downtown congestion impacts

This section fails to reflect the actual travel patterns of residents. Due to downtown traffic delays and poorly synchronized lights, many residents already avoid this area—opting for longer but faster-moving alternative routes. These routes, shown in Figures R31–R33, were not studied or acknowledged.

Additionally, while the report claims future growth may increase downtown congestion, it overlooks a key fact: there is no east-west connector that bypasses downtown. The East Side Corridor, being a north-south route, does not solve this core issue. For example, travel from NE Owatonna to the Hy-Vee area remains unaffected, making such data points irrelevant to the East Side Corridor's justification.

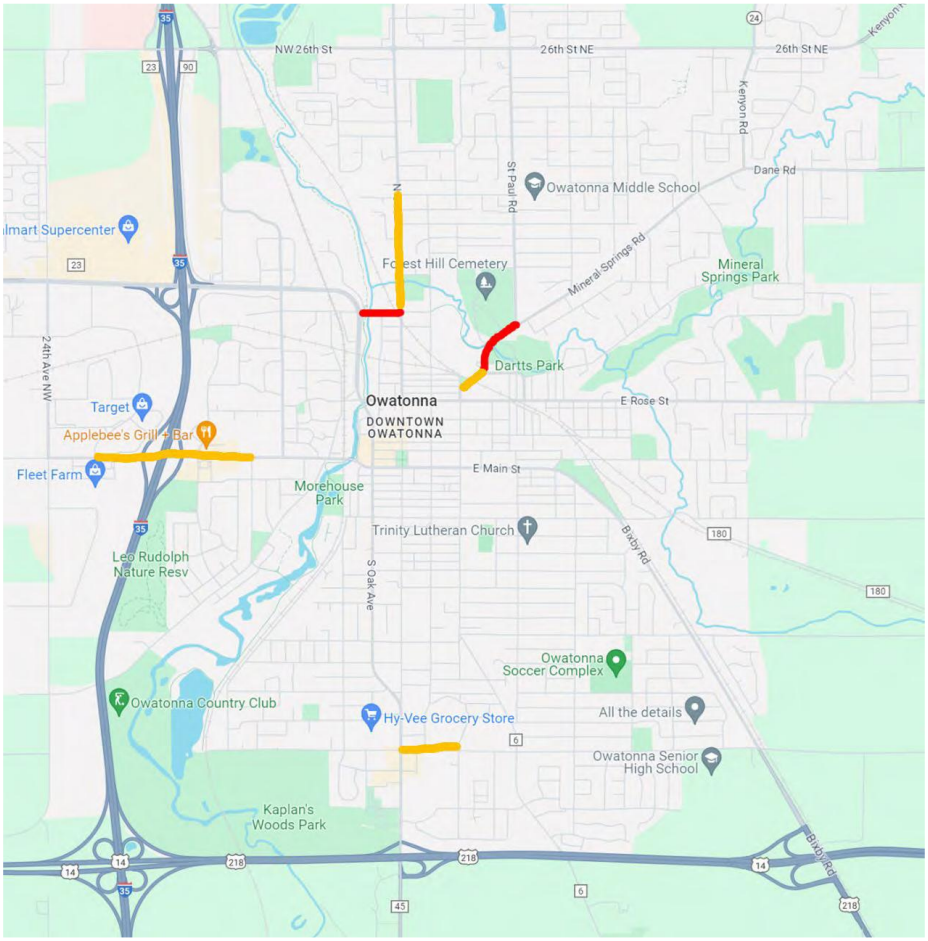
As Owatonna was designed with a spoke-and-wheel road system meant to draw people into the downtown core, the report also fails to address potential economic and logistical consequences of diverting traffic away from downtown—the very heart of the city.

Page 46: Roads Approaching Capacity

Figure 8 claims that certain roads are nearing or at capacity, yet no accompanying studies or data are provided to support this assertion. According to the Memorandum, the East Side Corridor may alleviate traffic at two locations—but these are essentially the same spot, just feet apart on Mineral Springs Road, with a reported net savings of only two seconds.

More critically, this plan redirects traffic toward the already problematic intersection at 18th Street and Oak Avenue, a location long recognized for safety concerns. In effect, the proposal simply shifts the problem rather than solving it, acting as a temporary band-aid for congestion on Mineral Springs Road.

As Owatonna continues to grow, Mineral Springs Road will likely remain a primary east-west connector regardless. This raises the question: does the East Side Corridor actually solve a problem, or just relocate it?



That's not to say a corridor on the east side of town isn't necessary or unjustified—but using downtown traffic relief as the primary rationale is not a sound or measurable justification. The most significant benefit of this project is clearly tied to future development. If growth is the goal, then infrastructure must come first—but that requires transparency. Plans for future growth should be shared openly, yet so far, that data has been withheld from this project.

Page 47: Roads Approaching Capacity Continued

Table 10 in this report, shown below, is based on projected 2040 traffic data taken from the Steele County 2040 Transportation Plan. However, the 2040 Plan was developed and adopted *after* East Side Corridor studies were already underway and residents had been referencing data from the then-current 2025 Plan. The timing of the 2040 Plan's release raises legitimate concerns about whether it was produced, at least in part, to help justify the East Side Corridor—rather than serving as an objective, forward-looking planning document.

Table 10. Roadways approaching or exceeding capacity per the Steele County 2040 Transportation Plan.

Roadway	From	To	2040 AADT	Capacity	V/C
Bridge St	Park Dr NW	Selby Ave	20,500	22,000	0.93
18th St SW	CR 45	Hartle Ave	9,500	10,000	0.95
North St	CR 45	Cedar Ave	11,300	10,000	1.13
Cedar Ave	North St	16th St NE	9,200	10,000	0.92
Mineral Springs Rd	Fremont St	Cherry St	9,300	10,000	0.93
Mineral Springs Rd	Cherry St	St Paul Rd	10,100	10,000	1.01

In comparing data from MnDOT's Traffic Mapping Application (https://www.dot.state.mn.us/traffic/data/tma.html), as referenced in this section, traffic volumes have decreased by 8–20% on all but one of the identified "congested" roadways between 2019 and 2024. This trend raises important questions about whether congestion is currently a legitimate concern warranting such significant infrastructure investment.

Roadway	From	To	2019 AADT	2024 AADT	2040 AADT	Capacity	Current V/C	Capacity Change
Bridge St	Park Dr NW	Selby Ave	15400	11,123	20,500	22,000	0.51	-19.4%
18 St SW	CR 45	Hartle Ave	6200	6,550	9,500	10,000	0.66	3.5%
North St	CR 45	Cedar Ave	8900	6,959	11,300	10,000	0.70	-19.4%
Cedar Ave	North St	16 St NE	7200	5,521	9,200	10,000	0.55	-16.8%
Mineral Springs Rd	Freemont St	Cherry St	7900	7,025	9,300	10,000	0.70	-8.8%
Mineral Springs Rd	Cherry St	St. Paul Rd	9300	7,825	10,100	10,000	0.78	-14.8%
			**There was no 2019 data, next most recent 2011 data used					

Figure R35 – Current and Historical AADT: Traffic volumes in Owatonna have shown a downward trend over time.

The only roadway that saw an increase—just 3.5%—was 18th Street, the same corridor this report acknowledges will see added traffic under the East Side Corridor plan. While the 2040 AADT projections suggest this segment may near capacity, reaching those levels would require a traffic increase of over 30%, which is a significant and currently unsupported growth assumption.

Inflated Diversion Estimates and Questionable Assumptions

This report claims that a maximum of 3,800 vehicles could be diverted by the East Side Corridor—1,500 from Bigelow Avenue and 2,300 from Mineral Springs Road. However, this total is misleading. Bigelow intersects Mineral Springs Road, and with only 12 homes on this segment of Bigelow, it's logical that many of the 1,500 vehicles also travel on Mineral Springs. Therefore, combining both figures inflates the number and risks double-counting traffic. The actual number of unique trips that could be diverted should not be assumed to be more than 2300 possible vehicles.

Compounding this issue, the report assumes—without supporting evidence—that 50% of these trips would benefit from the East Side Corridor. Whether that number is accurate or inflated is unclear, as no origin-destination data or survey results were presented.

However, actual calculations tell a different story. Traveling from Bigelow and Mineral Springs Road to the high school via Alternative 5 covers 6.3 miles—0.8 miles at 30 mph and 5.5 miles at 55 mph—yielding a total travel time of approximately 7.5 minutes. The current route is 3.5 miles and takes 8 minutes per Google Maps. Even though Alternative 5 saves 30 seconds, it adds significantly more distance—a tradeoff many drivers are unlikely to make.

Alternative 3 offers a similar 8-minute travel time over 5 miles, assuming an average speed of 40 mph. Again, for no significant time savings and a 71% increase in distance, drivers may simply continue using current routes.

Bigelow & Mineral Springs Rd to High School

Route	Time	Distance
Current:	8 minutes	3.5 miles
Alternative 3 (29th Ave):	8 minutes	5 miles
Alternative 4 (New Route):	6.5 minutes	5.3 miles
Alternative 5 (34th Ave):	7.5 minutes	6.3 miles

Figure R36 – Travel Times Based on Distances and Speed Calculations

Additionally, this area would not benefit from the East Side Corridor for most key destinations. For instance, Hy-Vee is already just 7 minutes away. Even if the East Side Corridor reduced travel time to the high school to 6 minutes, Hy-Vee—located 1.6 miles farther west—would still take at least 10 minutes. Current alternatives to the hospital are also faster. It's unlikely that anyone would choose to drive east just to go west again.

In reality, the only potential benefit of the East Side Corridor for these residents might be travel to the high school—but even that is questionable. While OHS serves approximately 1,500 students, it is highly unlikely that more than half of the 1,500–2,300 vehicles recorded at this intersection are headed there. A more plausible explanation is that much of this traffic is traveling to and from the nearby elementary and middle schools, which serve over 2,000 students just a few blocks away, that would not significantly benefit from the East Side Corridor.

Given the flawed assumptions and lack of supporting data, even the claim that 800 vehicles would benefit is speculative at best. And even if that number were accurate, the projected benefit amounts to a cumulative savings of just two seconds per vehicle. Recent decreases in traffic volumes may already offer similar relief, at no cost, further undermining the justification for the project.

Chapter 2 Summary: Traffic Data Manipulation Reveals Biased Outcome

Chapter 2 critically examines the traffic data and connectivity analysis used to support the East Side Corridor project. It reveals that WSB and Steele County relied on questionable assumptions, inconsistent travel time estimates, and manipulated Google Maps data rather than using standard, transparent calculations. Multiple travel routes contain inaccurate distance measurements, and fundamental mathematical formulas were overlooked—despite being essential to traffic modeling.

Additionally, the report fails to account for real-world resident behavior, such as the common practice of avoiding downtown congestion by taking alternative routes. It also overstates potential benefits, such as time savings and diverted traffic volumes, without sufficient evidence or clarity on how those figures were derived. In some cases, traffic appears to have been double-counted, and unsupported assumptions—like 50% of drivers benefiting from the East Side Corridor—are presented as fact.

What is clear is that recent traffic trends show a decrease in congestion, and standard travel time formulas demonstrate that Alternatives 4 and 5 are faster than Alternative 3. Yet, despite their advantages, Alternatives 4 and 5 were dismissed prematurely.

By using imprecise assumptions and manipulated Google Maps estimates rather than accurate calculations, this report presents skewed data—raising legitimate concerns that the analysis was designed to justify a predetermined Preferred Alternative rather than objectively identifying the most effective, lowest-impact solution.

Chapter 3: Cost Analysis

This chapter highlights how cost estimates were selectively presented to support Alternative 3. Alternatives 4 and 5, which may offer fewer impacts and cost-saving advantages, were excluded from detailed analysis. Key expenses—like noise walls and urban roadway—inflate Alternative 3's cost, while lower-impact options were dismissed without full comparison.

Page 61: East Side Corridor Alternative Cost Estimates

Given the prohibitive cost of home condemnations, Alternatives 1A, 1B, 1C, and 2 were never truly feasible. Alternatives 4 and 5 were dismissed due to alleged travel time disadvantages—even though the Memorandum repeatedly asserts that Alternatives 2–4 offer comparable performance. This analysis has mathematically disproven the claims of longer travel times. As a result, cost breakdowns for Alternatives 4 and 5 were not included. However, using Attachment K, we can draw meaningful inferences about their potential costs and benefits.

Cost Estimates*

Item	Unit	Unit Cost	Option 1A		Option 1B		Option 1C		Option 2		Option 3	
			Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway (urban)	Mile	$ 3,600,000.00	2	$ 7,200,000.00	2.6	$ 9,360,000.00	2.6	$ 9,360,000.00	2	$ 7,200,000.00	2	$ 7,200,000.00
Roadway (rural)	Mile	$ 2,500,000.00	3.02	$ 7,550,000.00	2.83	$ 7,075,000.00	2.93	$ 7,325,000.00	3.29	$ 8,225,000.00	3.55	$ 8,875,000.00
Railroad Crossing	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00
Bridge	Each	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00
Box Culvert	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	3	$ 1,500,000.00	2	$ 1,000,000.00
Sound Wall	Lin Ft	$ 620.00	8000	$ 4,960,000.00	15700	$ 9,734,000.00	14900	$ 9,238,000.00	3300	$ 2,046,000.00	3700	$ 2,294,000.00
Building Removal	Each	$ 30,000.00	36	$ 1,080,000.00	38	$ 1,140,000.00	50	$ 1,500,000.00	10	$ 300,000.00		$ -
Total Take (Relocation)	Each	$ 250,000.00	36	$ 9,000,000.00	38	$ 9,500,000.00	50	$ 12,500,000.00	10	$ 2,500,000.00		$ -
RW (Perm) (Residential)	Sq Ft	$ 3.00	775,556	$ 2,326,668.00	756,191	$ 2,268,573.00	665,090	$ 1,995,270.00	794,362	$ 2,383,086.00		$ -
RW (Perm) (Rural)	Sq Ft	$ 0.75	775,556	$ 581,667.00	756,191	$ 567,143.25	665,090	$ 498,817.50	794,362	$ 595,771.50	1,983,451	$ 1,487,588.25
RW (Temp) (Residential)	Sq Ft	$ 1.00	267,827	$ 267,827.00	305,735	$ 305,735.00	254,666	$ 254,666.00	261,828	$ 261,828.00		$ -
RW (Temp) (Rural)	Sq Ft	$ 0.25	267,827	$ 66,956.75	305,735	$ 76,433.75	254,666	$ 63,666.50	261,828	$ 65,457.00	743,287	$ 185,821.75
		Total Cost		**$ 38,033,118.75**		**$ 45,026,885.00**		**$ 47,735,420.00**		**$ 29,577,142.50**		**$ 25,542,410.00**

*This is a high level budgetary comparison between alternatives and is not meant to reflect actual project costs. Variability and contingency are built into the estimate.

According to the current analysis, Alternative 3 includes 2 miles of urban roadway and 3.55 miles of rural roadway, totaling 5.55 miles. However, in its expanded form, the alignment only measures 4.6 miles. This discrepancy raises questions—where is the additional mile accounted for?

Due to its proximity to existing homes, Alternative 3 would create significant noise impacts, necessitating a $2.3 million noise wall. In contrast, Alternatives 4 and 5 are located farther east, away from noise-sensitive areas, and would not require such mitigation as they effectively avoid residential impacts. Urban roadway was incorporated into Alternative 3 to comply with MnDOT's speed requirements, yet rural roadway is substantially more cost-effective.

Residents previously informed officials of a federal regulation that allows the purchase of land for avoidance, funded in the same way as noise mitigation. That opportunity was ignored. Now that federal funding has been withdrawn, the full cost of the $2.3 million (or more as a stand-alone noise wall) noise wall will fall on Steele County taxpayers. This represents a missed opportunity for both cost savings and impact avoidance—an outcome that could have been prevented with better engagement and responsiveness to public input.

See Figure R37 for a comparison of known cost-related elements. Although Alternatives 4 and 5 would require longer roadways due to their locations farther east, Alternative 5 already includes 66 feet of owned right-of-way—a significant cost offset. Much of the route also follows an existing roadbed, reducing both construction costs and farmland disruption. It includes an existing railroad crossing, avoiding the need to create a new one and closing Havana Road, preserving east-west connectivity. Furthermore, Alternative 5 has already been mapped as a 150-foot right-of-way corridor and crosses Maple Creek at a previously established crossing protecting natural resources. 34th Avenue prevents floodplain encroachment, reducing the need for costly flood mitigations and allowing for shorter bridge span.

Item	Unit	Unit Cost	Alternative 3		Alternative 4		Alternative 5	
			Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway (urban)	Mile	$3,600,000.00	2	$7,200,000.00	0	-	0	-
Roadway (rural)	Mile	$2,500,000.00	3.55	$8,875,000.00	5	$12,500,000.00	5.54	$13,850,000.00
Railroad Crossing	Each	$500,000.00	1	$500,000.00	1	$500,000.00	0.5	$250,000.00
Bridge	Each	$4,000,000.00	1	$4,000,000.00	1	$4,000,000.00	1	$4,000,000.00
Box Culvert	Each	$500,000.00	2	$1,000,000.00	2	$1,000,000.00	2	$1,000,000.00
Sound Wall	Lin Ft	$620.00	3700	$2,294,000.00	0	$0.00	0	$0.00
Building Removal	Each	$30,000.00		-		-		-
Total Take (Relocation)	Each	$250,000.00		-		-		-
RW (Perm) (Residential)	Sq Ft	$3.00		-		-		-
RW (Perm) (Rural)	Sq Ft	$0.75	1983451	$1,487,588.25	2,373,451	$1,780,088.25	1,329,133	$996,849.42
RW (Temp) (Residential)	Sq Ft	$1.00		-		$0.00		$0.00
RW (Temp) (Rural)	Sq Ft	$0.25	743287	$185,821.75	743287	$185,821.75	743287	$185,821.75
		Total Cost:		**$25,542,410.00**		**$19,965,910.00**		**$20,282,671.17**

R37 – Cost analysis break down if Alternatives 4 and 5 had been included. Since Alternative 5 is an already existing roadway, there is a road bed that could be used as a basis for a new roadway reducing the "Roadway (Rural)" cost.

Both Alternatives 4 and 5 are more cost-effective and faster than Alternative 3. The estimated cost difference between the two is approximately $300,000. However, when factoring in potential savings from existing mapping and infrastructure, Alternative 5 may ultimately be less expensive. In contrast, Alternative 4 would impact more farmland due to the absence of previously acquired right-of-way.

Of all the options, 34th Avenue (Alternative 5) provides the greatest long-term flexibility, the fewest disruptions to residents and agriculture, and significant cost advantages. It is also the route local residents have consistently supported for more than 30 years.

Chapter 4: Conclusion

Conclusion

In summary, the inconsistencies in historical context, omission of critical data, and lack of basic mathematical applications in calculating travel times call into question whether this report genuinely followed the MEPA and NEPA processes to identify the most effective solution—or whether it was crafted to validate a predetermined outcome. Based on this review and supporting documentation, it appears to be the latter.

While the East Side Corridor concept originated in the 1990s and a general route was identified, those plans were effectively abandoned in 2004 when the City of Owatonna and Steele County allowed homes to be built within the mapped right-of-way. This shift was documented in subsequent studies, and future transportation plans modified the alignment, including shorter and more easterly alternatives. 34th Avenue (Alternative 5 today) was specifically mapped and preserved as an inner corridor, consistent with multiple studies and policy goals.

When standard travel time formulas are properly applied, Alternatives 4 and 5 are found to be equally fast—or even faster—than Alternative 3. They also have far fewer impacts to existing neighborhoods. While the project offers minimal current relief for existing traffic congestion, it does provide potential long-term benefit to future residents. Ironically, the neighborhood most affected by Alternative 3—N. Country—is also the one that stands to gain the most immediate benefit, and yet its residents have consistently advocated for avoidance since the first public open house in July 2021. Despite this, their input appears to have been disregarded, with inaccuracies and omissions passed along to state and federal authorities.

A full cost analysis shows that Alternatives 4 and 5 are more cost-effective than Alternatives 1–3. However, that analysis was excluded based on inaccurate travel time assumptions—assumptions that were not grounded in formulaic math but rather Google Maps and estimates. This flaw significantly undermines the credibility of the stated rationale for selecting Alternative 3.

Of the remaining options, Alternative 4 is the fastest and slightly more cost-effective, but it lies in a floodplain and would impact more farmland. Alternative 5—34th Avenue—offers a mapped corridor, existing roadbed, owned right-of-way, and fewer disruptions to farmland or homes. For over 30 years, residents have voiced support for this route. Nearly 600 people have now formally advocated for it.

Based on all of the above, Alternative 5 (34th Avenue) should be considered the data-supported, cost-effective, community-aligned, and environmentally responsible Preferred Alternative for the East Side Corridor.

Comment #220

ESC EAW Comments #11

Inconsistent and Misleading Traffic and Noise Information – Unreliable Technical Information Undermining Public Participation

Meaningful public participation under MEPA requires that residents be provided with consistent and accurate technical information. Throughout the East Side Corridor process, key traffic, noise, and alternative representations changed repeatedly, undermining the public's ability to understand and comment on project impacts.

At a May 26, 2023 stakeholder meeting, project staff stated that truck traffic would comprise approximately **15%** of daily traffic. Using the traffic volumes provided at that meeting, residents calculated this to be approximately **750 trucks per day**.

After residents began referencing this daily truck count—derived directly from staff-provided figures—the percentage characterization of truck traffic was subsequently revised downward. No new data or analysis was presented to explain these revisions.

Despite the fact that residents continued to reference the original figures provided by project staff, residents were later told they were exaggerating, making things up, or lacked credibility. As a result of these shifting representations, residents were left unable to determine which traffic assumptions were accurate, undermining meaningful public participation and confidence in the underlying analysis.

Similar inconsistencies occurred regarding **setback distances** between the proposed right-of-way and existing homes. Using the only tools available to them, residents measured the distance from homes to the proposed right-of-way to be approximately **15 feet**. On **October 1, 2024**, project consultant WSB confirmed that the distance was approximately **17 feet**. Despite this confirmation, residents were again criticized for referencing both the earlier estimate and the later consultant-confirmed distance. This focus on a two-foot difference misses the real issue: the proposed roadway would be placed **within tens of feet of existing homes**, not at a meaningful separation distance. Under MEPA, the relevant question is whether project design avoids or minimizes impacts by providing separation distances typically measured in **several hundreds of feet**, not a debate over inches.

Similar inconsistencies occurred, on December 11, 2025 at the final open house, regarding noise impacts and mitigation. Final mitigation, that residents had no say in, berm heights on the same display, were described to residents as both **2.5–3 feet** and **"at least 10 feet,"** despite those statements being incompatible. Noise walls were alternately described as unnecessary, undesirable, or categorically unavailable, without supporting analysis.

When technical assumptions change repeatedly and are later used to discredit public comments, public participation is rendered illusory. These inconsistencies prevent residents from meaningfully evaluating impacts or alternatives.

Because the EAW relies on unstable and inconsistently communicated technical assumptions, it fails to provide a reliable basis for environmental decision-making and cannot support a Finding of No Significant Impact. A full Environmental Impact Statement is required.

Owatonna East Side Corridor Residents

OwatonnaEastSideCorridor@gmail.com

Comment #221

ESC EAW Comments #18

Failure to Evaluate and Disclose a Feasible Avoidance Alternative (Alternative 3B)

MEPA and NEPA require that environmental impacts be avoided where feasible and that reasonable avoidance alternatives be fully evaluated and disclosed to the public. The Environmental Assessment Worksheet (EAW) for the East Side Corridor fails this requirement by omitting **Alternative 3B**, a feasible avoidance alignment that was designed, modeled, evaluated, and treated internally as the appropriate response to identified noise impacts, yet was excluded entirely from the EAW.

Project correspondence from **June 2023 through mid-2024** demonstrates that Steele County, WSB, and MnDOT actively evaluated **Alternative 3B**, a realigned version of Alternative 3 intended to shift the roadway east to reduce residential noise impacts. Internal emails confirm that modeling was performed on the realigned alignment, that cultural resources surveys and Areas of Potential Effect were expanded to accommodate it, and that consultant contracts were amended to reflect these changes. These actions show that Alternative 3B was operationally advanced and met project criteria, not merely conceptual.

Contract amendment records confirm that detailed noise analysis and modeling had been completed for a realigned version of Alternative 3, identified in project correspondence as Alternative 3B. However, **internal County Engineer review comments directed WSB not to identify specific alternatives or affected neighborhoods in public-facing materials.** As a result, when the contract amendment was presented to the County Board on September 24, 2024, the completed analysis of **Alternative 3B was not disclosed or clearly identified.** The omission of a studied avoidance alternative from materials presented to decision-makers and the public renders the environmental process flawed and the EAW incomplete and misleading by omission.

Additional correspondence shows that County staff and consultants explicitly intended to address noise impacts **through roadway relocation rather than construction of a noise wall**, and that moving the roadway to the Alternative 3B alignment was understood to be the avoidance option if residents voted for noise wall mitigation—something residents had made clear they were prepared to do. Internal emails reflect that the County anticipated shifting the roadway east if mitigation options were supported, confirming that avoidance was known to be feasible and was treated as the functional alternative to noise wall construction.

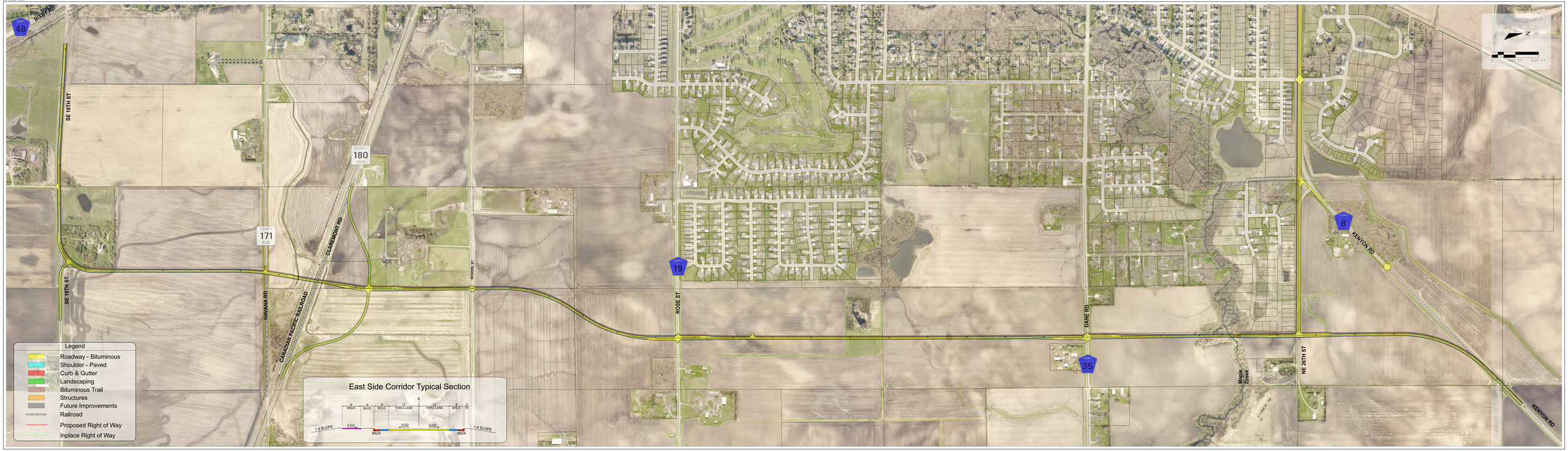
Despite this, **Alternative 3B is entirely absent from the EAW**. While state and interagency correspondence referenced in the project record repeatedly acknowledges alignment shifts, realignments of Alternative 3, avoidance-based responses to noise impacts, and specifically “3B”, the EAW fails to disclose Alternative 3B as a distinct alternative, fails to evaluate its environmental impacts, and fails to compare it against the selected preferred alignment. The EAW fails to present Alternative “3B” entirely. The public record instead presents a truncated alternatives analysis that omits a feasible avoidance option known to and relied upon by the County.

Internal communications further demonstrate that avoidance was not rejected due to environmental infeasibility, but due to non-environmental considerations such as development agreements, land use preferences, and utilities. By proceeding directly to mitigation analysis and public discussion of noise walls while withholding a viable avoidance alternative, the County inverted the required sequencing under MEPA and NEPA, which require avoidance to be evaluated before mitigation.

The public was never informed that Alternative 3B existed, had been designed, or had been studied. Alternative 3B was actively withheld from public disclosure. Residents became aware of Alternative 3B only through public data requests, not through the environmental review process. This omission deprived the public of meaningful participation and renders the EAW misleading by omission.

Because Alternative 3B represents a feasible avoidance alternative that was known, studied, and treated internally as the appropriate response to environmental impacts, yet excluded from the EAW, the environmental review is incomplete and procedurally deficient. The omission of Alternative 3B invalidates the alternatives analysis and precludes a lawful Finding of No Significant Impact. At minimum, the EAW must be revised to fully evaluate Alternative 3B; preparation of an Independent Environmental Impact Statement is warranted.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com



Steele County

East Side Corridor Study
Steele County, Minnesota

PROJECT LAYOUT - ALTERNATIVE 3B

June 4, 2024

wsb

From: Cabral Neto, Fausto (DOT) [redacted]
Sent: Monday, September 30, 2024 8:11 AM
To: Fenske, James W (DOT)
Subject: FW: Request for Clarification on East Side Corridor Project Updates and Concerns

fyi

From: Cabral Neto, Fausto (DOT)
Sent: Monday, September 30, 2024 7:29 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Bottos, Elisa (DOT) [redacted] Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: RE: Request for Clarification on East Side Corridor Project Updates and Concerns

Hello Paul,

I suggest to you, or your team, verify if are there new commentary among the new email that have not been responded to in 2023.
Provide response to those comments in combination to the commentary that will be received at future public meetings informing when it was initially addressed.
An environmental document captures all public input and provided responses.
In some instances, the already given answers can be repeated, if issues that it relates to haven't changed from the time when it was initially addressed.

Thanks

Fausto Cabral PE MS-ISE
507 251 1930
District State Aid Engineer
MN DOT District 6

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Monday, September 30, 2024 6:32 AM
To: Cabral Neto, Fausto (DOT) [redacted]; Bottos, Elisa (DOT) [redacted]; Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: Re: Request for Clarification on East Side Corridor Project Updates and Concerns

Looking for any thoughts on how to respond to this email full of inaccuracies and misinformation. Melissa has twisted things to meet her own agenda here. Shall we set up a teams meeting to discuss a response?I suggest a meeting with MnDOT, city and county engineers and administrators.

The study did look at all alternatives. She unfortunately doesn't like the fact that her preferred alternative didn't get past the purpose and need for the project and that we didn't study it in more detail. There are many reports in the memo outlining how we studied traffic and other information to come to that conclusion.

She's under the impression we were going to have a public meeting to discuss the chosen alternative but we already did, back in May 2023. There will be another public meeting for the final environmental document with a 30 day public comment period. And we've told her that. A meeting now will only confuse the majority of the public. I've gotten many comments of confusion why we even started over (NPCE vs PCE), so don't want to confuse the public even more.

The entire memo is public on our website and available for her to read. We put it out there as quick as possible just for her. And we've told her that. Including the previous 2 memos (purpose and need and evaluation criteria). We'll make other reports(wetlands, archaeological, traffic, noise, etc.) available on the website as we complete them. And I've told her that. I mentioned we have a few other updates to the website, but only just to summarize that 3rd memo. It takes time for our consultant to draft changes and then for the county and city to review before going live. And we are working on a newsletter to update the public. That will come soon. And we've told her that. Melissa needs to be patient.

We are doing a noise wall study. And a noise wall is only one alternative we are looking at. She was at the board meeting when we showed the board several options we are considering. That will come with all the other mitigation things that we must do. We've told Melissa many times that we can't look at mitigation, avoidance until we have the preferred alternative. Now we are starting those processes now that we have the memos completed.

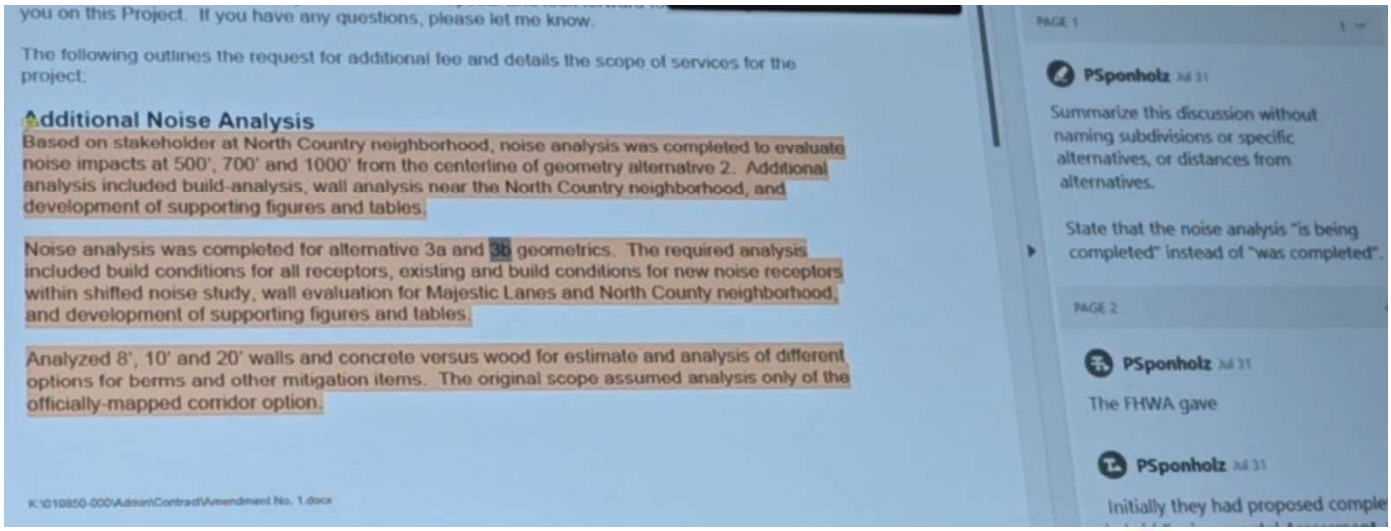
I'm not sure how she has misunderstood that I said a noise wall will not be considered. Certainly I've said it's not in the county's interest due to the cost and if there is a way to avoid a wall we will. But we still need to follow the federal process and it will be considered. And I've told her that.

We aren't ready to discuss publicly, but other options to avoid the wall and address federal noise standards include moving the road 600-800 feet east, assuming it reduces noise impacts. It is feasible from the federal standpoint. How ever it has serious ramifications to the city and township and their development agreements, serious impacts to farmland since we already own 6 acres of land along the subdivision, and it would affect several farmer and their land, serious implications to area farmers and the many other people, who unlike [redacted], have always understood the road was going there and have told us they'd be very unhappy if we move it, serious impacts in how the city would redevelop that land with utilities, etc. All that discussion will like be looked at and included in the final reports.

The mitigation studies she is asking for is going to happen as we study impacts now and come up with avoidance and mitigations as we complete the environmental documentation. She needs patience. Ultimately she will unlikely be unhappy with the final results but we need to think of the county and city as a whole and not just her back yard.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 | M: (507) 475-2253 | paul.sponholz@steelecountymn.gov

County Engineer comments dated July 31, 2024 directed omission of alternative and neighborhood identifiers; the resulting contract amendment (dated September 3, 2024) was presented to the Board on September 24, 2024.



you on this Project. If you have any questions, please let me know.

The following outlines the request for additional fee and details the scope of services for the project:

Additional Noise Analysis

Based on stakeholder at North Country neighborhood, noise analysis was completed to evaluate noise impacts at 500', 700' and 1000' from the centerline of geometry alternative 2. Additional analysis included build-analysis, wall analysis near the North Country neighborhood, and development of supporting figures and tables.

Noise analysis was completed for alternative 3a and 3b geometrics. The required analysis included build conditions for all receptors, existing and build conditions for new noise receptors within shifted noise study, wall evaluation for Majestic Lanes and North County neighborhood, and development of supporting figures and tables.

Analyzed 8', 10' and 20' walls and concrete versus wood for estimate and analysis of different options for berms and other mitigation items. The original scope assumed analysis only of the officially-mapped corridor option.

K:\019850-000\Admin\Contract\Amendment No. 1.docx

PAGE 1

PSponholz Jul 31

Summarize this discussion without naming subdivisions or specific alternatives, or distances from alternatives.

State that the noise analysis "is being completed" instead of "was completed".

PAGE 2

PSponholz Jul 31

The FHWA gave

PSponholz Jul 31

Initially they had proposed comple

wsb

Memorandum

To: Paul Sponholz, Steele County

From: Andrew Plowman, WSB

Date: September 3, 2024

Re: East Side Corridor Project
WSB Project No. 019850-000
Contract Amendment No. 1

Pursuant to our discussions, WSB respectfully submits this amendment request for additional design services associated with the following tasks:

- Additional Noise Analysis
- Additional Concept Development and Analysis
- Public Engagement – Website Updates
- Right of Entries
- Additional Meetings and Coordination
- Visual Quality and Mitigation

The original contract total amount is $298,564. WSB respectfully requests compensation for these additional services in the not-to-exceed amount of $127,480, resulting in a revised contract total of $426,044, as summarized below:

If this Proposal is acceptable, please issue the appropriate Amendment incorporating this letter for our review and signature.

We thank you for the opportunity to submit this Proposal and look forward to continuing to with you on this Project. If you have any questions, please let me know.

The following outlines the request for additional fee and details the scope of services for the project:

Additional Noise Analysis

Noise analysis is being completed to evaluate noise impacts for various alternatives, instead of just one build alternative. This includes background data for the various alternatives and running multiple models.

Analyzed 8', 10' and 20' walls and concrete versus wood for estimate and analysis of different options for berms and other mitigation items. The original scope assumed analysis only of the officially-mapped corridor option.

The revised scope also includes the gathering of materials for possible implementation of any justifiable sound walls. This includes background materials, meetings and voting procedures.

The total cost for this task is $56,000, which is based on 400 hours of time with an average cost per hour of $140/hr.

701 XENIA AVENUE S | SUITE 300 | MINNEAPOLIS, MN | 55416 | 763.541.4800 | WSBENG.COM

2024 Emails

FW: Steele Co East Side Corridor - Alignment Shift

IG Ilkka, Gregory
To Sponholz, Paul

Reply | Reply All | Forward

Tue 8/20/2024 10:46 AM

Follow up. Completed on Wednesday, August 28, 2024.
You forwarded this message on 8/22/2024 1:13 PM.

RBA_MnDOT Cultural Resources Contract Amend.pdf
462 KB

Attached is an RBA to amend the architectural and archaeological work on the ESC. I wrote it up for next week's Board meeting, but I will not be in attendance. We can discuss.

Greg

From: Jones, Maggie (DOT) [redacted]
Sent: Wednesday, August 7, 2024 4:42 PM
To: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>
Cc: Kurth, Andrew (DOT) [redacted] Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: RE: Steele Co East Side Corridor - Alignment Shift

You don't often get email from maggie.jones@state.mn.us. Learn why this is important

Hi Greg –

I'm helping out with the contract amendment from the MnDOT side while Andrew is temporarily filling in a different role.

Westwood confirmed that they do not need additional funds, just additional time. Thanks!

Maggie

Maggie Jones, Historian and Unit Supervisor (she/her)
Cultural Resources Unit, Office of Environmental Stewardship, MnDOT

RE: SP 074-070-009 Steele Co East Side Corridor - cultural resources consultant contract amendment

JM Jones, Maggie (DOT) [redacted]
To Sponholz, Paul
Cc Ilkka, Gregory; Cabral Neto, Fausto (DOT); Mary Gute; Andrew Plowman; Ohland, Kathryn (DOT)

Reply | Reply All | Forward

Mon 6/10/2024 3:33 PM

Some people who received this message don't often get email from [redacted] earn why this is important

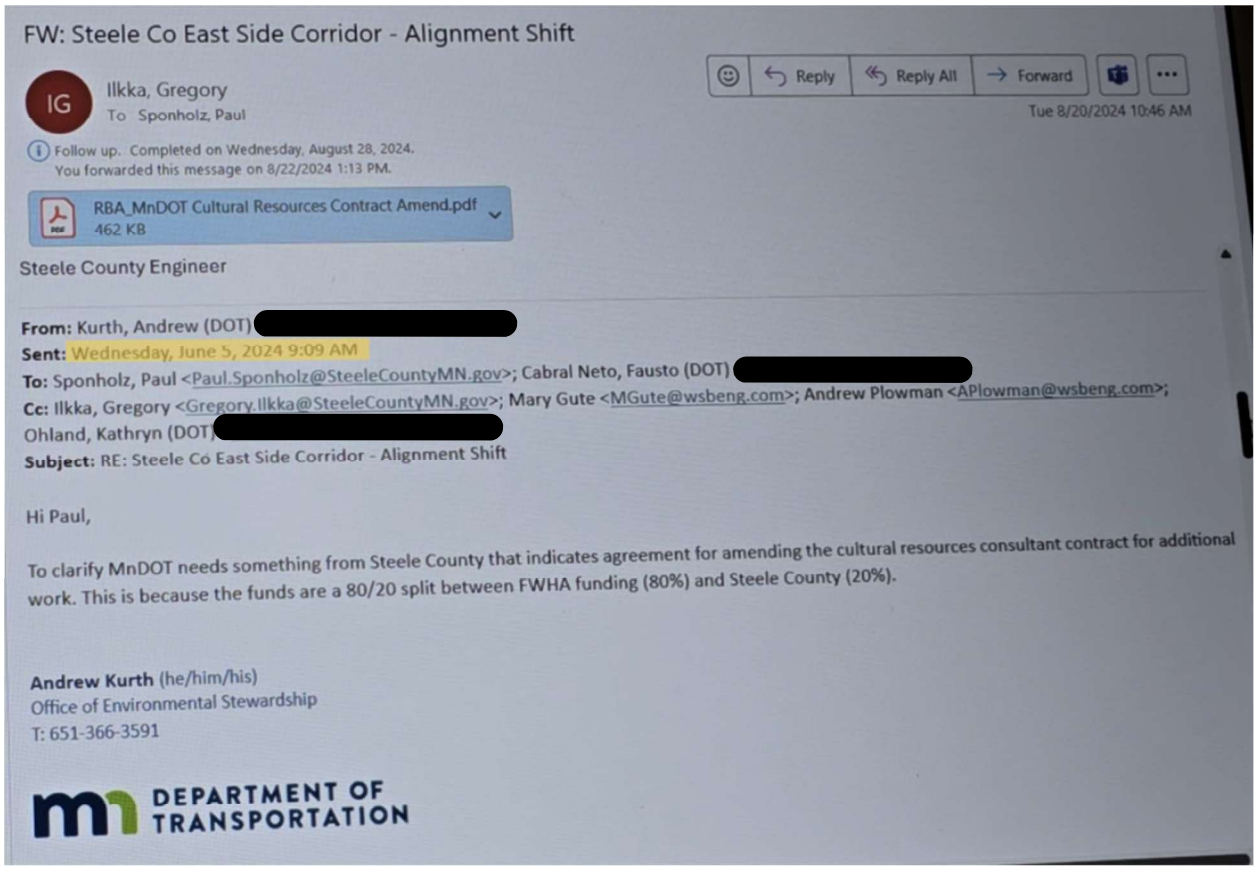
Hi Paul –

Thanks for the confirmation that Steele County would like to move forward with an 80/20 split for any additional costs. I've updated the project Area of Potential Effect to include the revised alignment and sent to the consultant, Westwood. I'll let you know when I hear back what the additional cost is. Thanks!

Maggie

Maggie Jones, Historian and Unit Supervisor (she/her)
Cultural Resources Unit, Office of Environmental Stewardship, MnDOT
Mail Stop 620, 395 John Ireland Boulevard, St. Paul, MN 55155
Phone: 651-392-5424

DEPARTMENT OF TRANSPORTATION



FW: Steele Co East Side Corridor - Alignment Shift

IG Ilkka, Gregory
To Sponholz, Paul

Reply | Reply All | Forward

Tue 8/20/2024 10:46 AM

Follow up. Completed on Wednesday, August 28, 2024.
You forwarded this message on 8/22/2024 1:13 PM.

RBA_MnDOT Cultural Resources Contract Amend.pdf
462 KB

Steele County Engineer

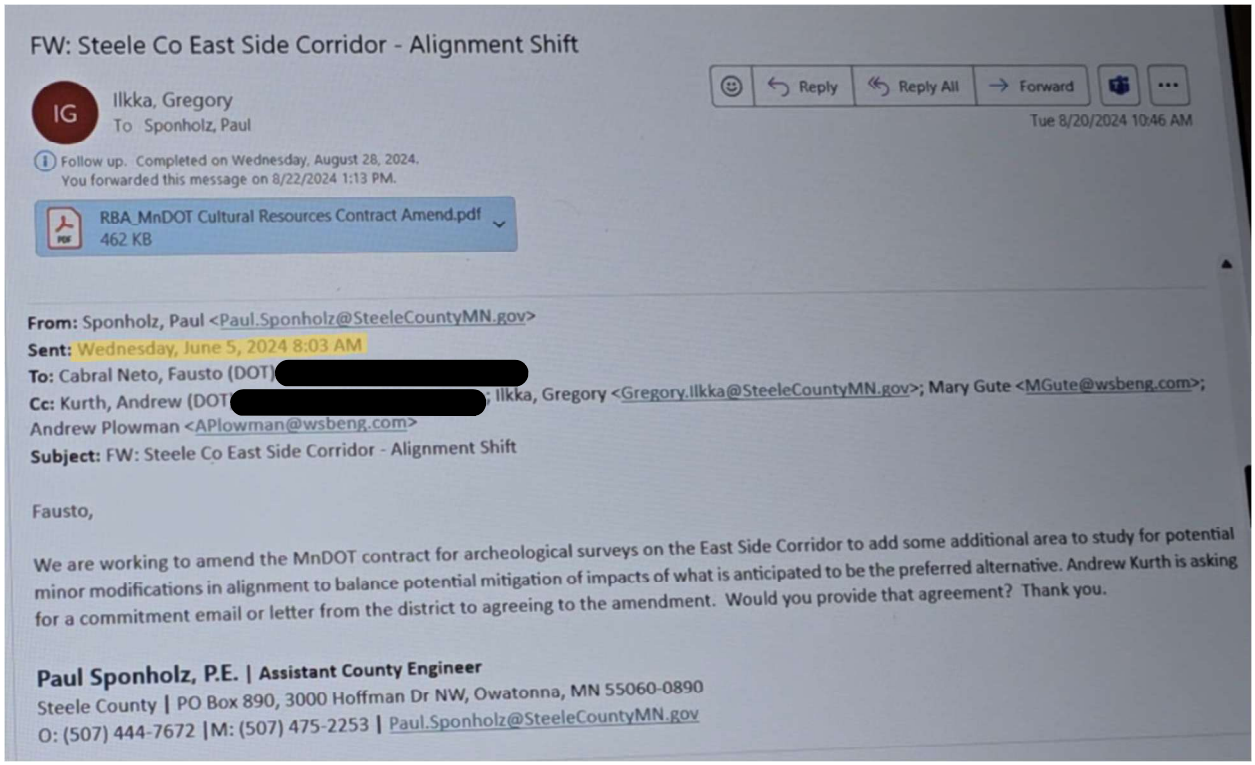
From: Kurth, Andrew (DOT) [redacted]
Sent: Wednesday, June 5, 2024 9:09 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Cabral Neto, Fausto (DOT) [redacted]
Cc: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Ohland, Kathryn (DOT) [redacted]
Subject: RE: Steele Co East Side Corridor - Alignment Shift

Hi Paul,

To clarify MnDOT needs something from Steele County that indicates agreement for amending the cultural resources consultant contract for additional work. This is because the funds are a 80/20 split between FWHA funding (80%) and Steele County (20%).

Andrew Kurth (he/him/his)
Office of Environmental Stewardship
T: 651-366-3591

DEPARTMENT OF TRANSPORTATION



FW: Steele Co East Side Corridor - Alignment Shift

IG Ilkka, Gregory
To Sponholz, Paul

Reply | Reply All | Forward

Tue 8/20/2024 10:46 AM

Follow up. Completed on Wednesday, August 28, 2024.
You forwarded this message on 8/22/2024 1:13 PM.

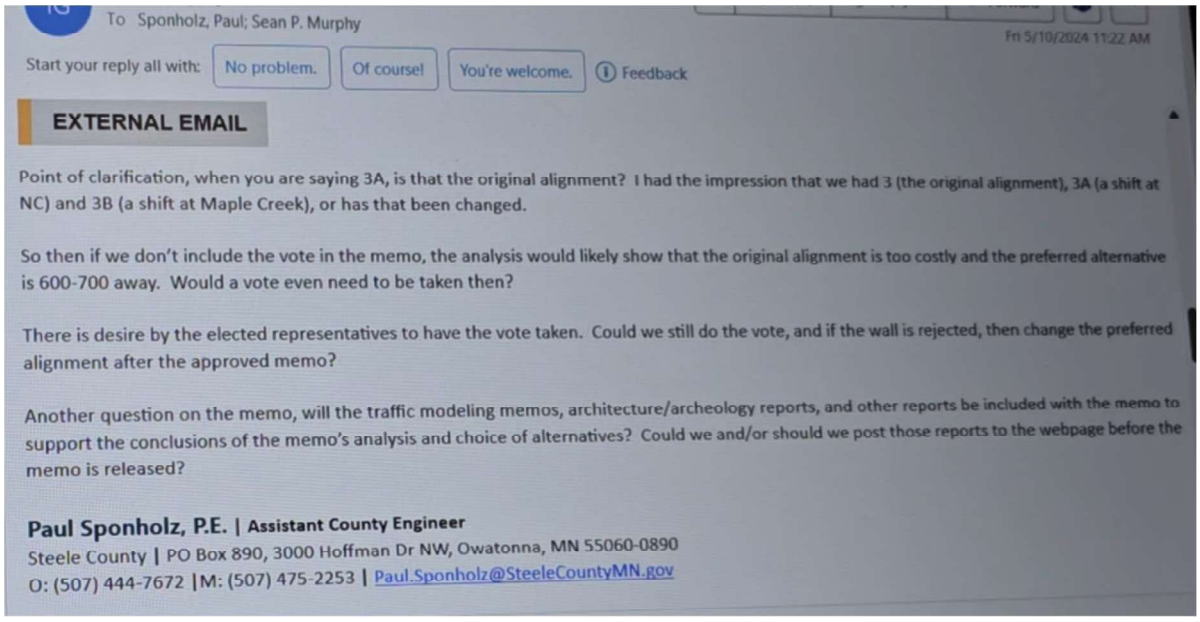
RBA_MnDOT Cultural Resources Contract Amend.pdf
462 KB

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Wednesday, June 5, 2024 8:03 AM
To: Cabral Neto, Fausto (DOT) [redacted]
Cc: Kurth, Andrew (DOT) [redacted]; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>
Subject: FW: Steele Co East Side Corridor - Alignment Shift

Fausto,

We are working to amend the MnDOT contract for archeological surveys on the East Side Corridor to add some additional area to study for potential minor modifications in alignment to balance potential mitigation of impacts of what is anticipated to be the preferred alternative. Andrew Kurth is asking for a commitment email or letter from the district to agreeing to the amendment. Would you provide that agreement? Thank you.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



To Sponholz, Paul; Sean P. Murphy

Fri 5/10/2024 11:22 AM

Start your reply all with: No problem. Of course! You're welcome. Feedback

EXTERNAL EMAIL

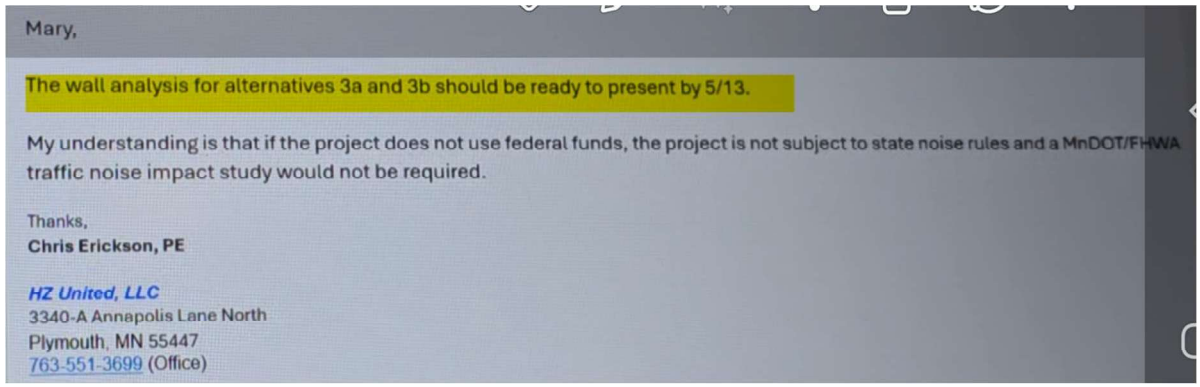
Point of clarification, when you are saying 3A, is that the original alignment? I had the impression that we had 3 (the original alignment), 3A (a shift at NC) and 3B (a shift at Maple Creek), or has that been changed.

So then if we don't include the vote in the memo, the analysis would likely show that the original alignment is too costly and the preferred alternative is 600-700 away. Would a vote even need to be taken then?

There is desire by the elected representatives to have the vote taken. Could we still do the vote, and if the wall is rejected, then change the preferred alignment after the approved memo?

Another question on the memo, will the traffic modeling memos, architecture/archeology reports, and other reports be included with the memo to support the conclusions of the memo's analysis and choice of alternatives? Could we and/or should we post those reports to the webpage before the memo is released?

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov



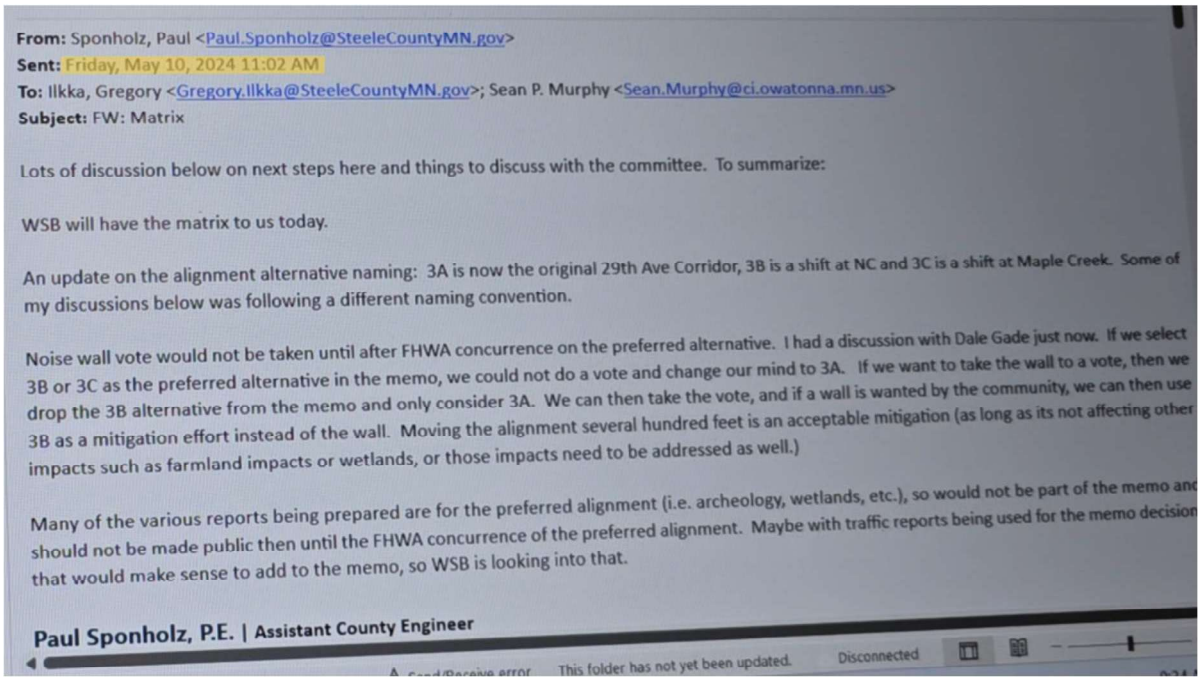
Mary,

The wall analysis for alternatives 3a and 3b should be ready to present by 5/13.

My understanding is that if the project does not use federal funds, the project is not subject to state noise rules and a MnDOT/FHWA traffic noise impact study would not be required.

Thanks,
Chris Erickson, PE

HZ United, LLC
3340-A Annapolis Lane North
Plymouth, MN 55447
763-551-3699 (Office)



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 11:02 AM
To: Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>
Subject: FW: Matrix

Lots of discussion below on next steps here and things to discuss with the committee. To summarize:

WSB will have the matrix to us today.

An update on the alignment alternative naming: 3A is now the original 29th Ave Corridor, 3B is a shift at NC and 3C is a shift at Maple Creek. Some of my discussions below was following a different naming convention.

Noise wall vote would not be taken until after FHWA concurrence on the preferred alternative. I had a discussion with Dale Gade just now. If we select 3B or 3C as the preferred alternative in the memo, we could not do a vote and change our mind to 3A. If we want to take the wall to a vote, then we drop the 3B alternative from the memo and only consider 3A. We can then take the vote, and if a wall is wanted by the community, we can then use 3B as a mitigation effort instead of the wall. Moving the alignment several hundred feet is an acceptable mitigation (as long as its not affecting other impacts such as farmland impacts or wetlands, or those impacts need to be addressed as well.)

Many of the various reports being prepared are for the preferred alignment (i.e. archeology, wetlands, etc.), so would not be part of the memo and should not be made public then until the FHWA concurrence of the preferred alignment. Maybe with traffic reports being used for the memo decision that would make sense to add to the memo, so WSB is looking into that.

Paul Sponholz, P.E. | Assistant County Engineer

Send/Receive error This folder has not yet been updated. Disconnected

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 9:17 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Yeah sorry, to make it clear. 3A is original, 3B is (a shift at NC) and 3C (as shift at Maple Creek).

Well, we are going to show the costs separately, and the noise wall cost is just a portion of the overall analysis. But, if we choose option 3B for instance, then correct, no vote would ultimately be necessary.

I will let Mary and/or Jack chime in on the vote taking timeline. But, my understanding is that the vote would not happen ahead of time and then we change depending on the outcome.

Andrew
612.360.1311

From: Mary Gute <MGute@wsbeng.com>
Sent: Friday, May 10, 2024 9:34 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Hi Paul – The noise vote will not be included in the alternatives eval memo. This memo is just to get FHWA's concurrence on the evaluation of ESC alternatives, and identification of a preferred alternative. The vote would take place later, as determined necessary by the results of the noise analysis.

I'll also note that we're not including any detailed environmental reports (cultural resources, historical architecture, etc.), as those'll be done only for the preferred alternative that is carried forward into the EA and/or EAW. I'll need to look at what's included in the traffic memo and talk to Jason to see if it makes sense to include that as an attachment to the memo.

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

this folder has not yet been updated. Disconnected

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 9:17 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Yeah sorry, to make it clear. 3A is original, 3B is (a shift at NC) and 3C (as shift at Maple Creek).

Well, we are going to show the costs separately, and the noise wall cost is just a portion of the overall analysis. But, if we choose option 3B for instance, then correct, no vote would ultimately be necessary.

I will let Mary and/or Jack chime in on the vote taking timeline. But, my understanding is that the vote would not happen ahead of time and then we change depending on the outcome.

Andrew
612.360.1311

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, May 10, 2024 8:50 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Mary Gute <MGute@wsbeng.com>
Cc: Jack Corkle <JCorkle@wsbeng.com>
Subject: RE: Matrix

Paul,

I just was speaking with Jack, and the vote would not happen prior to finalizing the memo. And, I think it is fairly safe to say that most will vote for having the wall for option 3A. We don't really think it will be dependent on if they are supportive of the project or not. If I lived along that area, heck I would likely vote for the wall too.

We will include the sound wall costs separately, so it is very evident for the meeting.

Andrew Plowman, PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
WSB | wsbeng.com

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, May 10, 2024 8:35 AM
To: Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Matrix

EXTERNAL EMAIL

Would we do a vote before finalizing the concurrence memo and submitting to FHWA so that we can determine the final need for the wall? We aren't going to build a sound wall, but if the neighborhood votes against the wall, we can move forward with the original alignment.

Include the sound wall costs in the matrix for now and we can discuss with the Committee on Monday.

So far, the idea of abandoning federal funding isn't being well received. And with the uncertainty of federal requirements in permits, not something we'll likely pursue. We'll have a better feel of that idea on Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

Start your reply all with: No problem. | Of course! | You're welcome. | Feedback

Andrew and Mary,

I got thinking, how does this voting process work? Would it make sense to leave off the cost of the sound wall from the Option 3 estimate, maybe have an asterisk on it stating sound wall isn't included. That would probably show a similar cost as Options 3A and 3B which likely then would cost more given more r/w needs. So given the farmland impacts, right of way costs, and conforming to 30 years of plans, the original Option 3 would likely be the preferred corridor, right?

Do we then present that to the FHWA? Or do we bring a vote to the community before finalizing the memo? Then after the vote is determined, if the sound wall is voted for, we can select 3A or 3B. Or if the sound wall is rejected, we can continue with the original 3.

Or does the vote come after the FHWA concurrence, which if the wall is wanted, we could then modify to 3A or 3B because of cost and mitigation efforts in the final environmental documents?

Does it make sense to have a neighborhood "public" meeting prior to the vote to explain the noise analysis results and the voting process? Or is that already part of that process?

Thoughts? Please call if easier to discuss.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, May 9, 2024 7:04 PM
To: Andrew Plowman <APlowman@wsbeng.com>
Cc: Mary Gute <MGute@wsbeng.com>
Subject: Re: Matrix

We had our Public Works Committee today. Consensus was we are going to continue the federal process. Too many ramifications to walk away from it. But that doesn't consider the city's desire the keep the original 29th Ave corridor. One option talked about it to take the wall to a vote. We'll have to see what the consensus will be from the Joint Transportation Committee meeting Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 |paul.sponholz@steelecountymn.gov

On Thu, Apr 25, 2024 at 10:30 AM Mary Gute <MGute@wsbeng.com> wrote:

> Chris & Becky – Would you be ready to discuss the results of modeling the realignments of alternative 3 during a meeting with the ESC PMT on May 13th? There is a joint transportation committee meeting with Owatonna and Steele Co later that week. The county could like to share with the committee whether or not a noise wall would likely be needed with the shifted alignment(s). Please let me know if that date works for a call, and if there are any time on that day where you couldn't do a call.
>
> Also, we'll want to share with the city and county what noise analysis would be required if the county were to turn back federal funding and would just be required to do an EAW. I'll look into this and let you know what I find, but I'm interested both of you weighing in too. Thanks! Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

4/17/2024 3:59PM

RE: SP 074-070-009 - Project Update

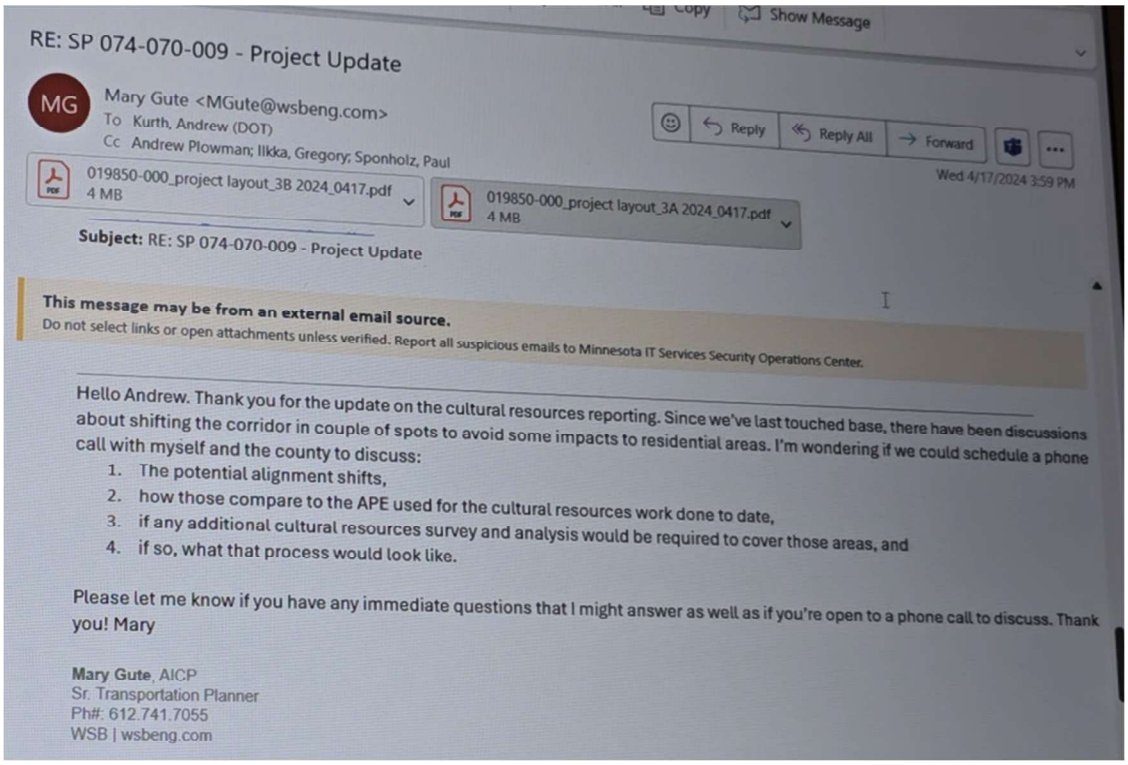
MG Mary Gute <MGute@wsbeng.com>
To Kurth, Andrew (DOT)
Cc Andrew Plowman; Ilkka, Gregory; Sponholz, Paul

Reply | Reply All | Forward

019850-000_project layout_3B 2024_0417.pdf 4 MB
019850-000_project layout_3A 2024_0417.pdf 4 MB

Andrew, as requested, here are the two alignment changes the county is considering. Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com



RE: SP 074-070-009 - Project Update

Mary Gute <MGute@wsbeng.com>
To Kurth, Andrew (DOT)
Cc Andrew Plowman; Ilkka, Gregory; Sponholz, Paul

Reply | Reply All | Forward

Wed 4/17/2024 3:59 PM

019850-000_project layout_3B 2024_0417.pdf 4 MB
019850-000_project layout_3A 2024_0417.pdf 4 MB

Subject: RE: SP 074-070-009 - Project Update

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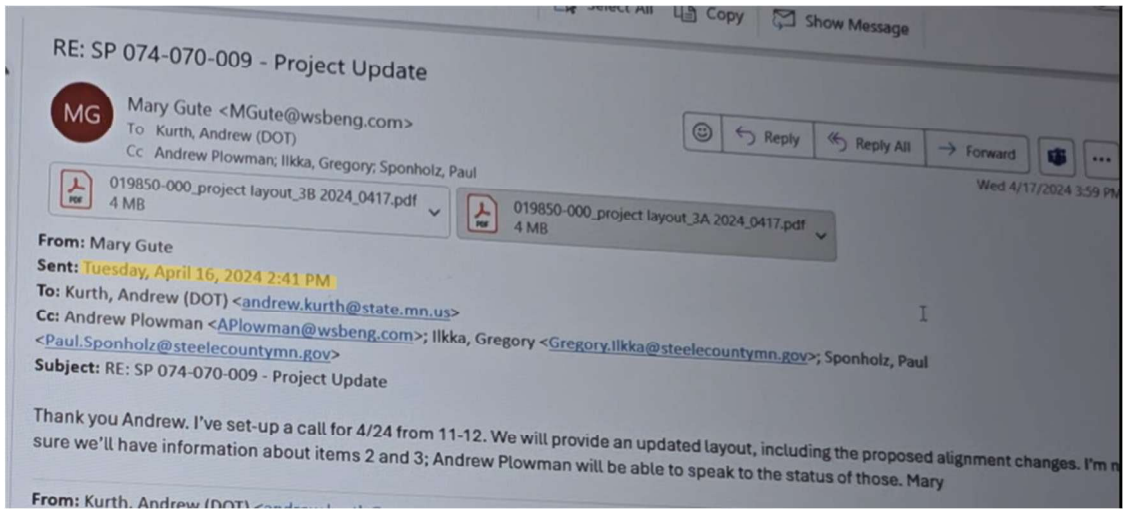
Hello Andrew. Thank you for the update on the cultural resources reporting. Since we've last touched base, there have been discussions about shifting the corridor in couple of spots to avoid some impacts to residential areas. I'm wondering if we could schedule a phone call with myself and the county to discuss:

1. The potential alignment shifts,
2. how those compare to the APE used for the cultural resources work done to date,
3. if any additional cultural resources survey and analysis would be required to cover those areas, and
4. if so, what that process would look like.

Please let me know if you have any immediate questions that I might answer as well as if you're open to a phone call to discuss. Thank you! Mary

Mary Gute, AICP
Sr. Transportation Planner
Ph#: 612.741.7055
WSB | wsbeng.com



Copy | Show Message

RE: SP 074-070-009 - Project Update

Mary Gute <MGute@wsbeng.com>
To Kurth, Andrew (DOT)
Cc Andrew Plowman; Ilkka, Gregory; Sponholz, Paul

Reply | Reply All | Forward

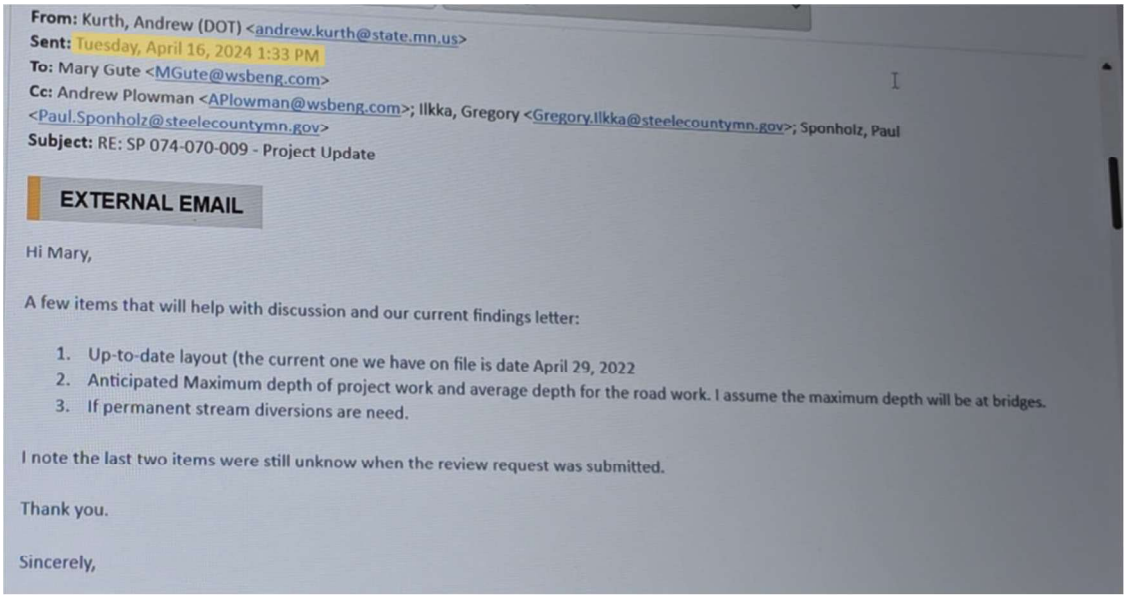
Wed 4/17/2024 3:59 PM

019850-000_project layout_3B 2024_0417.pdf 4 MB
019850-000_project layout_3A 2024_0417.pdf 4 MB

From: Mary Gute
Sent: Tuesday, April 16, 2024 2:41 PM
To: Kurth, Andrew (DOT) <andrew.kurth@state.mn.us>
Cc: Andrew Plowman <APlowman@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@steelecountymn.gov>; Sponholz, Paul <Paul.Sponholz@steelecountymn.gov>
Subject: RE: SP 074-070-009 - Project Update

Thank you Andrew. I've set-up a call for 4/24 from 11-12. We will provide an updated layout, including the proposed alignment changes. I'm n sure we'll have information about items 2 and 3; Andrew Plowman will be able to speak to the status of those. Mary

From: Kurth, Andrew (DOT) <



From: Kurth, Andrew (DOT) <andrew.kurth@state.mn.us>
Sent: Tuesday, April 16, 2024 1:33 PM
To: Mary Gute <MGute@wsbeng.com>
Cc: Andrew Plowman <APlowman@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@steelecountymn.gov>; Sponholz, Paul <Paul.Sponholz@steelecountymn.gov>
Subject: RE: SP 074-070-009 - Project Update

EXTERNAL EMAIL

Hi Mary,

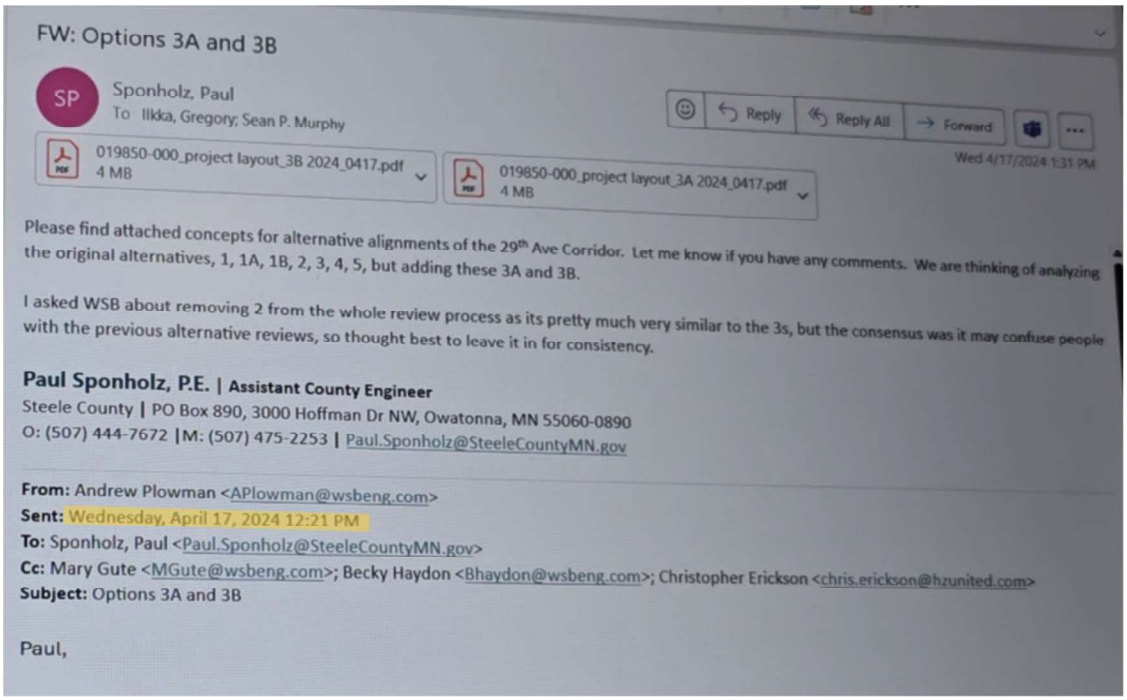
A few items that will help with discussion and our current findings letter:

1. Up-to-date layout (the current one we have on file is date April 29, 2022
2. Anticipated Maximum depth of project work and average depth for the road work. I assume the maximum depth will be at bridges.
3. If permanent stream diversions are need.

I note the last two items were still unknow when the review request was submitted.

Thank you.

Sincerely,



FW: Options 3A and 3B

SP Sponholz, Paul
To Ilkka, Gregory; Sean P. Murphy

Reply | Reply All | Forward

Wed 4/17/2024 1:31 PM

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019850-000_project layout_3A 2024_0417.pdf 4 MB

Please find attached concepts for alternative alignments of the 29th Ave Corridor. Let me know if you have any comments. We are thinking of analyzing the original alternatives, 1, 1A, 1B, 2, 3, 4, 5, but adding these 3A and 3B.

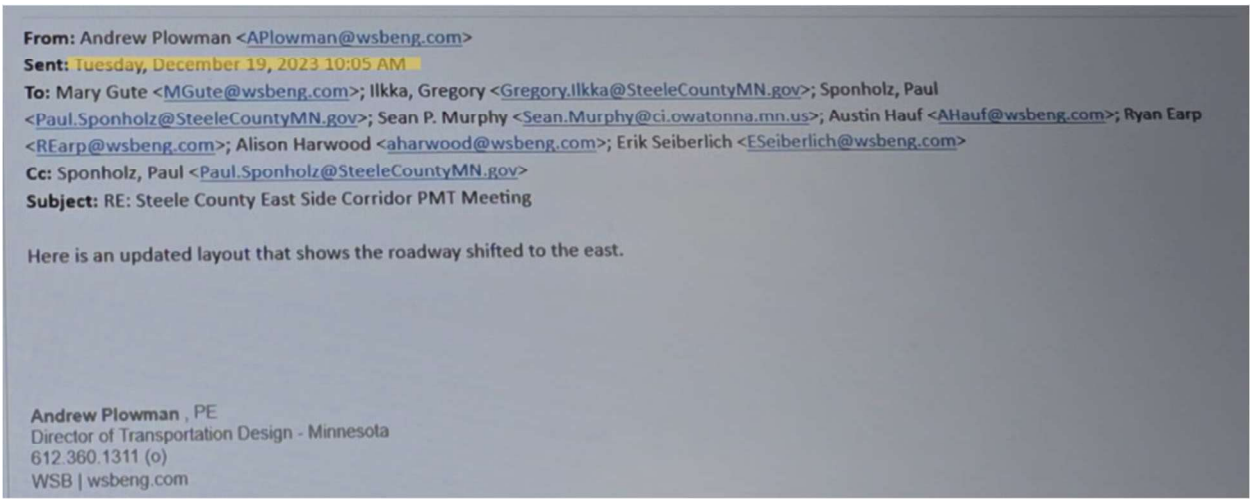
I asked WSB about removing 2 from the whole review process as its pretty much very similar to the 3s, but the consensus was it may confuse people with the previous alternative reviews, so thought best to leave it in for consistency.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Wednesday, April 17, 2024 12:21 PM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Cc: Mary Gute <MGute@wsbeng.com>; Becky Haydon <Bhaydon@wsbeng.com>; Christopher Erickson <chris.erickson@hzunited.com>
Subject: Options 3A and 3B

Paul,

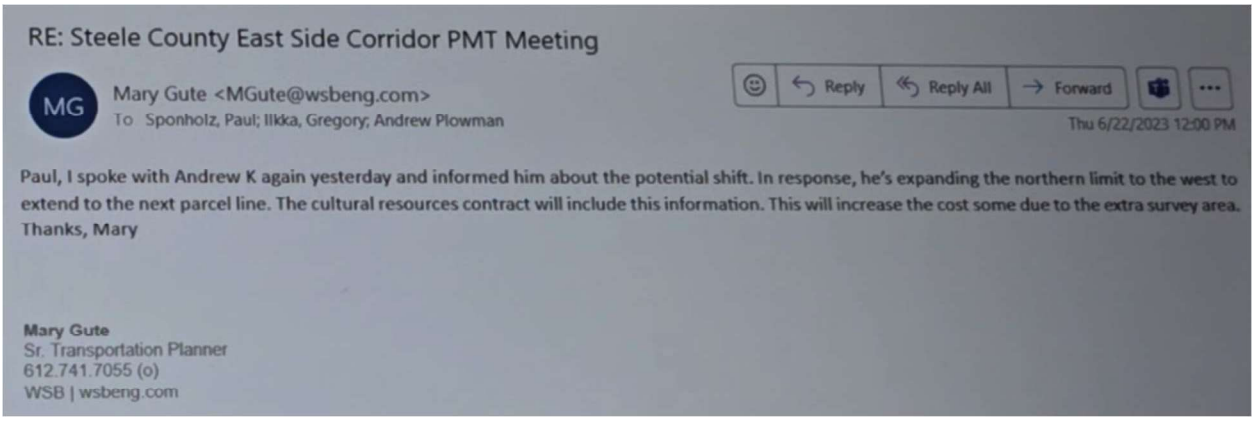
2023



From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Tuesday, December 19, 2023 10:05 AM
To: Mary Gute <MGute@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Sean P. Murphy <Sean.Murphy@ci.owatonna.mn.us>; Austin Hauf <AHauf@wsbeng.com>; Ryan Earp <REarp@wsbeng.com>; Alison Harwood <aharwood@wsbeng.com>; Erik Seiberlich <ESeiberlich@wsbeng.com>
Cc: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: RE: Steele County East Side Corridor PMT Meeting

Here is an updated layout that shows the roadway shifted to the east.

Andrew Plowman , PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
WSB | wsbeng.com



RE: Steele County East Side Corridor PMT Meeting

MG Mary Gute <MGute@wsbeng.com>
To Sponholz, Paul; Ilkka, Gregory; Andrew Plowman

Reply | Reply All | Forward

Thu 6/22/2023 12:00 PM

Paul, I spoke with Andrew K again yesterday and informed him about the potential shift. In response, he's expanding the northern limit to the west to extend to the next parcel line. The cultural resources contract will include this information. This will increase the cost some due to the extra survey area.
Thanks, Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, June 22, 2023 11:43 AM
To: Mary Gute <MGute@wsbeng.com>; Ilkka, Gregory <Gregory.Ilkka@SteeleCountyMN.gov>; Andrew Plowman <APlowman@wsbeng.com>
Subject: RE: Steele County East Side Corridor PMT Meeting

EXTERNAL EMAIL

If we have thoughts that we may want to shift the alignment, its best to get it all looked at now so we aren't redoing it later and hindering our timeline.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

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DEPARTMENT OF TRANSPORTATION

MnDOT Contract Number: 1053976

AMENDMENT NUMBER 1 TO MnDOT CONTRACT NUMBER: 1053976

Contract Start Date: October 04, 2023	Original Contract Amount:	$ 99,277.24
Original Contract Expiration Date: July 31, 2024	Previous Amendment(s) Total:	$ N/A
Current Contract Expiration Date: July 31, 2024	Current Amendment Amount:	$ 0.00
New Contract Expiration Date: January 31, 2025	Total Amended Contract Amount:	$ 99,277.24

Federal Project Number: STBG 8824(056)
State Project Number (SP): 074-070-009/8816-3550
Trunk Highway Number (TH): CSAH 8
Project Identification: Phase I and Phase II Architecture-History and Archaeological Investigations

This amendment is by and between the State of Minnesota, through its Commissioner of Transportation ("State") and **Steele County,** Address: 630 Florence Avenue, Owatonna, MN 55060-0890 ("County") and **Westwood Professional Services, Inc.,** Address: 12701 Whitewater Drive, #300, Minnetonka, MN 55343 ("Contractor").

RECITALS

1. State has a contract with Contractor identified as MnDOT Contract Number 1053976 ("Original Contract") to complete Phase I and Phase II Architecture-History and Archaeological Investigations for the CSAH 8 Realignment in Steele County, MN.

2. The County has changed the scope of the project and the construction limits which requires additional survey for archaeology and architecture/history. There is no change to the scope or the budget. It is necessary to amend this contract for additional time to allow Contractor to complete all duties required.

3. State and Contractor are willing to amend the Original Contract as stated below.

CONTRACT AMENDMENT

Unless otherwise noted, in this amendment, deleted contract terms will be struck out and the added contract terms will be bolded and underlined.

REVISION 1. Subarticle 1.2 is amended as follows:

1.2 **Expiration date.** This contract will expire on ~~July 31, 2024~~ **January 31, 2025**, or when all obligations have been satisfactorily fulfilled, whichever occurs first.

The Original Contract and any previous amendments are incorporated into this amendment by reference. Except as amended herein, the terms and conditions of the Original Contract and any previous amendment remain in full force and effect.

Subject: Resolution – Approve Amendment Number 1 to MnDOT Contract No. 1053976 and Authorize the Chair and Administrator to Execute the Contract.

Department: Highway

Committee Meeting Date: N/A

Board Meeting Date: August 27, 2024

Consent Agenda: ☐ Yes ☒ No **Resolution:** ☒ Yes ☐ No

Policy Committee Recommendation:

N/A

Recommendation:

Adopt Resolution - Approve Amendment Number 1 to MnDOT Contract No. 1053976 and authorize the Chair and Administrator to execute the agreement.

Background *(Including Budget Impact)*:

MnDOT Professional and Technical Services Contract No. 1053976 is a contract for Phase I and II Architecture-History and Archaeological Investigations for the eastside corridor environmental assessment worksheet with MnDOT and Westwood Professional Services, Inc. By using the MnDOT contract, federal highway funds pay 80% of the costs of the investigations.

The original agreement was approved by the County Board at its September 26, 2023, meeting. The County requested an amendment to the construction limits which requires additional survey for archaeology and architecture/history. There is no change to the scope or the budget, it is only to amend the contract for additional time to allow the Contractor to complete all duties required.

Attachments:

Resolution
Amendment Number 1 to MnDOT Contract No. 1053976

RESOLUTION AUTHORIZING EXECUTION OF

AMENDMENT NUMBER 1 TO MNDOT CONTRACT NO. 1053976

WHEREAS, The Minnesota Department of Transportation has a contract with Westwood Professional Services, Inc.("Contractor") identified as MnDOT Contract Number 1053976 ("Original Contract") to complete Phase I and Phase II Architecture-History and Archaeological Investigations for the East Side Corridor (referred to as the CSAH 8 Realignment in the Original Contract); and

WHEREAS, the County has requested an amendment of the construction limits which requires additional survey for archaeology and architecture-history, and

WHEREAS, the State and Contractor are willing to amend the original contract.

NOW THEREFORE, BE IT RESOLVED by the County Board of Commissioners of Steele County, Minnesota:

That the County of Steele hereby approves Amendment Number 1 to MnDOT Contract No. 1053976 with the State of Minnesota, acting through its Commissioner of Transportation, and Westwood Professional Services, Inc.

BE IT FURTHER RESOLVED, the Chairman and the Administrator are hereby authorized and directed for and on behalf of the County to execute and enter into the amendment to the contract with the Commissioner of Transportation prescribing the terms and conditions of said Phase I and II Architecture-History and Archaeological Investigations as set forth and contained in "Amendment Number 1 to Minnesota Department of Transportation Professional and Technical Services Contract No. 1053976", a copy of which said amendment was before the County Board and which is made a part hereof by reference.

STEELE COUNTY
BOARD OF COMMISSIONERS

_____
Jim Abbe, Chair

CERTIFICATION

STATE OF MINNESOTA
COUNTY OF STEELE

Comment #222

ESC EAW Comment #27

Omission of Federal Undertaking Analysis Undermines the Integrity of the Environmental Review

This comment is submitted on behalf of multiple residents directly affected by the East Side Corridor project. It reflects shared concerns regarding the procedural integrity of the Environmental Assessment Worksheet (EAW) and compliance with state and federal environmental law.

The EAW fails to disclose, analyze, or integrate the project's federal undertaking status, despite clear documentation in the administrative record confirming federal involvement. This omission materially undermines the public's ability to participate meaningfully in environmental review and constitutes a fatal procedural defect under MEPA.

Federal Undertaking Is Not Limited to Historic Review and Is Not Negated by Funding Changes

> ***"Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license, or approval."***
> *— 36 C.F.R. § 800.16(y)*

The County may argue that the federal undertaking determination applies only for historic purposes or that removal of federal construction funding eliminates federal involvement. Neither position is supported by federal law or by the project record.

An undertaking is defined broadly to include projects carried out under federal jurisdiction, projects receiving federal financial assistance, and projects requiring a federal permit, license, or approval. Federal funding is not the sole basis for undertaking status, and changes in funding do not eliminate federal jurisdiction or approval requirements once they apply.

Moreover, MnDOT's Cultural Resources Unit expressly determined that the project constitutes a federal undertaking **for both the Federal Highway Administration and the U.S. Army Corps of Engineers**, agencies with independent federal environmental jurisdiction beyond historic preservation. Section 106 applies because the project is a federal undertaking; it does not limit federal involvement to historic resources alone.

In addition to the $3.96M in federal funds that was removed from this project to avoid mitigations, the project has received **federal financial assistance**, including use of **CRRSAA** funds for project-related planning, engineering, and/or environmental studies, as documented in public meeting agendas and records. Federal financial assistance for any phase of a project—including studies or planning—constitutes federal involvement and may not be segmented from later project phases to avoid federal environmental compliance. The use of CARES Act funds independently satisfies the federal financial assistance prong of **36 C.F.R. § 800.16(y)** and

further confirms federal undertaking status regardless of subsequent changes in construction funding sources.

Accordingly, the EAW's failure to include federal analyses related to **noise, farmland conversion, water and floodplain impacts, and railroad infrastructure** cannot be excused by characterizing the undertaking as "historic-only" or by citing removal of federal funds. Federal undertaking status triggers federal environmental compliance obligations that must be disclosed and analyzed as part of the environmental review.

Pattern of Funding Manipulation to Avoid Federal Mitigation

The administrative record shows that beginning in **April–May 2024**, Steele County, the City of Owatonna, and WSB discussed removal of federal funding from the project for the stated purpose of avoiding federal noise mitigation requirements, including construction of a noise wall. These discussions occurred outside the environmental review process and prior to public disclosure.

In **March and April 2025**, these discussions translated into action, with County staff initiating steps to move federal funds off the project following residents' public announcement of oversight activities. At the same time, misleading public narratives were advanced blaming residents for project delays. Federal funds were not formally removed from the project until **May 2025**, more than a month after MnDOT's CRU determined that the project constituted a federal undertaking.

These actions were never disclosed or analyzed in the EAW. These steps were taken to avoid the federal mitigations residents were advocating for and done so without a documented vote of approval from the county commissioners.

Federal Undertaking Determinations Excluded from Public Analysis

On **April 1, 2025**, MnDOT's Cultural Resources Unit, acting on behalf of FHWA, determined that the East Side Corridor is a **federal undertaking** for purposes of Section 106. That determination was later reaffirmed multiple times in **July 2025**. These determinations are included in the EAW attachments.

However, the EAW's narrative does not:

- Identify the project as a federal undertaking;
- Explain the implications of federal control or approval;
- Analyze how federal involvement affects mitigation, alternatives, or timing; or
- Integrate federal environmental obligations into the MEPA review framework.

By relegating the federal undertaking to attachments without analysis or supporting documentation, the EAW obscures the true nature of the project and deprives the public of meaningful notice and participation.

Predetermination and Public Harm

While federal obligations were known and unresolved, the County continued to advance the project, narrow options, and represent outcomes as predetermined. These actions occurred during a period of governance instability, including a prolonged absence of a County Engineer.

Collectively, these actions demonstrate predetermination and irreversible commitment of resources prior to completion of lawful environmental review without proper oversight, in direct conflict with MEPA's procedural safeguards and Minnesota State statues regarding County Highway Engineers.

Conclusion and Requested Action

Because the federal undertaking affects applicable mitigation requirements, the range of alternatives, and the legality of proceeding without further review, the EAW cannot lawfully support a Finding of No Significant Impact.

Accordingly, residents request that the Responsible Governmental Unit:

1. Fully disclose and analyze the project's federal undertaking status;
2. Address the environmental and procedural consequences of funding maneuvers intended to avoid federal mitigation obligations; and
3. Require preparation of an Environmental Impact Statement (EIS), or suspend further commitments until a legally adequate, integrated environmental review is completed.

Owatonna East Side Corridor Resident
OwatonnaEastSideCorridor@gmail.com

Comment #223

ESC EAW Comments #9

Supplemental Comment – Predetermination and Alternatives Bias

Throughout the planning process for the East Side Corridor, multiple statements by elected officials and project staff demonstrate that a specific alignment was anticipated or treated as a foregone conclusion prior to completion of environmental review. These statements are relevant to assessing whether the Environmental Assessment Worksheet (EAW) reflects a neutral evaluation of alternatives as required under MEPA.

In **December 2022**, a city councilmember told residents, *"A road is going there whether we like it or not. That ship has sailed."* Following that meeting, the same official emailed project staff stating, *"I think I have convinced them a road is going there."*

As early as **2022**, then–City Council President and Ward 2 council member Greg Schultz told residents on multiple occasions that he was "in favor of this road and that location."

On **July 21, 2022**, then-Assistant County Engineer Paul Sponholz stated during the first public open house that **Alternative 3 was likely the outcome** of the process and that the county wasn't obligated to offer any mitigations. On **May 26, 2023**, he told residents that all alternatives were still under consideration.

However, on **May 31, 2023**—**five days later**—a single alignment was presented to the public, despite prior assurances that alternatives had not been narrowed. This sequence of statements and actions is inconsistent with a good-faith alternatives evaluation.

In **February of 2024** a city council member told a group of residents "Oh good you're not opposed to *a* road there, just this road. Because I think there is going to an a road of some kind there."

In **April 2025**, the County Administrator told residents that the township was effectively dictating the road's location due to planned annexation, further reinforcing that the alignment decision had been made outside the environmental review process.

Statements indicating that:

- a specific alignment was already favored,
- a road was inevitable regardless of environmental review, and
- alternatives were presented as still open when they were not,

demonstrate **predetermination and alternatives bias**. MEPA requires that alternatives be evaluated neutrally and that environmental review inform decision-making, not merely justify decisions already made.

For these reasons, the EAW does not provide a reliable alternatives analysis and cannot support a Finding of No Significant Impact. Preparation of a full Environmental Impact Statement (EIS) is required.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #224

ESC EAW Comments #35

Flawed Foundation, Predetermination, and Inadequate Alternatives Analysis

This comment is submitted to document material deficiencies in the Environmental Assessment Worksheet (EAW) for the East Side Corridor project that undermine the integrity of the environmental review and render the document inadequate under the Minnesota Environmental Policy Act (MEPA). Specifically, the EAW rests on a flawed analytical foundation due to inconsistent treatment of residential impacts and condemnation costs across alternatives, resulting in a biased comparison and predetermination of the preferred alignment.

The alternatives analysis relied upon by the EAW incorporates data from the project's federal memorandum. As the Responsible Governmental Unit (RGU), Steele County is responsible for the accuracy, completeness, and consistency of the information adopted and relied upon in environmental review, regardless of the original source.

When alternatives were evaluated and eliminated based on cost, **Alternative 2**, which ran adjacent to Hill Drive, explicitly included residential condemnation in its cost analysis. These residential acquisition costs were factored into the comparative evaluation and contributed to the elimination of that alternative.

In contrast, when **Alternative 3** was evaluated, residential condemnation costs were **not included**, despite the alignment running closer to existing homes in the North Country neighborhood and presenting comparable or greater residential proximity impacts. In both cases, the roadway was located adjacent to residential properties, yet only one alternative accounted for the costs and impacts of residential acquisition.

This unequal treatment of residential impacts and condemnation costs constitutes a material inconsistency in methodology. By selectively including residential acquisition costs for some alternatives while excluding them for others, the alternatives analysis presented in the federal memorandum—and adopted by the EAW—skews the comparative evaluation and biases the outcome. Such inconsistency prevents meaningful comparison of alternatives and undermines the reliability of the conclusions drawn.

MEPA requires that alternatives be evaluated using consistent assumptions and analytical frameworks so that decision-makers and the public can meaningfully assess environmental consequences and reasonable options. The selective inclusion and exclusion of residential impacts violates this requirement and reflects predetermination rather than objective environmental review.

Because the EAW is built on this flawed foundation, it understates the true impacts of Alternative 3 on existing neighborhoods, obscures reasonable avoidance alternatives, and fails to disclose foreseeable environmental consequences. These deficiencies cannot be cured through post-hoc explanation or mitigation commitments.

An Environmental Impact Statement (EIS) is therefore required to correct the record, apply a consistent and transparent methodology across all alternatives, fully account for residential proximity and condemnation impacts, evaluate cumulative and foreseeable future effects, and assess reasonable avoidance alternatives before irreversible commitments are made.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #225

ESC EAW Comments #29

Predetermination and Prejudicing of Alternatives – Minn. R. 4410.3100

Improper Predetermination and Prejudicing of Alternatives

This comment is being submitted to document a clear violation of Minn. R. 4410.3100 arising from Steele County's approval and execution of implementation-level engineering actions for the East Side Corridor while environmental review was still ongoing.

Minn. R. 4410.3100 expressly prohibits a Responsible Governmental Unit (RGU) from taking actions that would materially prejudice the consideration of alternatives or mitigation measures before environmental review is completed. The actions approved by Steele County on May 13, 2025, violate both the letter and intent of this rule.

Additionally, residents warned the county before a vote was taken.

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1. Approval of a "Preferred Option" Before Completion of Environmental Review

On May 2, 2025, WSB submitted Contract Amendment No. 2 for the East Side Corridor. That amendment repeatedly and explicitly identifies a **"preferred option"** and **"preferred corridor,"** stating that:

- *"The right of way limits have been determined for the preferred option,"* and
- The scope includes base work *"for the preferred corridor."*

The determination of right-of-way limits for a single corridor constitutes selection, not analysis. At that point, alternatives are no longer being neutrally evaluated — they are being excluded.

This action alone materially prejudices alternatives in violation of Minn. R. 4410.3100.

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2. Authorization of Implementation-Level Design and Right-of-Way Work

The May 2 amendment — approved by the County Board on May 13 — authorizes and funds extensive implementation-level work tied exclusively to the preferred corridor, including:

- Right-of-way base mapping and title work
- Roundabout mitigation design and intersection engineering
- Right of Way mapping
- Repeat noise analysis driven by selected mitigation measures to justify roundabouts
- Bridge design, hydraulic, and floodplain design
- Soil borings to support bridge foundations

These are not preliminary or conceptual activities. They are engineering actions undertaken to advance construction of a specific alignment.

Financial commitment to these tasks — totaling over $200,000 in new expenditures and revising the contract total to over $635,000 — further locks in the chosen corridor and forecloses meaningful consideration of alternatives.

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3. Mitigation-Driven Reanalysis Demonstrates Predetermination

The amendment explicitly states that noise impacts were reanalyzed **because roundabouts were selected** and that:

- *"The lower speed and character of the corridor resulted in the need to re-analyze the noise impact."*

This is not environmental review guiding design. It is design driving environmental analysis — precisely what Minn. R. 4410.3100 prohibits.

Mitigation measures may not be engineered first and then used to justify a preselected alternative while other corridors remain unstudied or dismissed.

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4. Timing and Procedural Irregularity

These actions occurred while environmental review was still active and, notably, within days of the County Engineer's resignation notice. Regardless of personnel changes, the RGU remains legally obligated to maintain independent judgment, procedural integrity, and compliance with environmental review rules.

Locking in a preferred corridor, right-of-way limits, and bridge design during this period further underscores the absence of good-faith alternatives analysis.

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5. County Proceeded Despite Advance Warnings from Residents

Prior to the May 13, 2025 County Board vote authorizing the WSB contract amendment, residents explicitly warned Steele County, in writing and public comment, that approving implementation-level engineering actions before completion of environmental review would violate Minn. R. 4410.3100 by prejudicing alternatives.

These warnings were provided **before** the vote was taken and placed the County on notice that:

- the amendment selected and advanced a preferred corridor,
- right-of-way limits had been fixed,
- design and mitigation work was being authorized, and
- such actions were prohibited during ongoing environmental review.

Despite these warnings, the County proceeded with the vote and authorized the amendment without pausing, deferring, or conditioning the action on completion of environmental review.

This is not a case of inadvertent error, misunderstanding, or reliance on incomplete information. The record reflects that Steele County **knowingly proceeded after concerns were raised**, further undermining any claim of good-faith compliance with MEPA and its implementing rules.

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6. Consequences

Because Steele County approved and funded actions that materially prejudiced alternatives prior to completion of environmental review, the Environmental Assessment Worksheet is **legally deficient.**

This violation cannot be cured by continuing the EAW process. Once predetermination occurs, the integrity of the review is compromised.

Accordingly, this record supports:

- rejection or invalidation of the current EAW, and
- preparation of a full Environmental Impact Statement (EIS) with **independent** oversight.

Conclusion

An EAW must inform decision-making — not ratify decisions already made. The May 2, 2025 WSB amendment and its approval on May 13, 2025 demonstrate that Steele County committed to a preferred corridor and advanced its implementation before environmental review was complete, in direct violation of Minn. R. 4410.3100.

This comment is submitted for inclusion in the official EAW record.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

EXHIBIT 1

STEELE COUNTY BOARD AGENDA

Administration Center - 630 Florence Avenue – Owatonna, MN 55060

Steele County's Mission:
Driven to deliver quality services in a respectful and fiscally responsible way.

TUESDAY, MAY 13, 2025 at 5:00 PM
County Boardroom, Steele County Administration Center

Persons with background material for agenda items are asked to provide them to the Administrator's Office 5 days prior to the meeting date so that the material can be linked to the online agenda. If handouts at the Board meeting are necessary, please bring enough copies for the Board, county staff, the press and the public. Generally, 15 copies should be sufficient.

Agenda

1. Call to Order

2. Pledge of Allegiance

3. Approve Agenda

Presentation

4. UBS Financial Services Presentation (pg.5)
   – Jack Samuels, Senior Wealth Strategy Associate

5. ANR Educator Report (pg. 16)
   – Ryan Lerman, Steele/Rice Extension Educator

Public Comment

Those wishing to speak must state their name and address for the record after they are acknowledged by the Board Chair. Each person will be limited to two (2) minutes to make his/her remarks.

Speakers will address all comments to the Board as a whole and not one individual commissioner. The Board may not take action on an item presented during the Public Comment period, unless the item is already on the agenda for action. When appropriate, the Board may refer inquiries and items brought up during the Public Comment period to the County Administrator for follow-up.

Correspondence

6. Southern Minnesota Tourism Association Letter (pg. 19)

Consent Agenda - *Items listed on the Consent Agenda are considered routine and non-controversial by the County Board. There will be no separate discussion of these items unless requested by a member of the County Board.*

7. Approve April 16, 2025 Special Budget Work Session Minutes (pg. 20)
8. Approve April 22, 2025 Board Minutes (pg. 21)
9. Approve April 22, 2025 Board Work Session Minutes (pg. 29)
10. Approve Bills (pg. 31)
11. Approve Personnel Report (pg. 64)
12. Approve the On-Sale Beer License for Holy Trinity Catholic Church of Litomysl (pg. 65)
13. Adopt a Proclamation for the "National Public Works Week" (pg. 66)
14. Approve a temporary contract for a waiver and care coordinator position (pg. 68)
15. Approve a Consultant Agreement with Teya Dahl. (pg. 72)
16. Approve 2024 Feedlot Officer Annual Report and authorize the Chair to sign (pg. 76)
17. Adopt Amended Resolution 2025-003A designating UBS as Steele County's depository and authorize the persons stated to sign orders (pg. 91)
18. Adopt Amended Resolution 2025-005A Granting Annual Authority to the Finance Director to Designate Depositories and Authorize others to Conduct Banking Transactions. (pg. 93)
19. Adopt Amended Resolution 2025-004A approving the revised 2025 EFT Authorization due to personnel changes. (pg. 96)

General Agenda

20. May Anniversary Report (pg. 99)
21. Approve the sale of CCA Furniture to Choice Technical Academy in an amount of $6,000.00 and authorize Community Correction Director to sign MOU. (pg. 100)
22. Adopt a Resolution 2025-025 Amending CUP #302, Minnesota Paving and Materials and Festal Farms removing three parcels. (pg. 104)
23. Approve Agreement Amendment with WHKS & Company to complete final design for the

CSAH 2/CR 180, CSAH 43, and CR 171 Intersection Improvement and authorize the County Engineer to sign. (pg. 113)

24. Adopt Resolution requesting MnDOT to perform a speed study on CSAH 46 (CSAH 15 to MN 30) (pg. 121)
25. Approve an Amendment with WSB for Engineering Services for CSAH 48 and 18th Street SE Roundabout and authorize the County Engineer to sign. (pg. 125)
26. Approve/Adopt Agreements and easements with CPKC railroad for the work necessary to relocate and improve the SE 18th Street Rail Crossing
    a. Approve the negotiated settlement for $26,000 for the acquisition of an easement over, under, across and through a parcel of land owned by the CPKC railroad for SE 18th Street. (pg. 128)
    b. Approve Maintenance Agreement with CPKC railroad for the work necessary to relocate and improve the SE 18th Street Rail Crossing (pg. 144)
    c. Adopt Resolution 2025-027 to approve agreement with CPKC railroad and State of Minnesota for the installation of crossing signals and gates at the SE 18th Street rail crossing. (pg. 225)
27. Approve Amendment with WSB for Preliminary Engineering Services for East Side Corridor Project and Authorize the County Engineer to sign the Amendment. (pg. 239)
28. Award a contract for the 2025 CSAH 3 Resurfacing project to Crane Creek Asphalt in the amount of $586,659.97. (pg. 243)
29. Approve Disposal of Veteran Services Van (pg. 244)

County Board Work Session – Tuesday, May 13, 2025

30. Action Items

Internal Central Services Committee – Tuesday, May 6, 2025

31. Approve Administration and Annex Building hour change (pg. 249)

Information Items

32. Internal Central Services Committee Minutes (pg. 251)
33. Land Use and Records Committee Minutes (pg. 253)

Commissioner Reports:

Next Meeting Notices:

Public Safety & Health Committee – **Tuesday, May 20th at 8 a.m. in the Boardroom**

County Board Work Session – **Tuesday, May 27th at 4 p.m. in the Boardroom**

County Board Meeting – **Tuesday, May 27th at 5 p.m. in the Boardroom**

Closed Session:

The Board will be going into closed session for the purpose of labor negotiations strategy, per MN Statute Section 179A.01 & Section 13D.03

Motion to go into closed session
Discussion
Motion to end closed session
Action item (if necessary)

Closed Session:

The Board will be going into closed session for the purpose of discussing pending litigation - attorney/client privilege, pursuant to Minn. Stat. § 13D.05, Subd. 3(b)

Motion to go into closed session
Discussion
Motion to end closed session
Action item (if necessary)

Adjourn

Disclaimer: This agenda has been prepared to provide information regarding an upcoming meeting of the Steele County Board of Commissioners. This document does not claim to be complete and is subject to change.

Memorandum

To: Paul Sponholz, Steele County

From: Andrew Plowman, WSB

Date: May 2, 2025

Re: East Side Corridor Project
WSB Project No. 019850-000
Contract Amendment No. 2

Pursuant to our discussions, WSB respectfully submits this amendment request for additional design services associated with the following tasks:

- Additional Project Management and General Coordination
- Right of Way Base Mapping
- Roundabout Design/Mitigation Measures
- Noise Analysis based on Mitigation Measures
- CATEX Document
- Soil Boring near Maple Creek
- Hydraulic/Floodplain Design
- Bridge Design

The revised contract total amount is $426,044. WSB respectfully requests compensation for these additional services in the not-to-exceed amount of $209,235, resulting in a revised contract total of $635,279, as summarized below:

If this Proposal is acceptable, please issue the appropriate Amendment incorporating this letter for our review and signature.

We thank you for the opportunity to submit this Proposal and look forward to continuing to with you on this Project. If you have any questions, please let me know.

The following outlines the request for additional fee and details the scope of services for the project:

Additional Project Management and General Coordination

The project management and general coordination for the project includes additional coordination with agencies, additional project management team meetings and scheduling activities.

The total cost for this task is $16,000, which is based on 80 hours of time with an average cost per hour of $200/hr.

Right of Way Base Mapping

The right of way limits have been determined for the preferred option. Given the right of way process requires significant duration, WSB proposes to start the process by compiling the title

701 XENIA AVENUE S | SUITE 300 | MINNEAPOLIS, MN | 55416 | 763.541.4800 | WSBENG.COM

work and right of way base files. This scope would include the base work for the preferred corridor.

The total cost for this task is $32,400, which is based on 180 hours of time with an average cost per hour of $180/hr.

In addition, the expense to obtain the title reports would be included in this task, which would assume 20 parcels at $500/parcel. $10,000.

Roundabout Design/Mitigation Measures

It was determined that roundabouts would be considered at the intersections of 29th Avenue and Rose Street, Dane Avenue, 26th Street and 26th Street and Kenyon Road. This includes the design, analysis, performance checks and grading of 4 roundabouts that were previously not considered. This will not include the final design component or landscaping. We will include an additional fee in the 60% design task.

The total cost for this task is $37,800, which is based on 180 hours of time with an average cost per hour of $210/hr.

Noise Analysis based on Mitigation Measures

Roundabouts have been considered as mitigation measures for the concern with speed and operation of the corridor. This resulted in lower speeds for certain portions of the corridor that indicated noise walls may be feasible and cost effective. The lower speed and character of the corridor resulted in the need to re-analyze the noise impact.

The total cost for this task is $15,120, which is based on 84 hours of time with an average cost per hour of $180/hr.

CATEX Document

For the original design, it was assumed an EA/EAW would be required. Amendment 1 indicated the additional work required from switching the type of document and for the added effort. However, that did not include the need for completing two documents. Although they are similar in nature, they do have differences that require additional work and coordination.

The total cost for this task is $63,875, which is based on 365 hours of time with an average cost per hour of $175/hr.

Soil Boring near Maple Creek

The County was able to obtain a right of entry permit from the owner of the property at 9153 Co. Road 3, Owatonna, to complete a soil boring near Maple Creek. This will allow for preliminary design of the footings and abutments for the bridge across Maple Creek. It should be noted that additional borings will be necessary, including on the north side.

The total cost for this task is $11,000, which is based on 32 hours of crew time at $250/hr, and $3,000 of laboratory testing and reporting effort.

Hydraulic/Floodplain Design

The initial bridge design was based on hydraulic and floodplain analysis. In addition to the design, coordination has occurred with the area drainage engineer and the DNR. Some of this effort was included in the original design, but certain investigations were outside the scope, such as impact to the floodplain and how to mitigate and design the bridge.

The total cost for this task is $9,000, which is based on 40 hours of time with an average cost per hour of $225/hr.

Bridge Design

As part of the EAW and CATEX, initial bridge design was required. This included the design of the typical section, profile and initial beam design. A substantial final design will also be required for the project, which includes coordination with the bridge office and plan production.

The total cost for this task is $14,040, which is based on 54 hours of time with an average cost per hour of $260/hr.

The revised contract total amount is $426,044. WSB respectfully requests compensation for these additional services in the not-to-exceed amount of $209,235, resulting in a revised contract total of $635,279

Sincerely,

Andrew Plowman, P.E.
Sr. Project Manager

ACCEPTANCE:

Signature: _____

Title: _____

Date: _____

Gmail

Urgent Request: Postpone Major Engineering Decisions Until New Engineer Is in Place

[redacted]Sennott <matt.sennott@gmail.com> Sat, May 10, 2025 at 1:02 PM
To: greg.krueger@co.steele.mn.us, "Glynn, John" <john.glynn@steelecountymn.gov>, "Abbe, Jim" <Jim.Abbe@steelecountymn.gov>, Joshua.prokopec@steelecountymn.gov, "Brady, James" <James.Brady@steelecountymn.gov>

It has come to the public's attention—through Cottage Grove City Council materials—that Steele County Engineer Paul Sponholz has accepted a new position and will soon be leaving his post. Yet, there has been no formal communication from the County acknowledging this leadership transition. Despite this, several major engineering decisions—each carrying long-term consequences and significant financial commitments—remain on the May 13th agenda, including Item #27 regarding the East Side Corridor (ESC).

Moving forward with amendments and new contracts during the final days of an outgoing engineer's tenure—without public transparency, independent review, or accountability from incoming leadership—raises serious red flags. The proposed amendment from WSB for the ESC project is especially troubling, given the project's history of controversy, public concern, and skyrocketing costs.

Equally concerning are apparent discrepancies in how funding changes have been presented to the public. Inaccurate or misleading representations erode trust and call into question the reliability of the information used to justify these decisions. The public deserves clarity—not confusion—on how their tax dollars are being spent.

We are also alarmed by continued scope creep. County Administrator Renae Fry, who has a known working relationship with WSB, recently acknowledged that costs could increase two to three times as the project progresses. This prediction is already proving accurate, with estimates now tripling those in the original RFP. This pattern of unchecked cost escalation demands a pause and a reset—not a rush to commit further resources.

Approving these items now would effectively tie the hands of the incoming County Engineer, eliminating their ability to evaluate, adjust, or redirect these projects in line with current best practices or the public's interest. It would also send a damaging signal about the County's priorities—favoring expedience over transparency, and legacy deals over leadership accountability.

I urge the Board to act responsibly and delay action on Items #23, #25, #26, and #27 until a new County Engineer is in place and has had the opportunity to conduct a full, independent review. Anything less places the County—and its taxpayers—at unnecessary risk.

Respectfully,
[redacted]

Gmail

Formal Objection to Agenda Item Granting Expanded Authority to Departing County Engineer Paul Sponholz

[redacted] Mon, May 12, 2025 at 2:00 PM
To: Jim.Abbe@steelecountymn.gov, john.glynn@steelecountymn.gov, James.Brady@steelecountymn.gov, joshua.prokopec@steelecountymn.gov, Greg.Krueger@steelecountymn.gov, [redacted]
[redacted]

Subject: Formal Objection to Agenda Item Granting Expanded Authority to Departing County Engineer Paul Sponholz

To: Steele County Board of Commissioners
From: [redacted]
Date: May 12, 2025

Dear Commissioners,

I am writing to formally object to the proposed agenda items that would grant departing County Engineer Paul Sponholz expanded authority to sign and approve substantial engineering contracts or move projects, such as the East Side Corridor (ESC), into advanced phases before critical environmental review and transparency requirements are completed.

This objection is based on the following concerns:

1. Mr. Sponholz is a departing employee.
Granting extended or discretionary authority to an outgoing staff member—particularly one facing numerous public concerns—risks obligating the County to long-term financial and legal commitments that may not reflect the interests of future leadership or the public.

2. There are unresolved allegations of misconduct.
Multiple residents have raised concerns, including reports that Mr. Sponholz was allegedly involved in a workplace incident involving physical contact with a subordinate, staff departures tied to alleged hostile workplace conditions, and his active role in recent decisions that have eroded public trust. These matters have not been fully addressed.

3. Approving this authority circumvents proper oversight.
This request appears to bypass standard board approval processes for major decisions. Granting contract-signing or design authority of potentially hundreds of thousands of dollars just prior to departure—without public notice or formal evaluation—undermines fiscal responsibility.

4. It could tie the hands of the next engineer.
Authorizing pre-emptive decisions on projects like the ESC, especially before required environmental studies are complete, would limit the ability of any incoming engineer to act in the best interest of the County and the public.

5. This action lacks transparency and invites further mistrust.
County residents have submitted formal concerns, data requests, and questions regarding ESC and other infrastructure processes. Many of those remain unacknowledged or unaddressed. Moving forward without proper public process would further diminish trust in local government.

6. Risk of railroad liability being rushed through without public input.
Internal records and public statements show unresolved issues with the 18th Street railroad crossing. On April 8, 2025, Mr. Sponholz stated that after 5 years of negotiations the County was "at square one", yet it now appears he is preparing to finalize terms before departing. Emails confirm the roundabout sits only 150 feet from the crossing—50 feet short of required spacing—prompting the railroad to reject liability due to proximity and lack of involvement in the project's design. Despite this, Steele County did not enter the federal Section 130 program, which could have helped absorb long-term liability. Residents are deeply concerned that these final agreements may commit the County to future risk without public oversight or accountability. Any hasty deal could have serious financial implications and should be carefully evaluated by future leadership—not rushed at the last minute.

Request:
I respectfully request that the Board:

- **Table or remove the agenda item** authorizing expanded authority for Mr. Sponholz until full reviews can be conducted.
- **Suspend discretionary engineering decisions** above a set threshold until a new County Engineer is hired and proper public processes are restored.
- **Publicly address** concerns regarding decision-making power, transparency, and transition procedures for the engineering department.

Additional Request:

In light of the serious concerns raised, I also respectfully request that the Board:

- **Suspend all decision-making authority and further advancement of the East Side Corridor (ESC) and the 18th Street Roundabout projects** until full investigations can be completed into the processes, oversight, and decision-making surrounding these projects.

This pause is necessary to ensure transparency, safeguard taxpayer resources, and uphold public trust, especially given unresolved questions related to public input, regulatory compliance, potential conflicts of interest, and project coordination with the railroad.

Thank you for your time and for your commitment to responsible, accountable governance.

Sincerely,
Ross [redacted]

Gmail

ESC Project – Urgent Concerns Regarding Oversight, Cost, and Process Integrity

[redacted] Tue, May 13, 2025 at 1:24 AM
To: "Abbe, Jim" <Jim.Abbe@steelecountymn.gov>, Josh Prokopec [redacted], "Glynn, John" <john.glynn@steelecountymn.gov>, "Brady, James" <James.Brady@steelecountymn.gov>, "Krueger, Greg" <Greg.Krueger@steelecountymn.gov>

Dear Commissioners,

As I read the agenda for tomorrow's meeting, I feel compelled to raise some serious concerns regarding the ESC project. I am not reaching out to stall the project—I understand the desire to move forward—but as a taxpayer and engaged resident, I believe the process unfolding is deeply flawed, deserves your urgent attention, and warrants further investigation.

I often feel dismissed as unknowledgeable—perhaps due to preconceived notions some elected officials may hold—but I've spent the past three years researching this project, processes, and laws. I've even considered pursuing a master's degree in civil engineering, wondering if that would finally be enough to be heard. But the reality is, I haven't had the time to take on graduate studies while also working to protect my family and neighborhood, despite being more than qualified. Over the past 3 years, I haven't raised concerns to discredit anyone; I've done so out of a commitment to process integrity and fiscal responsibility. Two minutes at a podium can't begin to cover the depth or complexity of what's unfolding here. I've asked for the opportunity to have real, productive conversations. That remains my hope.

Leadership Transition Raises Red Flags

My first concern is that these additional charges are surfacing just as your county engineer is exiting. In most professional settings, when someone submits their resignation, they're not allowed to make final decisions that will have long-term impacts. In many settings, resigning staff are immediately relieved of their responsibilities to prevent conflicts of interest or rushed decisions. While I understand wanting to "tie up loose ends," those ends shouldn't be this loose—or costly. This timing alone is a red flag and warrants scrutiny.

Concerns Over Transparency and Retaliation

I have hesitated to email previously, uncertain about who monitors commissioner communications. However, based on my past experiences with County Administrator Renae Fry, I am genuinely concerned about further potential retaliation and intimidation. On February 4, 2025, both Robert Jarrett and Renae Fry attempted to block all constituent access to commissioners and county staff. When that approach failed because you can't do that, I was cut off under the false and unfounded claim that I intended to sue the county. As my elected officials, I expect you to investigate this matter, stand up for your constituents, and advocate on their behalf. On both February 11, 2025, and April 8, 2025, Fry created hostile environments, raising her voice and using intimidation tactics to interrupt my conversations with commissioners. Residents deserve the right to engage with their local government without fear of being silenced. Due to the lack of direct contact, I have no other option but to send this email and hope that you are reading it. I assured Commissioner Krueger early in this process that I would lead my group respectfully, and he assured me that we would be guaranteed our democratic rights. Unfortunately, that promise has been stripped from us, despite efforts to uphold my end of the agreement.

WSB Ties and History of Cost Increases

I also have concerns about Fry's long standing relationship with WSB, dating back to her time as city administrator in North Branch. Troubling allegations emerge when you look into these ties. I raised concerns about WSB's fee increases on April 8, 2025, when Fry aggressively told me to expect 'two to three more' such significant cost hikes, despite not being able to explain the previous increases. This is deeply concerning, especially given that WSB wasn't the lowest bidder and initially stated they could complete the project for under $300K! Additionally, the RFPs and records of discussion are missing from meeting agendas and minutes, raising concerns about the transparency of how WSB was selected in the first place.

Last Year's Study Change and Its Implications

The cost increases in September were attributed to study scope changes in meetings, which, at the time, seemed reasonable. However, internal emails later revealed that WSB's cost increases were to study alternative 3B and 29th Ave., but our engineer instructed them to remove reference to 3B. That change increased costs without transparency for officials and the public. Why are we paying to study multiple alternatives when the process calls for only one? Why not focus on avoidance, as studies recommended? Why are we trying to force the ESC in a substandard right of way 17 feet from homes when faster, more costifeective options that we've already studied exsit? Who holds the power and stands to gain?

Additional Noise Analysis

Noise analysis is being completed to evaluate noise impacts for various alternatives, instead of just one build alternative. This includes background data for the various alternatives and running multiple models.

Design Work Without Environmental Approval

WSB's new charges are primarily for *design* work—before the environmental documents are finalized. For years we've asked when it's time to discuss mitigations, only to be told "not yet." And yet, now we're paying WSB to design mitigations behind closed doors, bypassing both government oversight and public input. This contradicts the entire premise of the environmental study process. Design should follow—not precede—the environmental review. Where is the public involvement? Where is the transparency? When can we discuss mitigations and avoidance?

Pursuant to our discussions, WSB respectfully submits this amendment request for additional design services associated with the following tasks:

- Additional Project Management and General Coordination
- Right of Way Base Mapping
- Roundabout Design/Mitigation Measures
- Noise Analysis based on Mitigation Measures
- CATEX Document
- Soil Boring near Maple Creek
- Hydraulic/Floodplain Design
- Bridge Design

The revised contract total amount is $426,044. WSB respectfully requests compensation for these additional services in the not-to-exceed amount of $209,235, resulting in a revised contract total of $635,279, as summarized below:

Scope Creep

This project has experienced significant scope creep—both in cost and complexity. What began as a relatively modest proposal has ballooned into a $30 million undertaking, with continued cost increases predicted. This growth has not been driven by public input or environmental necessity, but by internal decisions made without sufficient oversight or transparency. Design features like roundabouts,urban roadway, boulevards, curb and gutter, noise walls, and bridge components are being inserted before final environmental documents are complete, bypassing standard processes. If scope creep is not checked, it will continue to inflate both the budget and the timeline, placing unnecessary financial strain on the county and its taxpayers.Who stands to benefit from this scope creep?

From: Sponholz, Paul
Sent: Tuesday, June 11, 2024 9:55 AM
To: Andrew Plowman
Subject: RE: ESC Intersection control

Andrew,

Thank you. All good things to think about as we start moving forward.

Another one I forgot to mention, we've been eyeing up is the intersection of CSAH 8/CSAH 77/CSAH 34 (Kenyon Rd/24th Ave/26th Street) for a potential future roundabout. While we are there reconstructing that intersection, we should evaluate that one as well. The south leg is skewed, has some sight line issues. And probably higher counts than the rest of the new road.

Cost will be a factor to consider in all of them. Certainly in the middle of a reconstruction project, not a significant addition to the overall costs, but something to consider nonetheless.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

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Federal Reports and CatEx Confusion

The new WSB line items include a CatEx report—despite the March 27, 2025 decision by the engineer to unilaterally remove federal funding. Why are we still paying for a federal study we're no longer required to complete? These charges appear to be *new* and outside of the contracted budget. Contracts of this nature generally require board approval when approaching budget thresholds. Given these are future costs being proposed, they must be questioned. The county engineer previously indicated both the EAW and CatEx were completed last February. So why are we being charged again?

CATEX Document

For the original design, it was assumed an EA/EAW would be required. Amendment 1 indicated the additional work required from switching the type of document and for the added effort. However, that did not include the need for completing two documents. Although they are similar in nature, they do have differences that require additional work and coordination.

The total cost for this task is $63,875, which is based on 365 hours of time with an average cost per hour of $175/hr.

Further, bridge design work listed as part of the CatEx is now irrelevant. There is no more CatEx without federal funds. And again—**why are we designing before we've completed environmental review?** You can't finalize a design if you don't know whether the project can be permitted. This is a clear process failure.

Bridge Design

As part of the EAW and CATEX, initial bridge design was required. This included the design of the typical section, profile and initial beam design. A substantial final design will also be required for the project, which includes coordination with the bridge office and plan production.

Roundabouts Before Review?

I don't object to roundabouts when justified—but this is a *design-stage* item. We are still in the **environmental stage**. WSB themselves admitted they don't know what future traffic counts will be and in order to justify roundabouts traffic counts have to reach a given threshold which this did not. So how can we justify the need for roundabouts—or any other major design features? Once again, decisions are **being made without public input,** and that undermines the entire point of a public process.

Roundabout Design/Mitigation Measures

It was determined that roundabouts would be considered at the intersections of 29th Avenue and Rose Street, Dane Avenue, 26th Street and 26th Street and Kenyon Road. This includes the design, analysis, performance checks and grading of 4 roundabouts that were previously not considered. This will not include the final design component or landscaping. We will include an additional fee in the 60% design task.

The total cost for this task is $37,800, which is based on 180 hours of time with an average cost per hour of $210/hr.

Noise Wall Games

How many times will noise studies be redone in an apparent effort to avoid building a noise wall that has already been deemed necessary? It has been clear from the beginning that residents near the proposed alignment will experience significant noise impacts—especially with a right of way as close as 17 feet from homes. WSB confirmed the cost of a noise wall at $2.3 million, which is exactly what residents had indicated for over a year.

When residents initiated inquiries into potential public data violations, federal funding was suddenly removed from the project—an action that appears intended to avoid triggering mandatory noise mitigation. Internal emails show this possibility was being discussed as early as April 2024.

So how is it that federal funds can be dropped to avoid mitigation obligations, while design work continues without public input or environmental review? If traffic counts were altered to justify roundabouts—triggering different noise profiles—those changes should be easily validated using models publicly available on MnDOT's website. And what is the likelihood that, this time, there will be no significant noise impacts just 17 feet from homes?

These actions don't add up. Something here demands closer scrutiny.

Noise Analysis based on Mitigation Measures

Roundabouts have been considered as mitigation measures for the concern with speed and operation of the corridor. This resulted in lower speeds for certain portions of the corridor that indicated noise walls may be feasible and cost effective. The lower speed and character of the corridor resulted in the need to re-analyze the noise impact.

The total cost for this task is $15,120, which is based on 84 hours of time with an average cost per hour of $180/hr.

Loss of Federal Funds and Future Eligibility

Equally concerning is the decision to remove federal funding from the project. This was a pivotal moment—not just because of the immediate financial impact, but because it undermines the credibility and integrity of the county in future federal grant processes. Federal funds come with strict environmental review requirements. By abandoning the federal track mid-process and continuing design work without proper compliance, the county has disqualified this project—and any similar future projects—from receiving federal funding. This decision carries long-term consequences that could severely limit Steele County's ability to access external infrastructure funding for years to come, and there was no recorded vote for this decision.

Political Influence and Misleading Information

I've also heard from Administrator Fry that the township is "overruling" the project. That's simply not true. The township cannot override state or federal environmental regulations, nor can it force annexation. The annexation agreement limits annual expansion to 65 acres of planned residential land. Fry's implication that 1000 acres will be annexed for this project is inconsistent with past annexation history and highly unlikely to be approved at the state level. In the last 50 years we have annexed 576 acres. The difference between 3B and 29th Ave is half a parcel if annexation was really a concern.

Time for Oversight, Not a Rush to Approve

This is not how this project should be proceeding. Rushing approval before the engineer's departure locks in design decisions before proper review, public input, or environmental clearance. After the EAW comment period, responses are required—yet we won't have an engineer in place to do that. The state or EQB could require further studies. Do we have

the resources and credibility to handle that if we continue down this rushed and opaque path? Why are we putting the cart before the horse and designing something that may not even be approved? The environmental process may indicate a better, cost-effective alternative that wouldn't require all these design features that WSB, not Steele County residents, benefit from.

Final Thoughts

This isn't about opposing the project—I want to see it succeed. But at nearly every step, we've encountered barriers that shouldn't exist in a well-managed public process. I'm raising these concerns because I believe the county is exposing itself—and taxpayers—to unnecessary risk and long-term liabilities.

There's no harm in pausing. What difference does it make if this is approved now, after the EAW comment period, or once the new county engineer has had time to properly review the project? There is no reason to rush major decisions before the current engineer departs. As commissioners, you are stewards of public funds and have the authority to approve this contract at any point.

But without a qualified engineer in place, how do we move forward responsibly? Approving this now risks giving WSB unchecked control over key design and project decisions—without the oversight taxpayers expect and deserve. We need an engineer to represent the county's interests, and with federal funds no longer in play, there is no external timetable pressuring an immediate decision. Delaying by a month or two won't hurt the project—but moving forward without proper oversight absolutely could.

It is entirely reasonable to take a step back and investigate the scope of these charges. In fact, I would urge you to consider an audit. Emails obtained from the city—despite the fact that many of our data requests remain unfulfilled—suggest that County Engineer Sponholz was concerned about how much information had reached the public—raising the question of whether that concern stemmed from a desire to prevent scrutiny of questionable or inappropriate actions. That alone warrants deeper scrutiny.

In most professional settings, an employee who resigns is not granted expanded authority on their way out the door. Yet here, the outgoing engineer is being given the power to shape design decisions that will impact the community for decades and lock this project in despite environmental reports not being finalized. Please consider whether that's truly in the county's best interest.

I raise these concerns not out of opposition, but because I care deeply about this community. I have a vested interest in the outcome—as a resident, taxpayer, and someone who believes we can still build an ESC that works for everyone. Thank you for reading this far. I believe we still have an opportunity to get this right, and I would welcome the chance to work together toward that goal.

I can only hope that at least one of you will have the courage to look into the concerns raised and help end the silence. And if not, perhaps have your lawyer contact mine—whenever someone lets me know who that is supposed to be.

Sincerely,
[redacted]

The legislature, recognizing the profound impact of human activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high density urbanization, industrial expansion, resources exploitation, and new and expanding technological advances and recognizing further the critical importance ***of restoring and maintaining environmental quality to the overall welfare and development of human beings****, declares that it is the continuing policy of the state government, in cooperation with federal and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance,* ***in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which human beings and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of the state's people.***

Re: Formal Objection to May 13, 2025 5pm Agenda Items Granting Additional Authority to County Engineer Paul Sponholz

Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com> Mon, May 12, 2025 at 8:45 PM

To: "Abbe, Jim" <Jim.Abbe@steelecountymn.gov>, "Glynn, John" <john.glynn@steelecountymn.gov>, "Brady, James" <James.Brady@steelecountymn.gov>, "Prokopec, Joshua" <joshua.prokopec@steelecountymn.gov>, "Krueger, Greg" <Greg.Krueger@steelecountymn.gov>

Correction: May 13, 2025 meeting Agenda Items (attached).

On Mon, May 12, 2025 at 4:21 PM Owatonna East Side Corridor <owatonnaeastsidecorridor@gmail.com> wrote:

> **To:** Steele County Board of Commissioners
> **From:** Owatonna East Side Corridor Residents
> **Date:** May 12, 2025
> **Re:** Formal Objection to May 13, 2025 5pm Agenda Items Granting Additional Authority to County Engineer Paul Sponholz
>
> ---
>
> **Dear Commissioners,**
>
> We are writing to formally object to any action that would grant outgoing County Engineer Paul Sponholz expanded or discretionary authority over engineering or financial decisions during his final weeks in this role. Several residents of the East Side Corridor (ESC) neighborhood have submitted comments regarding the relevant agenda item. However, due to the urgency and severity of the concerns, We respectfully request additional consideration through this formal communication.
>
> ---
>
> ## Core Concerns:
>
> **1. Timing & Transition Risk:**
> Mr. Sponholz has accepted a new position. Granting him broad authority at this time — especially to make decisions that impact future ESC phases or commit hundreds of thousands of taxpayer dollars — creates a risk of rushed, irreversible actions without long-term accountability.
>
> **2. Lack of Oversight:**
> Granting a single, outgoing employee authority to approve contracts or expenditures beyond a reasonable operational threshold undermines the Board's fiscal oversight and may conflict with the spirit of Minnesota's Open Meeting Law, which requires a recorded vote by each member for any appropriation of public funds. **Financial decisions** must be made through a **transparent public process with proper notice and full board approval.**
>
> **3. Conflict of Interest & Pattern of Concern:**
> There are serious and ongoing concerns involving Mr. Sponholz's conduct and decision-making related to the ESC project and in general:
>
> - Alleged allegations of internal misconduct, including a physical altercation.
> - Credible reports that allegedly 10 staff members have left the Steele County engineering department under his leadership.

- Unanswered questions regarding procedural violations, data withholding, and unapproved project scope expansions.
- Misrepresentation of ESC residents' intentions regarding Public Data Practice Violation investigations as "litigation" was used to justify the misappropriation and redirection of federal funding—without official vote or government oversight, as required under open meeting law—raising serious concerns of procedural manipulation and potential retaliation.

Public trust has been severely compromised.

4. Railroad Liability & Project Risk:
Agenda items indicate that Mr. Sponholz may be negotiating with the railroad to advance the 18th Street Roundabout project. Internal emails and recent comments raise serious concerns:

- The railroad has expressed that it does **not** accept liability for the nearby crossing, citing concerns that the roundabout was not requested or planned by them.
- Safety guidelines required a **minimum 200 feet** between the railroad and a roundabout, yet the current design allows for only 150 feet.
- The County has **not entered** the Section 130 federal program, which would have shifted liability on to the federal government and provided safety-related funding.
- On April 8, 2025, Mr. Sponholz informed the Board that negotiations with the railroad had effectively returned to "square one" after five years of discussion. Yet, tomorrow's agenda suggests he is now prepared to sign agreements with the railroad. This abrupt shift raises serious questions: What level of liability could these agreements impose on Steele County?

This raises critical questions: **Is Mr. Sponholz preparing to commit the County to liability for a railroad crossing that violates design standards?** Who will bear responsibility after his departure?

5. Future Impacts:
Any decisions made now may bind future engineering leadership and commit the County to significant contracts or obligations without proper review. The ESC and other engineering projects must proceed only with proper accountability and public input.

Formal Requests:

We respectfully request that the Board:

- **Deny or table any agenda item** granting increased authority or discretion to Mr. Sponholz.
- **Establish a financial authorization cap** for outgoing department heads (recommendation: $25,000 or less).
- **Suspend all project advancement and financial decisions related to the East Side Corridor, 18th Street Roundabout and potentially other high cost projects** until full independent investigations and procedural reviews into procedural integrity, oversight, and regulatory compliance are completed. This pause is necessary to safeguard public funds, ensure transparency, and restore community trust.
- **Ensure all railroad negotiations** are reviewed in full by the entire Board and legal counsel before approval.

Closing:
This request is not personal. It is about protecting the public interest, ensuring due process, and maintaining institutional integrity during a time of significant transition. Given the controversial nature of the ESC project and its long-term consequences, all actions must reflect the highest standard of public stewardship and transparency.

Thank you for your time and consideration.

Respectfully,
Owatonna East Side Corridor Residents

BM Packet 20250513.pdf
23177K

Comment #226

ESC EAW Comments #36

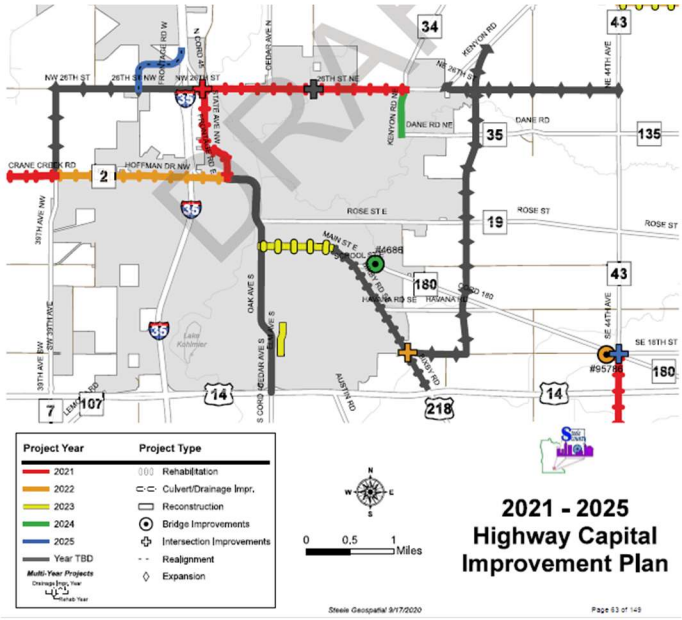
Predetermination Timeline

Although the East Side Corridor (ESC) project was not publicly announced until **July 19–21, 2022**, and a **Preferred Alternative** was not formally selected until **September 24, 2024,** the project record contains extensive documentation demonstrating that the **29th Avenue alignment** was identified, designed, advanced, and treated as the assumed outcome years earlier. As early as 2020, planning documents, capital improvement plans, consultant scopes, alignment maps, utility coordination, and internal correspondence consistently reference construction of a "29th Avenue corridor" rather than a need-based evaluation of whether an east-side arterial was warranted at all. This sequence is inconsistent with Minnesota Environmental Policy Act (MEPA) requirements, which prohibit alternative-limiting actions prior to completion of environmental review. Minn. R. 4410.3100 expressly bars public entities from committing to a specific location, design, or investment that would prejudice or foreclose meaningful consideration of reasonable alternatives. Yet here, the record demonstrates that the ESC's location was functionally selected long before environmental review began, rendering subsequent "alternatives" illusory rather than genuine.

Residents did not merely feel excluded from the process—they were excluded. The record shows that key elements of the project were determined outside public engagement, with public participation occurring only after decisions had already constrained outcomes. MEPA and NEPA require early and frequent public involvement; here, participation was delayed and limited, undermining its purpose and effectiveness.

Timeline:

September 22, 2020 - 2021-2025 Highway Capital Improvement Plan



Construction Year Unscheduled

East Side Corridor (29th Ave)

City of Owatonna & Owatonna Township

Project Number	Project Type
	Expansion

Functional Classification
NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.25

Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NW). The project could be built in stages over a couple of years.

October 23, 2020 – Greg Schultz City Council President Campaign

"Looking into the future I think it is imperative that we identify an east side corridor. With the new high school located in southeast Owatonna a convenient flow of traffic must be achieved on the east side of town. Although it will be a challenging project in terms of design and financing, I believe this a much-needed project to begin work on."
https://www.southernminn.com/owatonna_peoples_press/news/owatonna-city-council-2nd-ward-where-does-the-candidate-stand/article_a16cd5b4-9793-50c0-8b51-5828ca7d2fdf.html

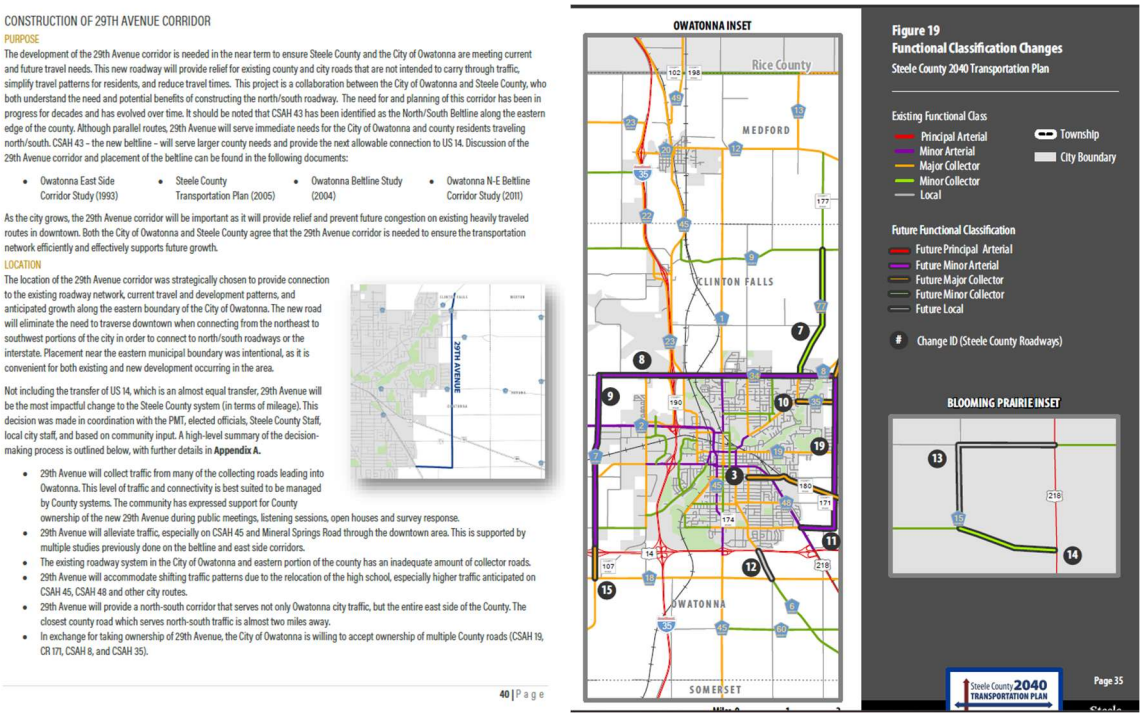
July 13, 2021 – Steele County 2040 Transportation Plan Approved

Page 40 is titled: **CONSTRUCTION OF 29TH AVENUE CORRIDOR**

LOCATION

The location of the 29th Avenue corridor was strategically chosen to provide connection to the existing roadway network, current travel and development patterns, and anticipated growth along the eastern boundary of the City of Owatonna. The new road will eliminate the need to traverse downtown when connecting from the northeast to southwest portions of the city in order to connect to north/south roadways or the interstate. Placement near the eastern municipal boundary was intentional, as it is convenient for both existing and new development occurring in the area.

Not including the transfer of US 14, which is an almost equal transfer, 29th Avenue will be the most impactful change to the Steele County system (in terms of mileage). This decision was made in coordination with the PMT, elected officials, Steele County Staff, local city staff, and based on community input. A high-level summary of the decision-making process is outlined below, with further details in **Appendix A.**



CONSTRUCTION OF 29TH AVENUE CORRIDOR

PURPOSE

The development of the 29th Avenue corridor is needed in the near term to ensure Steele County and the City of Owatonna are meeting current and future travel needs. This new roadway will provide relief for existing county and city roads that are not intended to carry through traffic, simplify travel patterns for residents, and reduce travel times. This project is a collaboration between the City of Owatonna and Steele County, who both understand the need and potential benefits of constructing the north/south roadway. The need for and planning of this corridor has been in progress for decades and has evolved over time. It should be noted that CSAH 43 has been identified as the North/South Beltline along the eastern edge of the county. Although parallel routes, 29th Avenue will serve immediate needs for the City of Owatonna and county residents traveling north/south. CSAH 43 - the new beltline - will serve larger county needs and provide the next allowable connection to US 14. Discussion of the 29th Avenue corridor and placement of the beltline can be found in the following documents:

- Owatonna East Side Corridor Study (1993)
- Steele County Transportation Plan (2005)
- Owatonna Beltline Study (2004)
- Owatonna N-E Beltline Corridor Study (2011)

As the city grows, the 29th Avenue corridor will be important as it will provide relief and prevent future congestion on existing heavily traveled routes in downtown. Both the City of Owatonna and Steele County agree that the 29th Avenue corridor is needed to ensure the transportation network efficiently and effectively supports future growth.

LOCATION

The location of the 29th Avenue corridor was strategically chosen to provide connection to the existing roadway network, current travel and development patterns, and anticipated growth along the eastern boundary of the City of Owatonna. The new road will eliminate the need to traverse downtown when connecting from the northeast to southwest portions of the city in order to connect to north/south roadways or the interstate. Placement near the eastern municipal boundary was intentional, as it is convenient for both existing and new development occurring in the area.

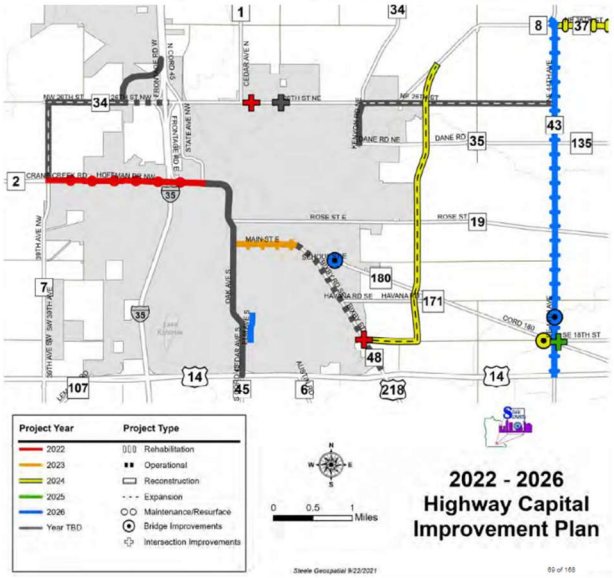
Not including the transfer of US 14, which is an almost equal transfer, 29th Avenue will be the most impactful change to the Steele County system (in terms of mileage). This decision was made in coordination with the PMT, elected officials, Steele County Staff, local city staff, and based on community input. A high-level summary of the decision-making process is outlined below, with further details in **Appendix A.**

- 29th Avenue will collect traffic from many of the collecting roads leading into Owatonna. This level of traffic and connectivity is best suited to be managed by County systems. The community has expressed support for County ownership of the new 29th Avenue during public meetings, listening sessions, open houses and survey response.
- 29th Avenue will alleviate traffic, especially on CSAH 45 and Mineral Springs Road through the downtown area. This is supported by multiple studies previously done on the beltline and east side corridors.
- The existing roadway system in the City of Owatonna and eastern portion of the county has an inadequate amount of collector roads.
- 29th Avenue will accommodate shifting traffic patterns due to the relocation of the high school, especially higher traffic anticipated on CSAH 45, CSAH 48 and other city routes.
- 29th Avenue will provide a north-south corridor that serves not only Owatonna city traffic, but the entire east side of the County. The closest county road which serves north-south traffic is almost two miles away.
- In exchange for taking ownership of 29th Avenue, the City of Owatonna is willing to accept ownership of multiple County roads (CSAH 19, CR 171, CSAH 8, and CSAH 35).

40 | Page

September 9, 2021 – Agenda Item: Consider DRAFT 2022-2026 Highway Capital Improvement Plan and Set Public Hearing

The draft plan is updated with an additional year of projects programmed for 2026. The draft plan shifts several projects earlier or later. Also, the draft plan incorporates the recommendation from the Steele County 2040 Transportation Plan regarding construction of 29th Avenue.



Construction Year: 2024

East Side Corridor (29th Ave)

City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

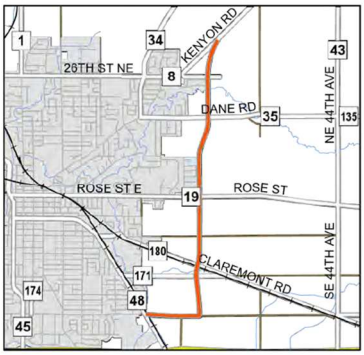
Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21

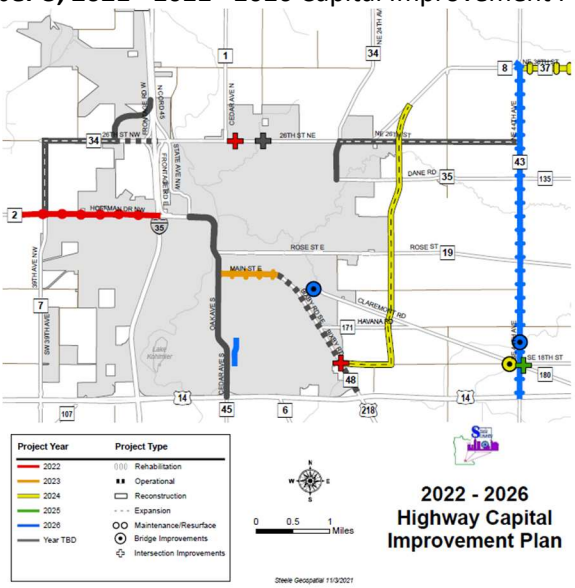
Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NW). The project could be built in stages over a couple of years.



October 14, 2021 - Conduct Public Hearing at 5:15 pm for DRAFT 2022-2026 Highway Capital Improvement Plan

November 3, 2021 - 2022– 2026 Capital Improvement Plan



Construction Year: 2024

East Side Corridor (29th Ave)

City of Owatonna & Owatonna Township

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CP 074-021-006	Expansion

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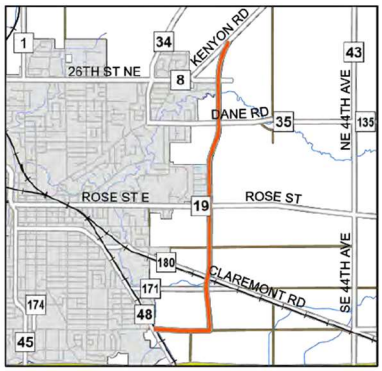
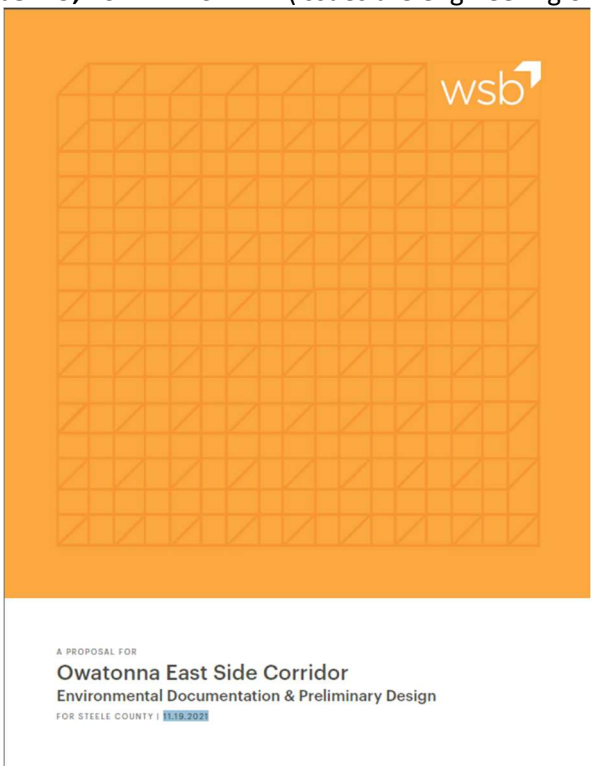
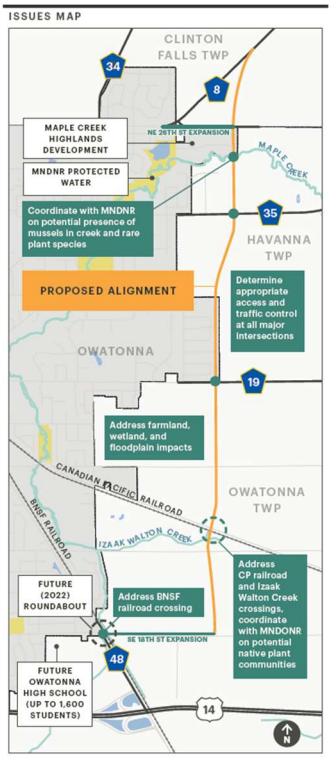


November 19, 2021 – WSB RFP (Issues are engineering only – not environmental)





December 14, 2021 – WSB Selected as Consultant

Board Meeting Agenda Item:

The 2040 Steele County Transportation Plan identified the East Side Corridor, also referred to as 29th Avenue, as a needed addition to the Steele County highway system. At the September 9, 2021 Board meeting, the Board authorized the use of $223,984 Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) funds for the 29th Avenue environmental documentation (EAW). While the contract amount exceeds these funds, the Highway department has budgeted $300,000 for this work in 2022, with the balance being funded through sales tax revenues.

December 17, 2021 – County Engineer Email Discussing price quotes, 3 days after WSB was hired

From: Sponholz, Paul <Paul.Sponholz@CO.STEELE.MN.US>
Sent: Friday, December 17, 2021 10:03 AM
To: Andrew Plowman <APlowman@wsbeng.com>
Subject: East Side Corridor

EXTERNAL EMAIL

Andrew,

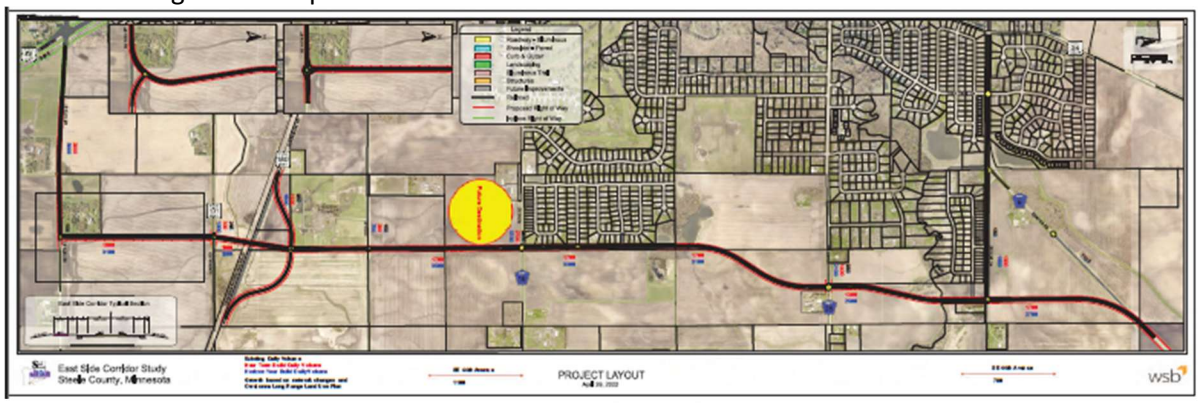
The solicitation is out for ATP-6 STIP funding. The deadline is February 1, so I'll be putting together the application soon. One request for you, can you come up with some sort of estimate for the project's construction or verify my high level estimate? And break it down in two parts, Bixby Rd to Dane Rd, and Dane Rd to CSAH 8 (including the 26th Street extension).

My current rough estimate is $11,500,000 for construction. Based it on $2 million/mile assuming most to be rural 2-lane roadway, a few turn lanes, and some small urban sections. So with the 4.2 miles for the main corridor and another 0.5 miles for the 26th Street extension, comes to about $9.5 million for the road, with another $2 million thrown in for bridges which is probably low if we need a railroad bridge.

I doubt we'll get to far into the study to get much better estimates, but anything you can help add to or verify mine, that would be helpful. Thank you.

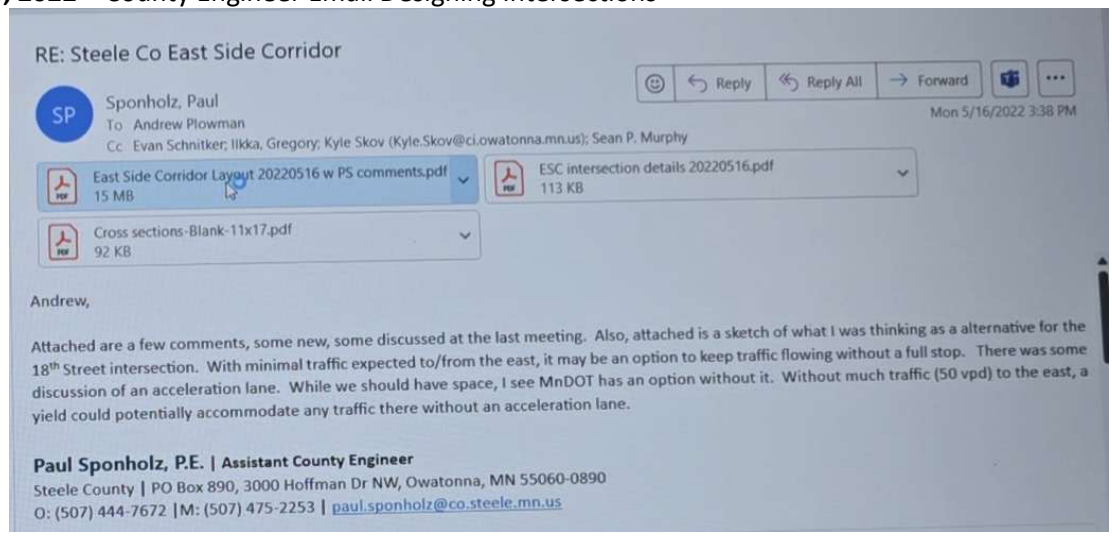
Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | paul.sponholz@co.steele.mn.us

April 9, 2022 – ESC Alignment Map



PROJECT LAYOUT
April 29, 2022

May 16, 2022 – County Engineer Email Designing Intersections



RE: Steele Co East Side Corridor

Reply | Reply All | Forward

SP

Sponholz, Paul
To Andrew Plowman
Cc Evan Schnitker; Ilkka, Gregory; Kyle Skov (Kyle.Skov@ci.owatonna.mn.us); Sean P. Murphy

Mon 5/16/2022 3:38 PM

East Side Corridor Layout 20220516 w PS comments.pdf
15 MB

ESC intersection details 20220516.pdf
113 KB

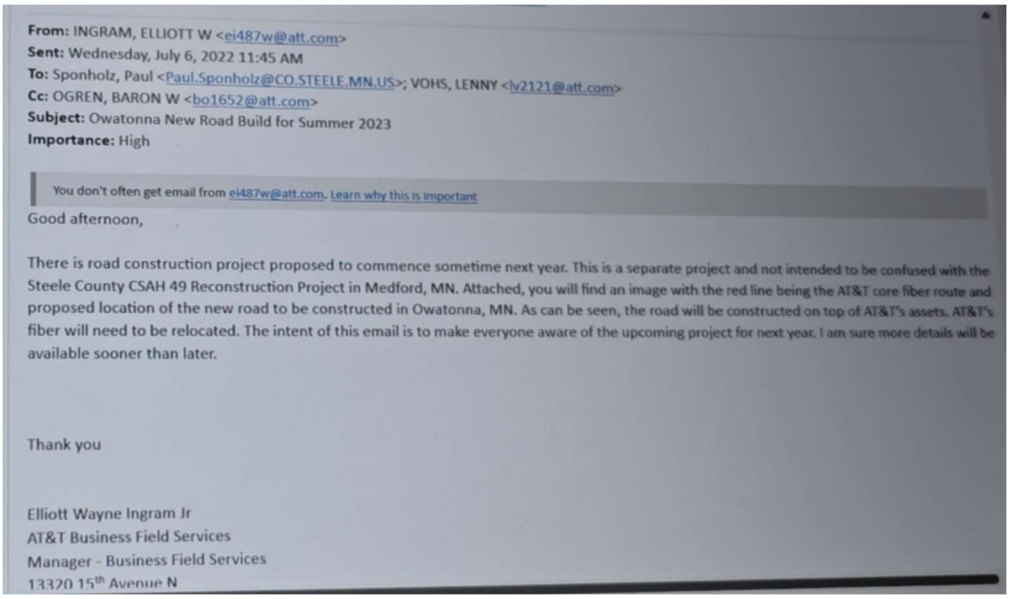
Cross sections-Blank-11x17.pdf
92 KB

Andrew,

Attached are a few comments, some new, some discussed at the last meeting. Also, attached is a sketch of what I was thinking as a alternative for the 18th Street intersection. With minimal traffic expected to/from the east, it may be an option to keep traffic flowing without a full stop. There was some discussion of an acceleration lane. While we should have space, I see MnDOT has an option without it. Without much traffic (50 vpd) to the east, a yield could potentially accommodate any traffic there without an acceleration lane.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | paul.sponholz@co.steele.mn.us

July 6, 2022 – County Engineer Moving Utilities



From: INGRAM, ELLIOTT W <ei487w@att.com>
Sent: Wednesday, July 6, 2022 11:45 AM
To: Sponholz, Paul <Paul.Sponholz@CO.STEELE.MN.US>; VOHS, LENNY <lv2121@att.com>
Cc: OGREN, BARON W <bo1652@att.com>
Subject: Owatonna New Road Build for Summer 2023
Importance: High

You don't often get email from ei487w@att.com. Learn why this is important

Good afternoon,

There is road construction project proposed to commence sometime next year. This is a separate project and not intended to be confused with the Steele County CSAH 49 Reconstruction Project in Medford, MN. Attached, you will find an image with the red line being the AT&T core fiber route and proposed location of the new road to be constructed in Owatonna, MN. As can be seen, the road will be constructed on top of AT&T's assets. AT&T's fiber will need to be relocated. The intent of this email is to make everyone aware of the upcoming project for next year. I am sure more details will be available sooner than later.

Thank you

Elliott Wayne Ingram Jr
AT&T Business Field Services
Manager - Business Field Services
13320 15th Avenue N

July 19-21, 2022 – Public Announcement of the East Side Corridor Project

Public facing appears as alternatives to be studied after 2 years of a predefined route

https://www.southernminn.com/owatonna_peoples_press/community/open-house-for-proposed-east-side-corridor/article_b1c0f562-0776-11ed-b650-f38c41463f2d.html

Open house for proposed East Side Corridor

Jul 19, 2022

Steele County and the City of Owatonna are inviting the public to an open house meeting to review alternatives and provide feedback for the East Side Corridor Project.

The project is investigating options for the construction of a north-south route on the east side of the City of Owatonna from 18th Street SE to 26th Street NW and the route's connections to existing and proposed streets.

The meeting date, time and location are: Thursday, July 21, 4-6 p.m.

Steele County Fairgrounds Community Center

1380 South Elm Avenue Owatonna, MN 55060

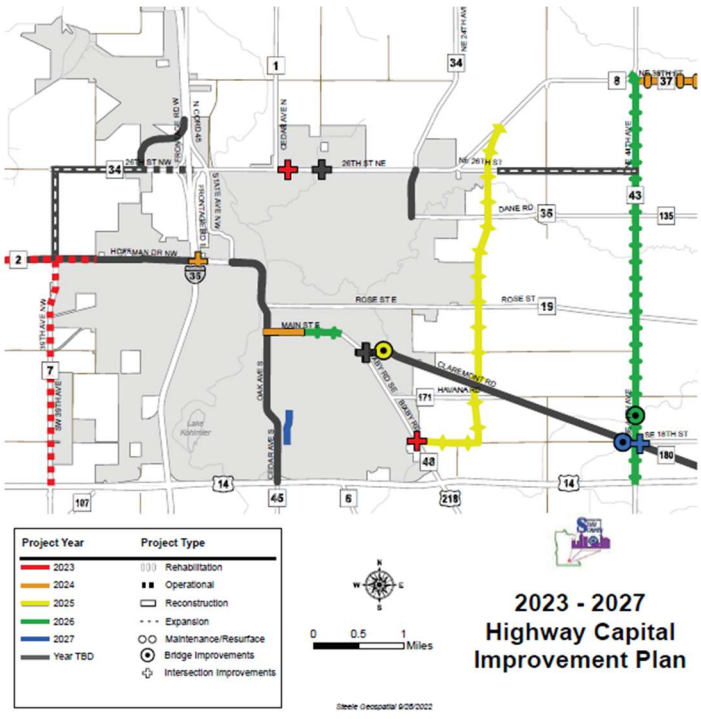
Traffic currently has no direct way for traveling between the northeast and southeast part of Owatonna. Existing highways and streets direct traffic towards the downtown area adding unnecessary traffic and increasing travel times. The new corridor would help alleviate that concern.

After alternates are considered and corridor details are finalized with this study, the project is programmed to be constructed within the next few years.

Privacy - Terms

For more information about the project, or if you are unable to make the open house, check out the following webpage: www.eastsidecorridor.com . The website provides more information about the project and provides an opportunity to take a brief survey and provide feedback on the project.

September 28, 2022 – 2023-2027 CIP



Construction Year: 2025

East Side Corridor

City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

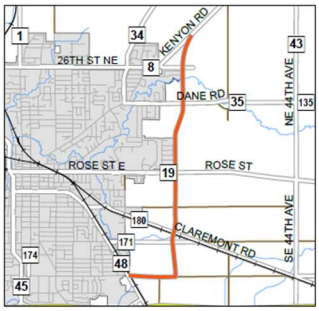
Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21

Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study is in progress during 2022. Depending on the final report, construction could be divided in stages from 2025 to 2027.



November 28, 2023 – OPU Letter of Support for the ESC *"that's been decades in the making"*

November 28, 2023

Mr. Greg Ilkka
Steele County Engineer
3000 Hoffman Drive
P.O. Box 890
Owatonna, MN 55060

SUBJECT: STEELE COUNTY EAST SIDE CORRIDOR

Dear Mr. Ilkka,

The Owatonna Public Utilities Commission is pleased to support the East Side Corridor project.

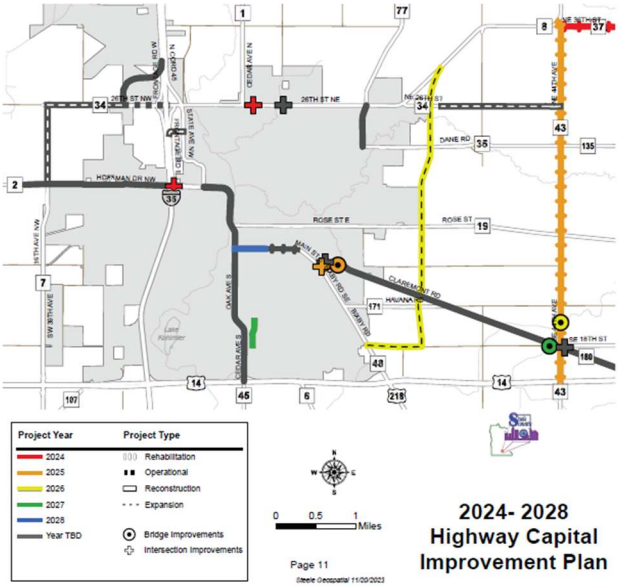
The project, which has been decades in the planning, will address the critical need for a north – south collector route on the east side of Owatonna, as well as serve as a major utility corridor. It will facilitate the City's growth and significantly contribute to its economic development. Without this corridor, traffic into downtown will continue to increase and create congestion which will have a detrimental impact on the economic development of the City.

The Owatonna Public Utilities Commission wishes you the best of luck with your grant application to the Minnesota Local Road Improvement Program.

Sincerely,

Douglas A Bruzek

November 28, 2023 – 2024-2028 CIP



Construction Year: 2026

East Side Corridor

City of Owatonna & Owatonna Township

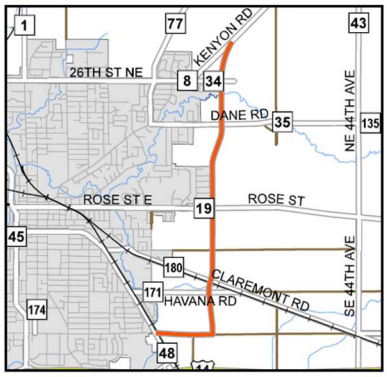
Project Number	Project Type
CP 074-021-006	Expansion

Functional Classification
NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21

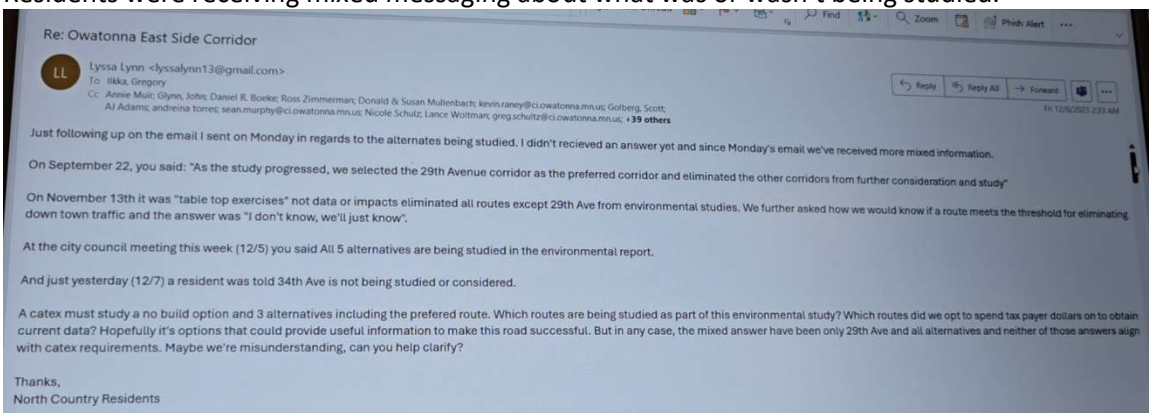
Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study and Environmental Report is in progress. Depending on the final report, construction could be divided in stages. A multi-use trail will also be constructed along side the route.



December 8, 2023 – Resident Email

Residents were receiving mixed messaging about what was or wasn't being studied.



Re: Owatonna East Side Corridor

Lyssa Lynn <lyssalynn13@gmail.com>
To Ilkka, Gregory
Cc Annie Muir; Glynn, John; Daniel R. Boeke; Ross Zimmerman; Donald & Susan Mullenbach; kevin.raney@ci.owatonna.mn.us; Golberg, Scott; AJ Adams; andreina torres; sean.murphy@ci.owatonna.mn.us; Nicole Schulz; Lance Woltman; greg.schultz@ci.owatonna.mn.us; +39 others

Fri 12/8/2023 2:33 AM

Just following up on the email I sent on Monday in regards to the alternates being studied. I didn't recieved an answer yet and since Monday's email we've received more mixed information.

On September 22, you said: "As the study progressed, we selected the 29th Avenue corridor as the preferred corridor and eliminated the other corridors from further consideration and study"

On November 13th it was "table top exercises" not data or impacts eliminated all routes except 29th Ave from environmental studies. We further asked how we would know if a route meets the threshold for eliminating down town traffic and the answer was "I don't know, we'll just know".

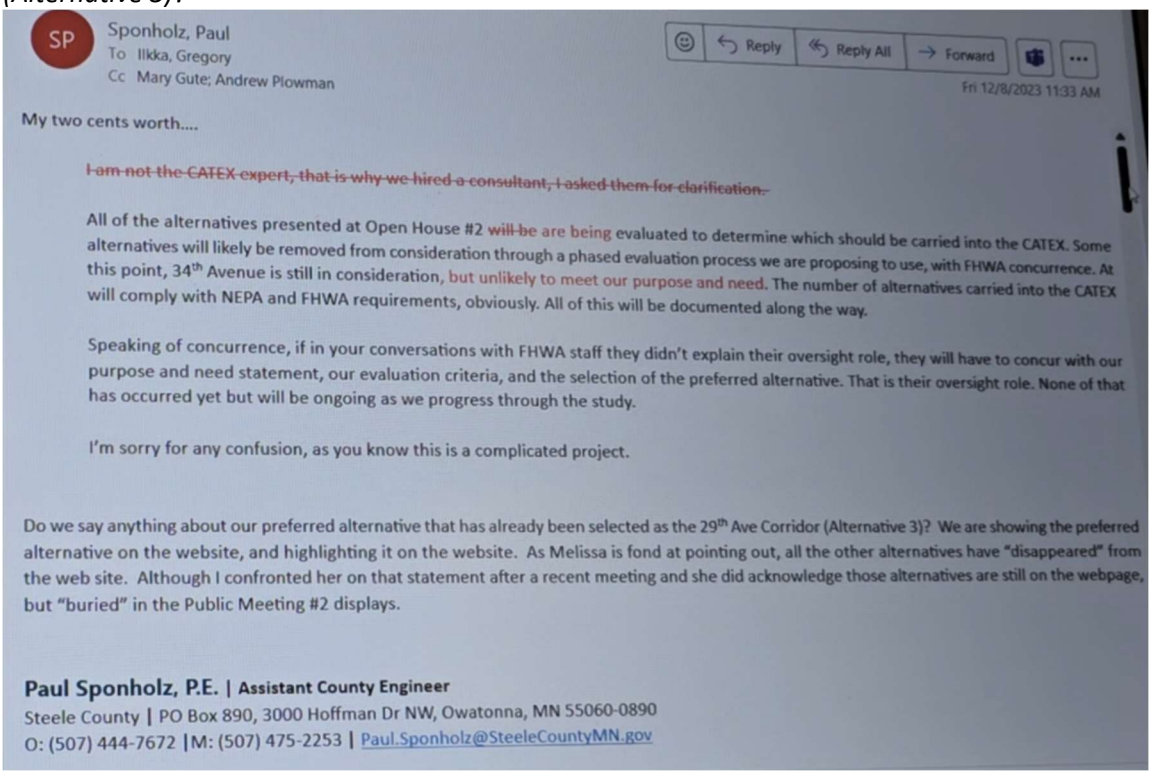
At the city council meeting this week (12/5) you said All 5 alternatives are being studied in the environmental report.

And just yesterday (12/7) a resident was told 34th Ave is not being studied or considered.

A catex must study a no build option and 3 alternatives including the prefered route. Which routes are being studied as part of this environmental study? Which routes did we opt to spend tax payer dollars on to obtain current data? Hopefully it's options that could provide useful information to make this road successful. But in any case, the mixed answer have been only 29th Ave and all alternatives and neither of those answers align with catex requirements. Maybe we're misunderstanding, can you help clarify?

Thanks,
North Country Residents

"Do we say anything about our preferred alternative has already been selected as the 29th Ave corridor (Alternative 3)?



Sponholz, Paul
To Ilkka, Gregory
Cc Mary Gute; Andrew Plowman

Reply | Reply All | Forward

Fri 12/8/2023 11:33 AM

My two cents worth....

~~I am not the CATEX expert, that is why we hired a consultant, I asked them for clarification.~~

All of the alternatives presented at Open House #2 ~~will be~~ are being evaluated to determine which should be carried into the CATEX. Some alternatives will likely be removed from consideration through a phased evaluation process we are proposing to use, with FHWA concurrence. At this point, 34th Avenue is still in consideration, but unlikely to meet our purpose and need. The number of alternatives carried into the CATEX will comply with NEPA and FHWA requirements, obviously. All of this will be documented along the way.

Speaking of concurrence, if in your conversations with FHWA staff they didn't explain their oversight role, they will have to concur with our purpose and need statement, our evaluation criteria, and the selection of the preferred alternative. That is their oversight role. None of that has occurred yet but will be ongoing as we progress through the study.

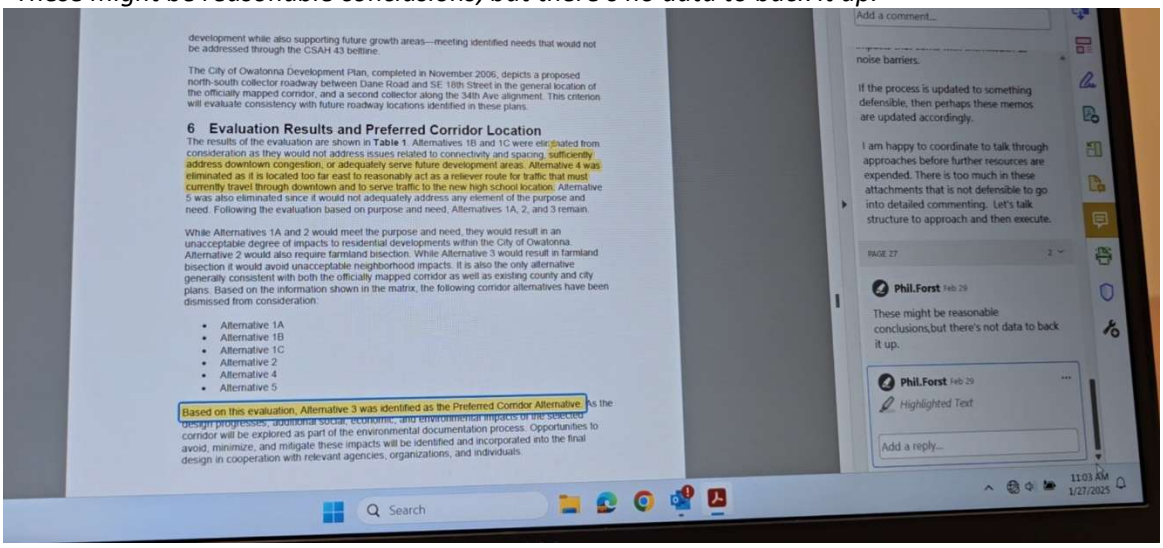
I'm sorry for any confusion, as you know this is a complicated project.

Do we say anything about our preferred alternative that has already been selected as the 29th Ave Corridor (Alternative 3)? We are showing the preferred alternative on the website, and highlighting it on the website. As Melissa is fond at pointing out, all the other alternatives have "disappeared" from the web site. Although I confronted her on that statement after a recent meeting and she did acknowledge those alternatives are still on the webpage, but "buried" in the Public Meeting #2 displays.

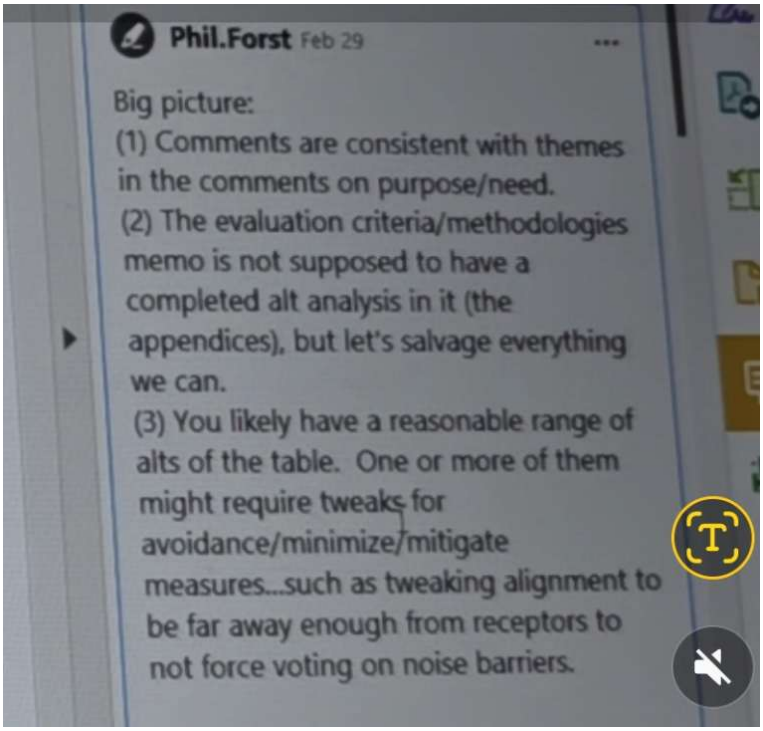
Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

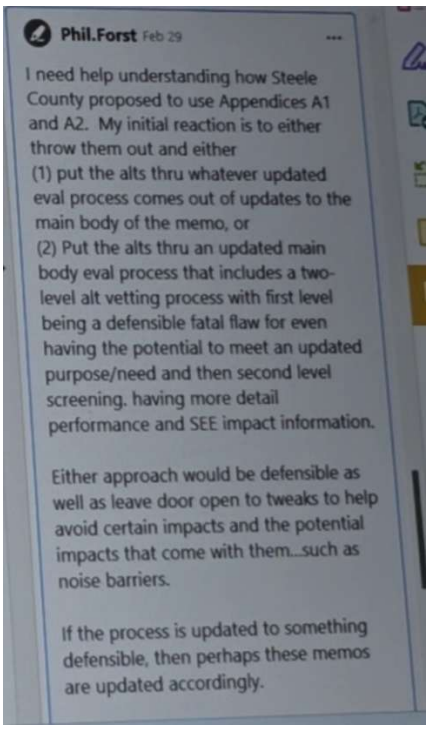
February 29, 2024 – FHWA Comments on the Preferred Alternative Memo

"*These might be reasonable conclusions, but there's no data to back it up.*"



"(3) You likely have a reasonable range of Alts of the table. One or more of them might require tweaks for avoidance/minimize/mitigate measures…such as tweaking alignment to be far away enough from receptors to not force voting on noise barrier."

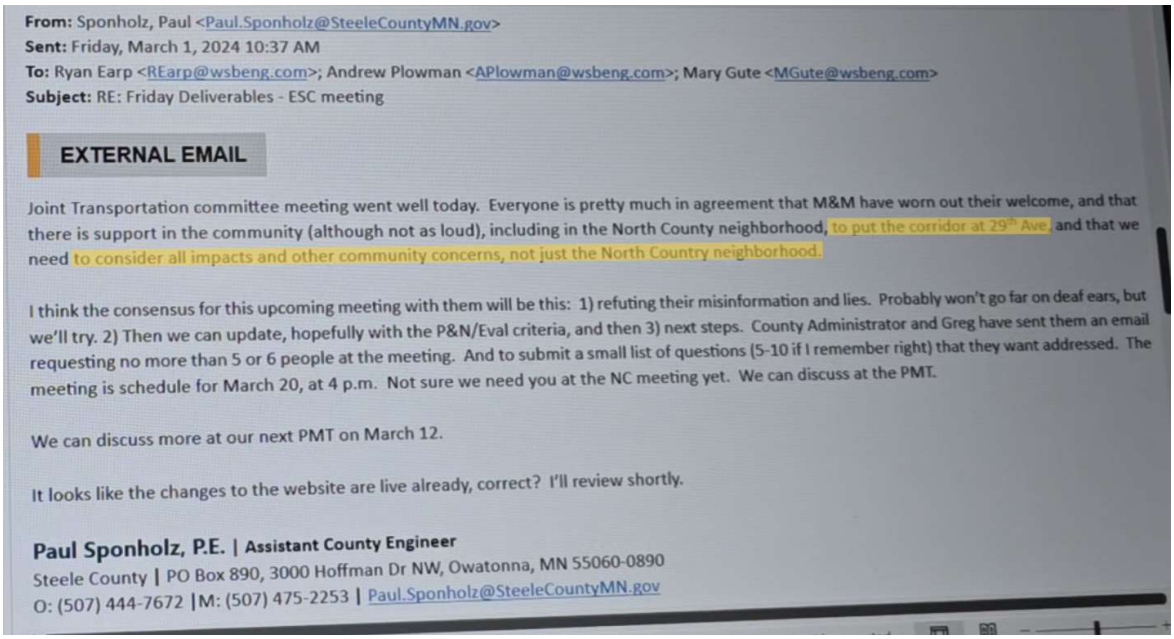




March 1, 2024 – County Engineer Email

The resident's most impacted don't matter so long as other wants are met. Also, discussed residents and how to control their advocacy, in a meeting residents can't have access to.

"to put the corridor at 29th Ave and that we need to consider all impacts and other community concerns, not just the North Country neighborhood."



From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Friday, March 1, 2024 10:37 AM
To: Ryan Earp <REarp@wsbeng.com>; Andrew Plowman <APlowman@wsbeng.com>; Mary Gute <MGute@wsbeng.com>
Subject: RE: Friday Deliverables - ESC meeting

EXTERNAL EMAIL

Joint Transportation committee meeting went well today. Everyone is pretty much in agreement that M&M have worn out their welcome, and that there is support in the community (although not as loud), including in the North County neighborhood, to put the corridor at 29th Ave, and that we need to consider all impacts and other community concerns, not just the North Country neighborhood.

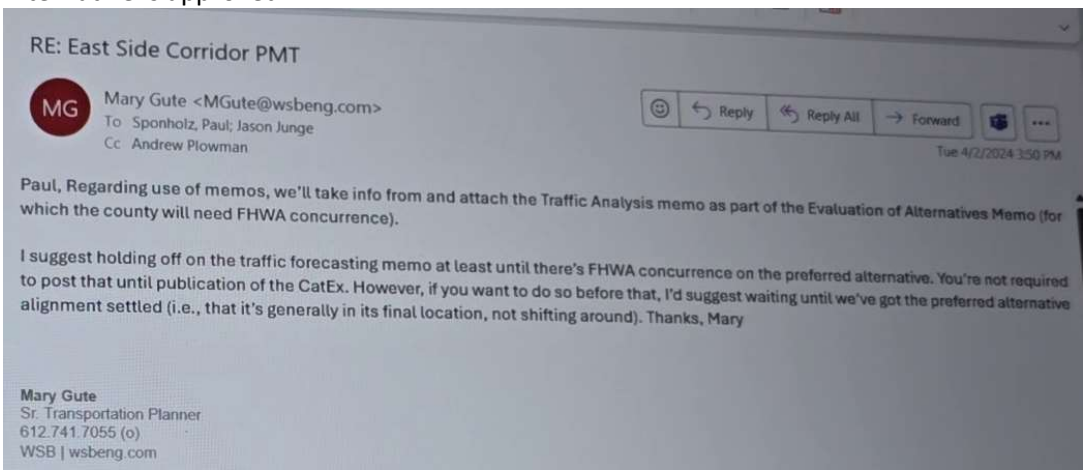
I think the consensus for this upcoming meeting with them will be this: 1) refuting their misinformation and lies. Probably won't go far on deaf ears, but we'll try. 2) Then we can update, hopefully with the P&N/Eval criteria, and then 3) next steps. County Administrator and Greg have sent them an email requesting no more than 5 or 6 people at the meeting. And to submit a small list of questions (5-10 if I remember right) that they want addressed. The meeting is schedule for March 20, at 4 p.m. Not sure we need you at the NC meeting yet. We can discuss at the PMT.

We can discuss more at our next PMT on March 12.

It looks like the changes to the website are live already, correct? I'll review shortly.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

April 2, 2025 – Recommendation to not post completed studies on single alternative until the prefered Alternative is approved



RE: East Side Corridor PMT

MG Mary Gute <MGute@wsbeng.com>
To Sponholz, Paul; Jason Junge
Cc Andrew Plowman

Reply | Reply All | Forward

Tue 4/2/2024 3:50 PM

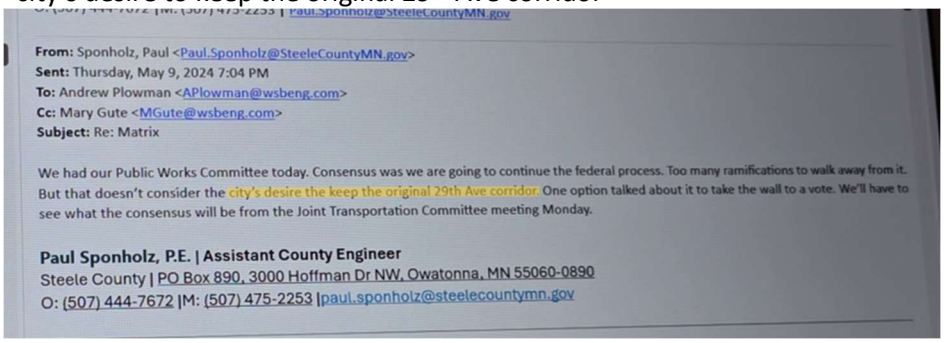
Paul, Regarding use of memos, we'll take info from and attach the Traffic Analysis memo as part of the Evaluation of Alternatives Memo (for which the county will need FHWA concurrence).

I suggest holding off on the traffic forecasting memo at least until there's FHWA concurrence on the preferred alternative. You're not required to post that until publication of the CatEx. However, if you want to do so before that, I'd suggest waiting until we've got the preferred alternative alignment settled (i.e., that it's generally in its final location, not shifting around). Thanks, Mary

Mary Gute
Sr. Transportation Planner
612.741.7055 (o)
WSB | wsbeng.com

May 9, 2024 – County Engineer Email

"city's desire to keep the original 29th Ave corridor"

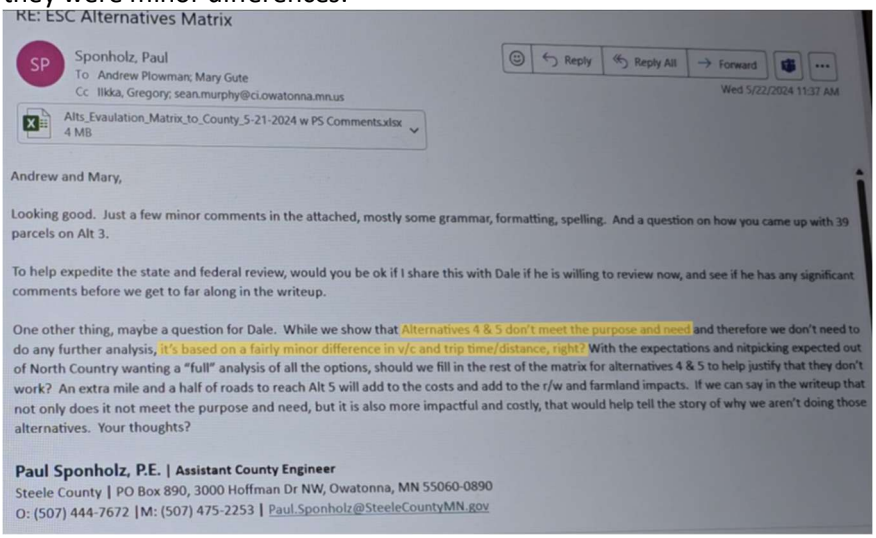


From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Thursday, May 9, 2024 7:04 PM
To: Andrew Plowman <APlowman@wsbeng.com>
Cc: Mary Gute <MGute@wsbeng.com>
Subject: Re: Matrix

We had our Public Works Committee today. Consensus was we are going to continue the federal process. Too many ramifications to walk away from it. But that doesn't consider the city's desire the keep the original 29th Ave corridor. One option talked about it to take the wall to a vote. We'll have to see what the consensus will be from the Joint Transportation Committee meeting Monday.

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 |paul.sponholz@steelecountymn.gov

May 22, 2024 – County Engineer Email questioning how defensible the removal of Alternative 4 & 5 are given they were minor differences.



RE: ESC Alternatives Matrix

Sponholz, Paul
To Andrew Plowman; Mary Gute
Cc Ilkka, Gregory; sean.murphy@ci.owatonna.mn.us
Alts_Evaulation_Matrix_to_County_5-21-2024 w PS Comments.xlsx
4 MB

Reply | Reply All | Forward
Wed 5/22/2024 11:37 AM

Andrew and Mary,

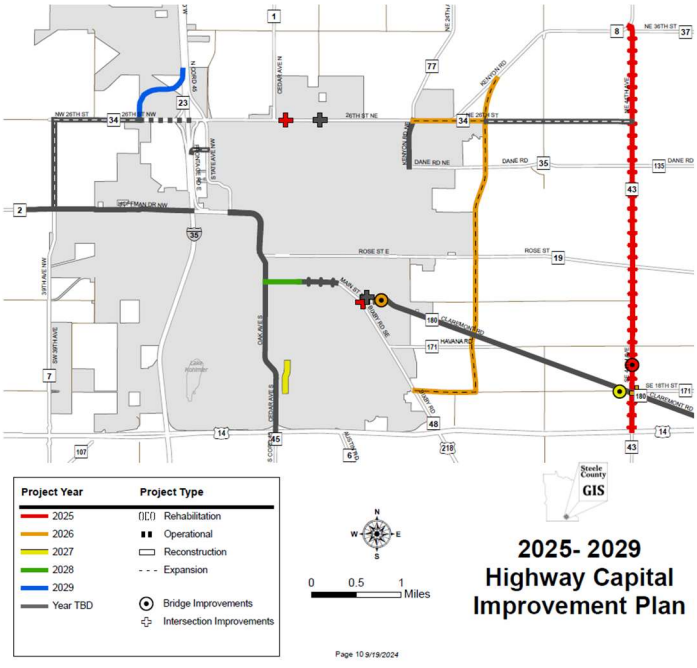
Looking good. Just a few minor comments in the attached, mostly some grammar, formatting, spelling. And a question on how you came up with 39 parcels on Alt 3.

To help expedite the state and federal review, would you be ok if I share this with Dale if he is willing to review now, and see if he has any significant comments before we get to far along in the writeup.

One other thing, maybe a question for Dale. While we show that Alternatives 4 & 5 don't meet the purpose and need and therefore we don't need to do any further analysis, it's based on a fairly minor difference in v/c and trip time/distance, right? With the expectations and nitpicking expected out of North Country wanting a "full" analysis of all the options, should we fill in the rest of the matrix for alternatives 4 & 5 to help justify that they don't work? An extra mile and a half of roads to reach Alt 5 will add to the costs and add to the r/w and farmland impacts. If we can say in the writeup that not only does it not meet the purpose and need, but it is also more impactful and costly, that would help tell the story of why we aren't doing those alternatives. Your thoughts?

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

September 19, 2024 – 2025-2029 CIP



Construction Year: 2026

East Side Corridor

City of Owatonna & Owatonna Township

Project Number	Project Type
074-070-010 & 074-021-006	Expansion

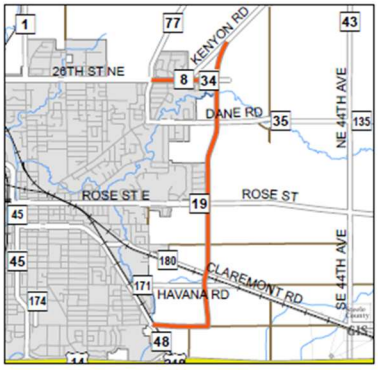
Functional Classification

Major Collector

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	5.01

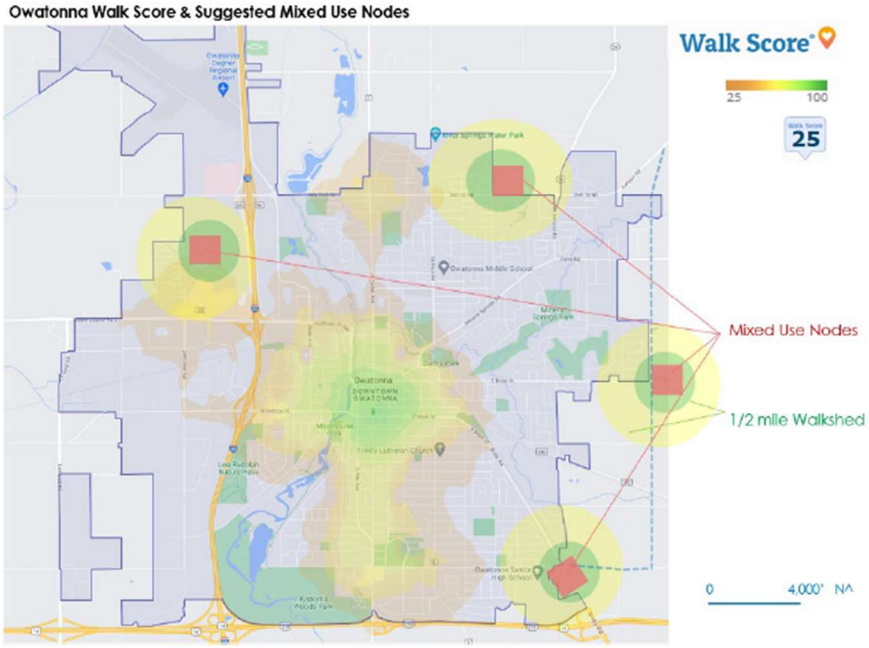
Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study and Environmental Report is in progress. Depending on the final report, construction could be divided in stages. A multi-use trail will also be constructed along side the route.



September 24, 2024 – Imagine Owatonna Final Open house

Primary goal was to determine the placement of the ESC, per Steele County



September 24, 2024 – Preferred Alternative Selected and kept from the public

Email with State Aid after residents reached out asking for the preferred Alternative Memo.

We aren't ready to discuss publicly, but other options to avoid the wall and address federal noise standards include moving the road 600-800 feet east, assuming it reduces noise impacts. It is feasible from the federal standpoint. How ever it has serious ramifications to the city and township and their development agreements, serious impacts to farmland since we already own 6 acres of land along the subdivision, and it would affect several farmer and their land, serious implications to area farmers and the many other people, who unlike Melissa, have always understood the road was going there and have told us they'd be very unhappy if we move it, serious impacts in how the city would redevelop that land with utilities, etc. All that discussion will like be looked at and included in the final reports.

The mitigation studies she is asking for is going to happen as we study impacts now and come up with avoidance and mitigations as we complete the environmental documentation. She needs patience. Ultimately she will unlikely be unhappy with the final results but we need to think of the county and city as a whole and not just her back yard.

Paul Sponholz, P.E. | **County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7671 | M: (507) 475-2253 | paul.sponholz@steelecountymn.gov

April 8, 2025 – County Administrator told resident avoidance options would not be considered and they should talk about trees because that's what the solution was going to be.

May 13, 2025 – Alternative limiting designs, and ROW actions taken
- Owatonna Township signs an alternative limiting

RESOLUTION

TOWN BOARD OF OWATONNA TOWNSHIP

WHEREAS, the Town and the City have annually adopted an orderly Annexation Agreement to provide land areas for the growth of the City and further, to provide for the protection of agricultural and other lands within the Township from urban and suburban development and to promote an organized framework for systematic annexation, and part of that agreement, the Township does not support non-farm use of the properties in the growth area, and

WHEREAS, the Preferred Alternative is largely in the defined growth areas and has less farmland impacts than the alternatives further east, and

WHEREAS, the Preferred Alternative keeps development from leapfrogging into non developed area and keeps development near existing city limits, and

WHEREAS, the Preferred Alignment best supports existing and near-term City development while preserving farmland further east, and

WHEREAS, the city dedicated land on the east side of the North County Additions 1, 2, and 3 plats preserving land for the route, and that land is already out of farmland production, further protecting additional farmland from being removed from production through other alternative routes, and

WHEREAS, Alternatives 4 and 5 presented in the environmental documents have greater farmland impacts, and would encourage development outside of the annexation agreement development areas.

NOW, THEREFORE, BE IT RESOLVED, the township does not support any other alternatives that impact farmland outside of orderly annexation agreement areas, or that do not use already-dedicated lands for the route.

BE IT FURTHER RESOLVED the Township requests that the County and City follow their previous significant planning efforts and agreements to preserve farmland and promote the orderly growth of the City.

BE IT FURTHER RESOLVED the Township supports the selection of the preferred alternative, identified as Alternative 3 as shown in the federal and state environmental documents, and commonly referred to as the 29th Avenue alignment.

ADOPTED 5-13-25 **, 2025.**

OWATONNA TOWNSHIP BOARD
Steele County, Minnesota

By: Jerry Katzung
Chairman

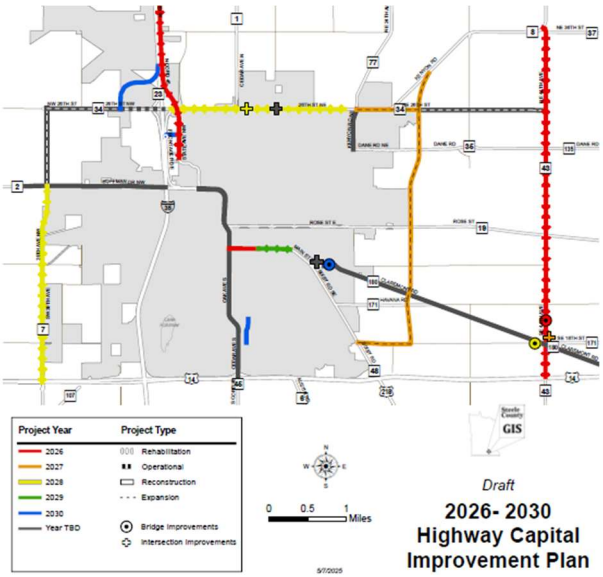
ATTEST:
By:
Township Clerk

CERTIFICATION

I hereby certify that the above *is* a true and correct copy of a Resolution duly passed, adopted, and approved by the Owatonna Township Board on the 13th day of May, 2025.

Township Clerk

May 13, 2025 – 2026-2030 CIP



Construction Year: 2027

East Side Corridor

City of Owatonna & Owatonna Township

Project Number	Project Type
074-070-010 & 074-021-006	Expansion

Functional Classification
Major Collector

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
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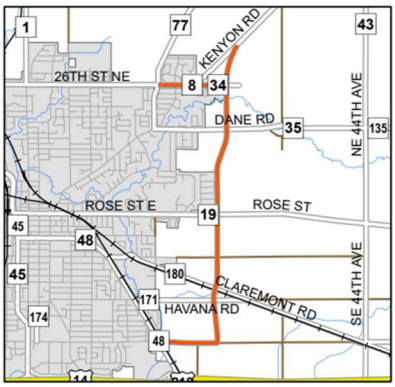

November 18, 2025 – EAW comment period while Steele County had an active Public Data Practices case open and residents did not have access to data.

December 11, 2025 – Project Meeting video showing Imagine Owatonna was to decide on the ESC and that it is development driven: https://youtu.be/zDO3GhWSP58

December 16, 2025 – City of Owatonna approved a Resolution limiting the location to 1 location, ROW work, and cost sharing.

RESOLUTION NO. 88-25

RESOLUTION APPROVING MUNICIPAL SUPPORT FOR EAST SIDE CORRIDOR PROJECT

WHEREAS, Steele County has, through its Capital Improvement Plan (CIP), recommended an expansion project on the east side of Owatonna, known as the East Side Corridor, to alleviate downtown congestion, improve vehicle safety and increase multimodal transportation; and

WHEREAS, Steele County and the City have, through their separate and simultaneous 2040 Transportation Plans, recommended the addition of a north-south corridor on the east side of the Owatonna Municipal Boundary; and

WHEREAS, Steele County, in consultation with the City, commenced the East Side Corridor Study to further develop the north-south route and subsequently engaged in an extensive Environmental review process conforming to Federal Highway Administration (FHWA) and Minnesota State Rules beginning in 2022 to identify and evaluate corridor locations; and

WHEREAS, Steele County and the City, together with WSB, have engaged in community engagement as part of the study and preliminary design efforts intended to gather and consider public feedback for the proposed expansion; and

WHEREAS, Steele County received concurrence in fall of 2024 on the preferred corridor, Alternative 3, which is consistent with the location of the Steele County officially mapped corridor and is approximately 2.2 miles east of CSAH 1/Cedar Avenue/CSAH 45, with deviations north of CSAH 19 (Rose Street) and south of CR 180; and

WHEREAS, the project is consistent with the City's 2050 Comprehensive Plan; and

WHEREAS, the project conforms to the orderly annexation agreement in place between the City and Owatonna Township; and

WHEREAS, prior to advertising for contractor bids on the Project, Steele County will present the City with a Cooperative Agreement for the cost sharing of the improvements; and

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Owatonna supports the selected alternative, Alternative 3; and

NOW, THEREFORE, BE IT FURTHER RESOLVED by the City Council of the City of Owatonna that the City of Owatonna supports the County continuing with the development of final plans and right-of-way acquisition necessary for the construction of the Project; and

Passed and adopted this _____ day of _____ 2025, with the following vote:

Aye _____; No _____; Absent _____.

Approved and signed this _____ day of _____, 2025.

Today – Data remains inaccessible, despite residents asking numerous times for delays or paused in the EAW comment period so that we can have meaningful access.

Conclusion:

Taken as a whole, the record reflects **more than three and a half years** of **continuous advancement** of a **predetermined route** rather than an open, **good-faith evaluation of need, location, or impacts**. While later

Capital Improvement Plans removed the explicit label **“29th Avenue,”** the underlying alignment, utility placement, right-of-way planning, and development coordination remained unchanged, confirming that the project’s substance did not shift—only its terminology. The **2040 Transportation Plan** did not identify a demonstrated transportation need for an East Side Corridor; instead, it selected a location, embedded infrastructure commitments, and aligned surrounding development decisions in a manner that locked in impacts to hundreds of residents before environmental review occurred; before the public was ever made aware.

This constitutes a **fatal flaw under MEPA**: the **alternatives analysis was irreversibly prejudiced, avoidance options were foreclosed, and environmental review was reduced to justification rather than evaluation**. Under these circumstances, an **independent Environmental Impact Statement (EIS) is not merely appropriate—it is required** to remedy the loss of procedural integrity, restore meaningful consideration of reasonable alternatives, and ensure compliance with Minn. R. 4410.3100 and the core purposes of MEPA.

Residents deserve a voice. We will continue to advocate for our rights to life, safety, and quality of life through all lawful and public means available.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #227

ESC EAW Comments #37

Manipulation of Screening Criteria to Predetermine the Preferred Alternative

The alternatives screening process for the East Side Corridor reflects the use of internally constructed criteria that appear tailored to produce a predetermined outcome rather than to objectively evaluate reasonable alternatives. Thresholds and qualitative measures were applied in a manner that consistently favored Alternative 3 while disadvantaging Alternatives 4 and 5, despite those alternatives remaining consistent with the stated purpose and need.

For example, cost thresholds were framed such that projects below an approximately $30 million benchmark were characterized as “good,” while alternatives marginally exceeding that figure were treated as unacceptable—despite the Preferred Alternative itself being reported at approximately $29.X million publicly, while internal emails showed $35+ million. Similar results-oriented framing occurred with criteria related to connectivity to neighborhoods, parks, destinations, etc, where subjective scoring and color-coding were applied inconsistently and, in some instances, incorrectly.

Most notably, Alternatives 4 and 5 were eliminated as being “too far away,” even though the project’s stated purpose and need identifies arterial spacing of approximately one to three miles. Those alternatives fall within that range and therefore should have remained reasonable options. Their elimination reflects not a failure to meet project need, but the retroactive application of criteria designed to exclude them.

This approach undermines the integrity of the alternatives analysis required under MEPA and NEPA. An alternatives evaluation must test options against objective, consistently applied criteria—not redefine success parameters to ensure selection of a preferred outcome. When criteria are shaped to fit a desired alternative, the resulting analysis cannot be relied upon to support informed decision-making and further supports the need for a full independent Environmental Impact Statement.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #228

ESC EAW Comments #15

Reliance on a Functionally Abandoned Mapped Corridor Renders the EAW Incomplete and Misleading

This comment addresses the Responsible Governmental Unit's reliance on a decades-old mapped corridor to justify the East Side Corridor project. The County's and City's own actions over more than two decades demonstrate that this corridor was not preserved and has been functionally abandoned. Continued reliance on it establishes a false environmental baseline and materially undermines the adequacy of the Environmental Assessment Worksheet (EAW).

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1. A Mapped Corridor Is Not a Preserved Right-of-Way

The EAW repeatedly relies on the existence of a mapped corridor dated February 10, 2000 as justification for alignment selection, proximity to residences, and dismissal of avoidance alternatives. However, mapping alone does not preserve a right-of-way. Preservation requires affirmative actions such as acquisition, reservation through plat restrictions, zoning controls, or consistent enforcement through permitting decisions. Here, the corridor was mapped without acquisition of right-of-way and without implementation of land use controls. Treating a mapped planning line as an enduring entitlement misrepresents existing conditions and overstates the legitimacy of placing a high-capacity roadway immediately adjacent to established homes.

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2. County and City Actions Demonstrate Functional Abandonment

The public record demonstrates a long-standing pattern of governmental actions incompatible with corridor preservation:

- **1995-1999 planning documents** acknowledged that any future roadway should avoid existing and future homes by approximately **800 feet**, reflecting early recognition of residential protection as a planning constraint, recommend avoiding new crossings at maple creek, and minimize potential impacts.
- In **2000**, the corridor was mapped without acquisition of right-of-way or adoption of enforceable land-use protections.
- In **February 2004**, the City and County entered into a Joint Powers Agreement that included mechanisms intended to preserve future roadway interests, including a right of first refusal and a six-month contention window.
- **In August 2004, the City and County completed the U.S. Highway 14 Beltline Study, which identified 44th Avenue East—not the mapped east-side corridor—as the preferred East Beltline alignment.** That study relegated 34th Avenue East to an internal or collector function and did not advance the mapped east-side corridor as the beltline.

- **Following that study, 44th Avenue East was physically connected to Highway 14**, reinforcing its role as the operative beltline, while the mapped east-side corridor was neither preserved nor advanced.
- These actions confirm that, by 2004, the mapped east-side corridor was no longer treated by the City or County as the functional beltline alignment, further supporting its abandonment as an operative transportation corridor.
- **6 months after the Joint Powers Agreement was signed**, the first residential home was permitted and constructed within the mapped corridor, without contention or exercise of preservation rights.
- Over the following 20 years, additional homes were permitted and built on **50 feet of the mapped corridor** in the North Country subdivision and approval of subdivisions constructed entirely over the mapped alignment were approved.
- No right-of-way acquisition occurred during subdivision approvals, platting actions, or building permit issuance over the ensuing **26 years**.
- On **February 5, 2005** an official corridor map for **34th Avenue** East and 44th Avenue East were prepared and filed with the county in 2009.

In August 2013, the City affirmatively abandoned the east beltline concept through formal action.

At the August 5, 2013 City Council meeting, the then City Engineer stated on the record that approximately five miles of Municipal State Aid (MSA) mileage had been **reserved for a future east beltline**, including a **non-existent segment** that the City **did not expect to ever connect or construct in the foreseeable future**. Staff recommended reassigning that reserved MSA mileage, explaining that the designation could be moved without penalty and that reallocating it would increase state aid revenue. The City Council approved this recommendation by unanimous vote (Agenda Item 3.4.4, Resolution 72-13).

This action constitutes an affirmative municipal decision to relinquish any remaining functional commitment to the east beltline concept. Regardless of alignment, the City treated the corridor as speculative and disposable rather than preserved or operative. This contemporaneous record confirms that, by 2013, the east beltline was no longer regarded as a viable or protected transportation corridor. (Watch the decision here: https://youtu.be/LzxSVqFOAjw)

These actions are not passive oversights. They are affirmative land-use decisions fundamentally inconsistent with corridor preservation and demonstrate functional abandonment, regardless of whether formal legal abandonment procedures were pursued.

Steele County and the City or Owatonna did not merely fail to preserve the right-of-way; they took affirmative steps to abandon the corridor by authorizing development within the mapped alignment and later relinquishing remaining corridor capacity.

3. Mechanisms to Preserve a Corridor and Actions Taken (or Not Taken)

The public record demonstrates that although a planning map was recorded in 2000, the City and County repeatedly declined to use available legal mechanisms to preserve a corridor or right-of-way. Instead, they took affirmative actions incompatible with preservation.

A. The recorded corridor map was not carried forward or indexed to successor parcels

The Official Mapped Corridor recorded in 2000 was indexed only to generalized land descriptions (quarter–quarter sections) and **was not indexed to parcel identification numbers created through subsequent subdivision approvals**. County Recorder staff confirmed on December 26, 2025 that the document does not appear in parcel-based searches and locating it would require searching historical tract descriptions predating subdivision.

As a result, the corridor map does not appear in deeds, plats, or parcel records affecting current residential properties and would not be discoverable through reasonable diligence by homeowners, purchasers, or lenders. No mechanism existed requiring disclosure of the corridor upon sale or transfer of property. A planning document that is not carried forward to successor parcels and does not surface in parcel-based searches cannot reasonably be treated as a preserved or existing condition.

Accordingly, the County's statement on the public project website — "Shows the corridor on title record of affected property" — is factually inaccurate and has fueled public misinformation, which has unfairly shifted blame onto residents for impacts they had no reasonable way to anticipate.

B. Subdivision plats did not reserve outlots or parcels for roadway purposes

The recorded plats for the North Country subdivisions depict designated outlots; however, **none of the outlots or portions of resident-owned parcels were reserved or dedicated as streets, rights-of-way, or transportation easements**. The plats expressly dedicate only the streets and utility easements shown on the plat to the City for public use. No corridor, roadway reservation, or transportation easement is identified or described.

C. Outlots were treated as residential land, not transportation infrastructure

The outlots were assessed and taxed as residential vacant land through at least 2019. From 2005 through 2012, the outlots carried substantial assessed land values (approximately $15,000–$33,000 per outlot), consistent with buildable residential land rather than preserved right-of-way. In 2015, the outlots were allowed to enter foreclosure and remained so until approximately 2018, when the lender approached the City regarding transfer due to stormwater pond maintenance obligations. At no point were the outlots treated, taxed, or managed as transportation corridor land,

and the County and City failed to take action to preserve the land.

D. Subdivision approvals following mapping confirm non-preservation
The corridor was mapped in 2000. The first North Country subdivision addition was approved on May 6, 2003. A Joint Powers Agreement intended to preserve future corridor interests was signed on March 9, 2004. **Just one week later**, on March 16, 2004, the City approved North Country Addition No. 2 without purchasing the outlot, contesting the development, exercising any right of first refusal, or preserving a transportation easement—despite the corridor area remaining undeveloped at that time. Similar approvals occurred with North Country Addition No. 3 on September 25, 2005, again without any preservation action.

Similarly, the Shady Hills subdivision was annexed, approved, and platted around the same period, with city lots occupying the entirety of the mapped corridor area.

These were affirmative land-use decisions inconsistent with corridor preservation and demonstrate functional abandonment regardless of whether formal legal abandonment procedures were pursued.

E. Formal relinquishment of corridor designation in 2013
On August 5, 2013, the City formally approved removal of Municipal State Aid (MSA) mileage reservations associated with the East Side Beltline, stating on the record that the City did not see the project ever occurring, or at least not in the foreseeable future. This action was unanimously approved and memorialized in Resolution 72-13, further confirming abandonment of any intent to preserve the corridor.

Although a planning map was recorded in 2000, it did not create a right-of-way, did not establish easements, and was not carried forward to successor parcels created through subdivision. The City and County repeatedly approved development, issued permits, assessed and taxed land as residential, allowed foreclosure of outlots, and ultimately removed MSA reservations—each an affirmative action incompatible with corridor preservation.

Reliance on a corridor that exists only in historical tract indexing, is undiscoverable through parcel-based searches, and was never preserved through enforceable land-use mechanisms establishes a false environmental baseline. Environmental review must evaluate whether the corridor remains valid at all, rather than assume its continued existence despite decades of contrary governmental action.

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4. Absence of Preservation Action or Legal Designation

A 2004 resolution was referenced as supporting evidence for this project, however, public data responses indicate that no City Council resolution or formal action exists preserving

the outlots or corridor for roadway purposes. Recorded deeds for affected parcels contain **no transportation reservation or right-of-way designation**, and assessor records classify affected land as residential or vacant rather than transportation infrastructure.

This absence of formal preservation action reinforces the conclusion that the corridor was not treated as a viable or protected roadway location.

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5. Passage of Time and Reliance

As of the close of this comment period, approximately **26 years** have elapsed since the corridor was first mapped. During this period, residents relied on governmental approvals to finance, construct, and occupy homes in close proximity to — and in some cases within — the mapped alignment.

The EAW's framing improperly shifts responsibility to residents for building "near a planned corridor," when the City and County themselves authorized development inconsistent with any preserved transportation purpose. This mischaracterization affects the disclosure and evaluation of noise, safety, quality-of-life impacts, and the feasibility of avoidance alternatives. The EAW does not address the current land use in this regard.

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6. False Baseline and Predetermination

By treating the mapped eastside corridor as an established and preserved alignment, the EAW relies on a false baseline condition. This assumption improperly constrains the alternatives analysis, discounts avoidance options that would restore residential separation consistent with earlier planning intent, and contributes to predetermination by treating the corridor as a given rather than a choice requiring environmental justification. The 2000 official map was not tied to individual parcel IDs, was not carried forward through subsequent subdivision plats, and was not re-recorded against successor parcels. As a result, recorded deeds and parcel-level title records contain no transportation reservation or right-of-way designation, consistent with decades of subdivision approvals and residential construction within the mapped alignment.

Environmental review must evaluate whether the corridor remains valid at all — not assume its continued existence despite decades of contrary governmental action.

---

7. Required Disclosure and Corrective Analysis

To comply with MEPA, the RGU must:

- Disclose whether it contends the mapped corridor constitutes a preserved right-of-way;

- Identify the legal basis for that contention, if any;
- Explain how decades of residential development and plat approvals were authorized if preservation was intended; and
- Reevaluate environmental impacts, alternatives, and avoidance measures without reliance on an unsupported assumption that the corridor remained valid.

Absent this disclosure and reevaluation, the EAW is incomplete, misleading, and inadequate to support informed decision-making.

---

8. Conclusion

The County and City's reliance on a corridor it failed to preserve — and actively allowed to be built over — undermines the credibility of the environmental review. The EAW cannot lawfully proceed on the premise that a corridor exists where governmental actions demonstrate functional abandonment. This deficiency alone warrants corrective analysis and further environmental review, including preparation of an Environmental Impact Statement (EIS).

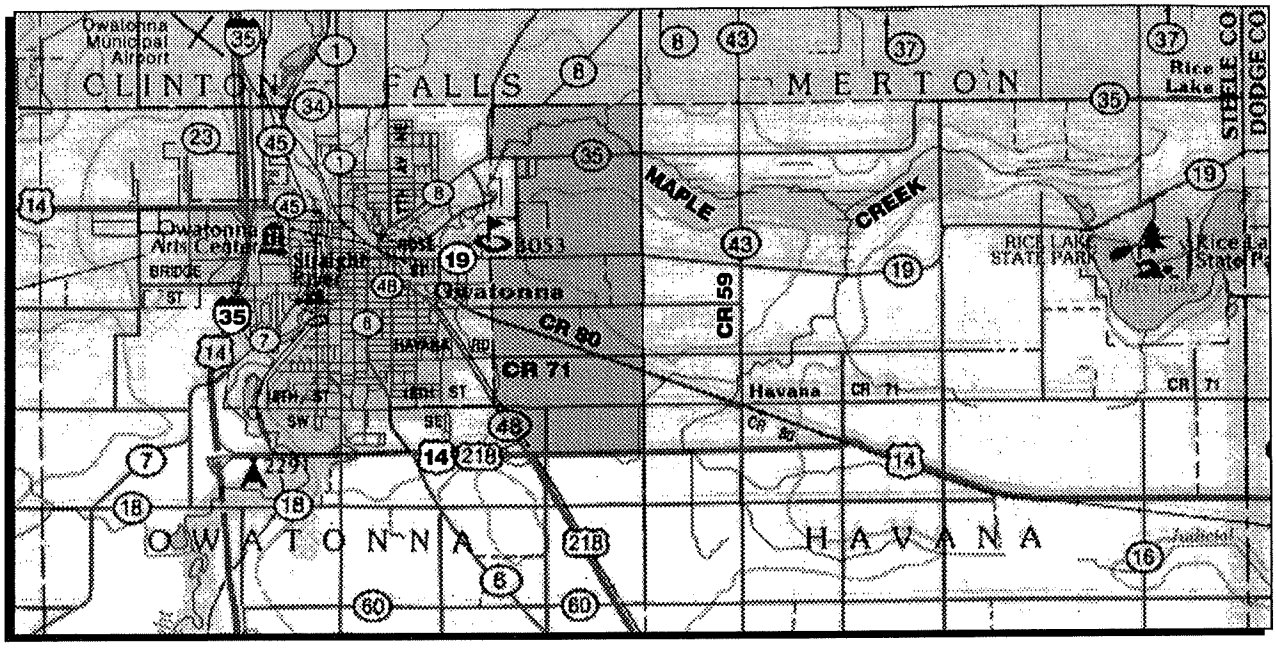
Attached Exhibits

- **Exhibit A** — Owatonna East Side Corridor Environmental Report (1995)
- **Exhibit B** — East Side Corridor Environmental Assessment Worksheet (1999)
- **Exhibit C** — Official Corridor Mapping (2000)
- **Exhibit D** — Joint Powers Agreement (February 2004)
- **Exhibit E** — U.S. Highway 14 Beltline Study (2004)
- **Exhibit F** — Official Beltline Maps and Corridor Studies (2009–2011)
- **Exhibit G** — North Country and Shady Hills Subdivision Plats and Parcel Maps
- **Exhibit H** — First Home Built on Mapped ROW (9/2004)
- **Exhibit I** — Representative Recorded Deeds (No Transportation or ROW Reservation)
- **Exhibit J** — Assessor Land Use Classification Records (Residential / Vacant)
- **Exhibit K** — City Public Data Response (No Resolution Preserving Corridor or Outlots)

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Exhibit A

Owatonna East Side Corridor
Environmental Report
March 1995



Prepared for:
City of Owatonna and Steele County

Prepared by:
Short Elliott Hendrickson Inc.

DRAFT

SHORT ELLIOTT HENDRICKSON INC.

SEH

MULTIDISCIPLINED.
SINGLE SOURCE.

The preferred alternative will ultimately be added to the County State Aid Highway (CSAH) roadway system.

D. Facility Type

The proposed east side corridor will combine urban and rural design sections within a right-of-way up to 150 feet. Access will be restricted to existing east-west routes including C.R. 8, 35, 19, 80, and 71. Bridging will be required for all alternatives crossing Maple Creek. Railroads will be intersected at-grade.

the other hand, tourist and recreational travelers are more interested in the cultural setting and natural attributes of the project area.

Step 5: Summary of Visual Impacts by Alternative

No-build Alternative

Neighbors

Residential neighbors, farm families, and ,to a certain degree commercial neighbors, will not be affected by the NO-BUILD Alternative in terms of visual impacts. Current conditions would continue.

Travelers

Traffic patterns would continue as a "spoke" into the central portion of Owatonna. Local E-W roadways would continue to function as they do today.

Build Alternatives

In relation to all the BUILD alternatives, the following comments can be made:

Neighbors

The viewer group most directly affected would be residential neighbors, scattered farmstead families, and local recreation users. These neighbors are closely associated with the east side of Owatonna and adjoining Township (Owatonna Township, Havanna Township) and County areas. The "viewshed" area is largely characterized by open farmed areas and smaller mixed forest and wetland sites (i.e. along Maple Creek).

Roadway development will impact these neighbors by incorporated a transportation facility through the area. Proper design and environmental sensitivity is necessary to avoid extensive adverse impacts.

Travelers

The new N-S roadway would create an added visual perspective by changing the current physical environment. The commuting traveler would experience a change from travel into Owatonna, to travel as a connecting link to the traffic pattern north and south of the Owatonna community. Proper design and environmental sensitivity is important to the traveler. Ease of the commuting and important local roadway links are beneficial.

Step 6: Mitigation and Enhancement of Visual Impacts

Mitigation is the use of techniques which would avoid, minimize, or compensate for the adverse impacts which would be caused by the BUILD alternative. Enhancement also defines and advances the opportunities for beneficial visual impacts.

Mitigation utilizing enhancement involves selecting feasible and effective "viewshed" considerations for the existing corridor area. The natural harmony, cultural order, and sense of design quality are all important elements.

Mitigation and Enhancement Techniques for Impacts to the Sense of Natural Harmony

- C Allow continued views of open and farmed areas outside of planned development areas;
- C Develop a landscaping plan to integrate the roadway into the surrounding natural and cultural environment;
- C Incorporate proper construction design to achieve the most visually acceptable and functional method for the roadway facility.

Mitigation and Enhancement Techniques for Impacts to the Sense of Cultural Order

- C Avoid neighborhood disruption and negative effects on community cohesion by properly locating the roadway to avoid extensive acquisition and relocation;
- C Investigate integrated pedestrian areas which will not disrupt use of existing neighboring properties but provide a pleasing, safe passage throughout the project area;
- C Appurtenances, all the non-structural items which are part of the roadway, should be visually coordinated and standardized. This includes signs, rails, fences, wall, berms, lights (if necessary), safety barriers, etc..

Mitigation and Enhancement Techniques for Impacts to the Sense of Design Quality

- C Provide a well-defined roadway surface showing continuous horizontal direction and movement;
- C Integrate a landscape plan that is functional and provides a connection in the project corridor;
- C Maple Creek Bridge. This is a key visual resource. The design and construction of the bridge should have features that are sensitive to the local natural and cultural environment. This includes design type, building materials, and colors.

Alternative D - This alternative requires 3 out of 4.5 miles of new alignment. At 54 acres, this removes $324 - $702 from the tax base. Four properties are triangulated by this alternative.

Right-of-Way/Relocation

Existing Conditions

Right-of-Way requirements will be 150-foot corridors for each alternative. Alternative A1 follows existing roadway for which the county owns 75 feet of right-of-way. Alternative D follows 2400 feet of existing roadway at the north end of the alternative and 5400 feet at the south end. Both existing roads are part of the county road system.

Impacts

No-Build Alternative - No land will be taken for this alternative.

Build Alternatives - The right-of-way impacts will all be on privately owned land. As discussed earlier, all alternatives run through farmland properties. The estimated right-of-way requirements for each build alternative are summarized in the table below.

Alternative A1, which is only 4/5 of a mile long and on existing alignment, requires 7.5 acres. This alternative would replace the north 1 mile of Alternative 1 (18.2 acres) thereby reducing the overall right-of-way requirements of Alternative 1 by 10.7 acres.

No relocations are expected, as all alignments bypass farmsteads located on quarter, half, and section lines.

D. Natural Environment

Air Quality

No-Build Alternative - Since the No-Build alternative is expected to result in congestion and delay in the central portions of the City, it will result in a negative impact on the air quality in the same areas where congestion and delay occur. These areas are primarily expected to occur along Mineral Springs Road west of St. Paul Road and Rose Street west of Grove Avenue.

Build Alternatives - Some relatively minor, temporary air quality impacts are anticipated resulting from the construction of any of the alternatives. The impacts would be due to emissions from the construction machinery. The construction equipment emissions will be minimal from the standpoint of carbon monoxide since the majority of the equipment is diesel powered.

Each of the Build alternatives will have minor long term impacts to nearby developments. Provided the roadway is build to avoid peak

hour congestion, no significant air quality changes are anticipated. Alternative A will have minor air quality impacts on the adjacent development along Greenhaven Lane. Both alternatives A and C will have minor impacts to the adjacent residential development just south of Maple Creek. All of the Build alternatives will have minor air quality impacts to the new development which occurs near the by-pass and to existing farmsteads near the by-pass routes.

Noise

No Build Alternative - Since the No Build Alternative results in significantly higher traffic growth on existing City streets than the Build Alternatives, it can be expected to have the most significant noise impact on existing City neighborhoods and for the downtown area.

Build Alternatives - The construction of any of the Build alternatives is anticipated to temporarily generate noise not typical in the area, with the exception of the operation some farm equipment. Most construction activities such as grading and truck hauling will be of a fairly short duration. The noisiest construction activities can be mitigated by restricting the hours of equipment operation and by ensuring that all equipment is properly muffled.

There will also be on-going noise from traffic on any of the Build alternatives. Alternative A will have the most significant noise impact, since it expected to carry the highest volume of all the alternatives. In addition, the traffic noise will impact existing residential development along Greenhaven Lane. Alternative C carries nearly as much traffic, but affects fewer adjacent residential units. Alternatives B and D are expected to carry significantly lower traffic volumes. Therefore, they will have less noise impact on nearby farmsteads and development, but will result in more traffic noise in the existing neighborhoods and downtown.

Biological - *Fisheries*

Existing Conditions

Fisheries data has been provided by the Minnesota Department of Natural Resources (MDNR) Lake City Office.

Maple Creek is a MDNR-protected stream. It is the only habitat for fisheries in the project study area. Maple Creek is a 16-mile long stream flowing east to the Straight River. It is classified as a Class III warmwater stream. The headwaters start about 5-7 miles east of the project area, on the north side of Steele County 19 and Rice Lake.

Table 4
Estimated Wetland Impacts By Area (acres)

Wetlands			Impacts by Alternative				
Wetland #	Type*	Size	A	A2	B	C	D
0	PEMA	0.83		0.13			
1	PFO1C	Maple Creek	0.80				
2	PFO1C	Maple Creek				1.27	
3	PFO1C	Maple Creek			0.61		
4	PFO1C	Maple Creek					0.51
5	PEMC	1.99					
6	PEMC	6.32					
7	PUBFhx	1.42					
8	PEMB	2.39					
9	PEMB	3.19					
10	PEMB	2.96					
11	PEMC	8.20				1.02	
12	PEMC	9.22			0.95		
13	PEMC	5.58					
14	PEMB	2.90	0.07				
		Total Impacts	**0.87**	**0.13**	**1.56**	**2.29**	**0.51**

* See Table 3 for definitions

potential for site location here is high. No one can predict the number of sites that might be located here, nor the size and significance of any given site.

There were two specific areas that were observed that will require particular attention at the time of the reconnaissance survey. The first is on the south end of Alternative A where it intersects with T.H. 218. There is a relatively confined area characterized by a rise which is unique in comparison to the surrounding rolling topography. The rise is covered in evergreen trees and it is unknown at this time if it has been disturbed by road construction or not. There may be evidence of burials here or there may be remnants of a farmstead which was dismantled at the time of road construction. In any case, this area will have to be carefully checked.

The second area of interest is also on Alternative A at the intersection of 18th Street. There is a farmstead on the southwest corner of that intersection. North of the buildings (toward 18th Street) is a wooded area, the topography of which is somewhat different than the surrounding area. This topographic variation is visible in the northeast quarter of Section 23 on the U.S.G.S. Topographic Map (Owatonna Quadrangle, 7.5 Minute Series, 1962). It is unknown whether or not this area has been disturbed, but it should be carefully checked for archaeological sites. There is also the possibility that burials may be found at this location.

The southern two-thirds of the proposed corridors are characterized by reasonably flat agricultural fields with intermittent farmsteads consisting in most cases of a house, barn, silo and several out buildings. Because the project maps that were supplied to Impact Services at the time of the cursory field observation did not specify whether or not any given farmstead would be impacted by construction or whether construction activity would circumvent the buildings, it was impossible to make any specific recommendations concerning the historic importance of any given property. Our assumption here is that construction plans will make every attempt to avoid farmstead buildings, where ever possible. Those properties that will indeed be impacted should be evaluated in order to determine if any aspect is of historic value.

RECOMMENDATIONS

1. There are no known archaeological sites recorded that will be impacted by construction of any of the four alternative routes. The southern two-thirds of each of the routes is topographically homogeneous and the likelihood of finding previously unknown archaeological sites here is the same for each route. Thus, the elimination of any given alternative route cannot be made on that basis of known archaeological concerns.

2. Because the area of highest potential for locating currently unknown prehistoric archaeological sites is in the vicinity of Maple Creek which is bisected by all four alternative routes, every effort should be made in the Maple Creek area to impact only

those areas which have already been disturbed by previous road construction. This would reduce the area that would require the Phase I reconnaissance survey.

3. The historic properties that are listed on the National Register of Historic Places are all located within the city limits of Owatonna and are well outside the area of impact by the four alternative routes. Thus, significant historic properties cannot be used as a basis for elimination of one route over another.

4. All historic properties (house, barn, silo or out-buildings) that will be impacted by road construction will have to be examined in order to determine their significance. Thus, the proposed route should avoid as many buildings as possible, thus, minimizing the extent of historic evaluation that would be necessary.

5. It is obvious that if the proposed route could use existing roads (areas where impact has already taken place from road construction), the possibility of impacting unknown archaeological sites would be minimal, thus, reducing the extent of archaeological evaluation that would be necessary.

6. Outside of the vicinity of Maple Creek, there are two areas outlined above that may contain archaeological/historical resources. The first is at the intersection of T.H. 218 and Alternative A and the second is at the intersection of 18th Street and Alternative A. Cursory inspection noted the unique characteristics of these two areas in comparison to the surrounding topography in addition to the possibility that neither area has been disturbed. They both should be avoided by construction activities if at all possible.

Exhibit B

Owatonna East Side Corridor

Environmental Assessment Worksheet

Prepared for

City of Owatonna, Minnesota
and
Steele County, Minnesota

March 8, 1999

The project is a 3.75 mile arterial roadway being the east segment of a "beltline" around the City of Owatonna. This east side corridor is linear in a north-south direction and intersects existing east-west arterials. The purpose of the corridor is to accommodate traffic from existing and anticipated future development on the northeast side of Owatonna.

7. **Project Magnitude Data**

Total Project Area (acres) _____ or Length (miles) 3.75

Number of Residential Units

Unattached N/A Attached N/A

Commercial/Industrial/Institutional/ Building Area (gross floor space)

Total N/A square feet;

Indicate area of specific uses:

Office	N/A	Manufacturing	N/A
Retail	N/A	Other Industrial	N/A
Warehouse	N/A	Institutional	N/A
Light Industrial	N/A	Agricultural	N/A
Other Commercial (specify)	N/A		
Building Height(s)	N/A		

8. **Permits and Approvals Required - List all known local, state, and federal permits, approvals, and funding required:**

Unit of Government	Type of Application	Status
Federal Highway Administration	Federal Assessment	To be Submitted
Federal Highway Administration	Design Approval	To be Submitted
U.S. Army Corps of Engineers	Section 404 Permit	To be Submitted
Minnesota Department of Natural Resources	Protected Waters Permit	To be Submitted
Minnesota Pollution Control Agency	Section 404 Water Quality Certification	To be Submitted
Minnesota Pollution Control Agency	NPDES Permit	To be Submitted
State Historic Preservation Office	Historical/Archaeological Clearance	To be Submitted
Steele County Soil & Water Conservation Dist.	Wetlands Conservation Act Permit	To be Submitted

9. **Land Use - Describe current and recent past land use and development on the site and on adjacent lands. Discuss the compatibility of the project with adjacent and nearby land uses; indicate whether any potential conflicts involve environmental matters. Identify any potential environmental hazard due to past land uses, such as soil contamination or abandoned storage tanks.**

The existing land use is residential and farmland. The proposed route triangulates three farm fields and there are four farm splits. The triangulation is proposed to avoid wetlands, allow a perpendicular intersection with an existing roadway and railroad and to create a separation to an existing residential development.

The presence of an east side bypass will allow future residential growth to be oriented to both the east/west roadways and the new north/south roadway through the use of residential collector streets. In this way, the presence of the bypass will decrease the dependence on future residential collector streets as north/south connections to the existing arterials in the study area.

10. **Cover Types - Estimate the acreage of the site with each of the following cover types before and after development (before and after totals should be equal):**

to existing City streets.

23. **Vehicle-related Air Emissions** - Provide an estimate of the effect on the project's traffic generation on air quality, including carbon monoxide levels. Discuss the effect of traffic improvements or other mitigation measures on air quality impact. (*If the project involves 500 or more parking spaces, consult "EAW Guidelines" about whether a detailed air quality analysis is needed*).

Since the "No Build" alternative is expected to result in congestion and delay in the central portion of the City, it will result in a negative impact on the air quality in the same areas where congestion and delay occur. These areas are primarily expected to occur along Mineral Springs Road west of St. Paul Road and Rose Street west of Grove Avenue.

The future CO concentrations are not expected to approach the state air quality standards of 3.0 parts per million (1-hour) or 9.0 parts per million (8-hour) for the proposed corridor. Based on the development patterns expected in the area, which will not be dense, the projected traffic volumes on the new corridor are not expected to experience significant delay or congestion. In fact, the south portion of the study area is expected to remain very rural. Traffic volumes in the range projected on the roadway are not as high as those which sometimes result in air quality standards being exceeded. The elevation and topography also contribute to whether or not CO builds up over time versus dissipating. The corridor does not have any significant low areas or topography which would result in "hot spots".

24. **Stationary Source Air Emissions - Will the project involve any stationary sources of air emissions (such as boilers or exhaust stacks)?** ☐ Yes ☒ No
If yes, describe the sources, quantities, and composition of the emissions; the proposed air pollution control devices; the quantities and composition of the emissions after treatment; and the effects on air quality.

25. **Will the project generate dust, odors, or noise during construction and/or operation?** ☒ Yes ☐ No
If yes, describe the sources, characteristics, duration, and quantities or intensity, and any proposed measures to mitigate adverse impacts. Also identify the locations of sensitive receptors in the vicinity and estimate the impacts on these receptors.

Some relatively minor, temporary air quality impacts are anticipated resulting from construction. The impacts would be due to emissions from the construction machinery. The construction equipment emissions will be minimal from the standpoint of carbon monoxide since the majority of the equipment is diesel powered.

The construction is anticipated to temporarily generate noise not typical in the area, with the exception of the periodic operation of some farm equipment. Most construction activities such as grading and truck hauling will be of a fairly short duration. The noisiest construction activities can be mitigated by restricting the hours of equipment operation and by ensuring that all equipment is properly muffled.

There will also be on-going noise from traffic on the new corridor. A "No Build" scenario will result in more traffic and more noise in the existing neighborhoods and in downtown Owatonna.

The design speed of the roadway and the amount of truck traffic will be the most important factors in whether or not he adjacent sensitive receptors will experience noise levels exceeding state and federal standards. The proposed roadway is planned to be separated form existing residences by approximately 800 feet. Landscaped boulevards and berms provide a soft, absorptive surface which helps reduce the amount of noise which reaches the sensitive receptors. The 150 foot right-of-way anticipated for this corridor will provide adequate space to design these absorptive surfaces if necessary.

26. **Are any of the following resources on or in proximity to the site:**
a. archeological, historical, or architectural resources? ☐ Yes ☐ No

Correspondence and a study report with regards to archeological, historical, or architectural resources is found in Appendix B. Further investigation will be conducted as feasibility and design stages of the project are undertaken.

b. prime or unique farmlands? ☒ Yes ☐ No
c. designated parks, recreation areas, or trails? ☐ Yes ☒ No
d. scenic views and vistas? ☐ Yes ☒ No
e. other unique resources? ☐ Yes ☒ No
If any items are answered **Yes**, describe the resource and identify any impacts on the resource due to the project. Describe any measures to be taken to minimize or avoid adverse impacts.

Farmland

Existing Conditions

Data come from the U.S. SCS prime, unique, and statewide important farmland ratings and the Steele County Atlas and Plat Book. Data were analyzed using aerial photo map overlays and Steele County Soil Survey mapping.

Future Development Assumptions

Future development assumptions for the east side of Owatonna were developed jointly with the City Planner of Owatonna. Based on past growth trends, information from the State Demographer's Office, and past growth projections by the City's Planning Department, population and household projections were made for the entire City. Of the overall household and population growth in Owatonna in the next 20 years, approximately 80 percent is expected to occur on the east side of the existing City limits, with development on the northeast side expected to outpace development to the central and south east. This results in development of nearly 2,600 households on the east side. Retail development of approximately 130,000 square feet was also assumed along Rose Street (CSAH 19). Due to the large amount of residential growth projected, it was logical to assume that some commercial/retail development would follow to meet the demand for goods and services created by the new neighborhoods. With input from City staff, Rose Street was selected as a potential location for such a development, because of the locations accessibility to both existing and new development.

d. If a, b, or c were marked **Yes**, discuss any cumulative environmental impacts resulting from this project and the other development.

31. **Other Potential Environmental Impacts - If the project may cause any adverse environmental impacts which were not addressed by Items 1 to 28, identify and discuss them here, along with any proposed mitigation.**

Vegetation

Existing Conditions

Data for this section come from aerial photography interpretation.

The majority of the project is cropland. Areas of noncrop vegetation are Maple Creek, wetlands, prairie roadside along C.R. 80, conservation reserve program (CRP) land, and scattered vegetated fencerows. No CRP land is impacted directly by any alternative.

Mitigation

Mitigation of natural vegetation losses can be carried out by revegetating right-of-way disturbed by construction. The Minnesota Department of Transportation Integrated Roadside Resource Management strategies will be implemented in this project. Essentially this involves revegetating with native prairie species from this ecoregion and managing accordingly.

32. **SUMMARY OF ISSUES** (*This section need not be completed if the EAW is being done for EIS scoping, instead, address relevant issues in the draft Scoping Decision document which must accompany the EAW.*) List any impacts and issues identified above that may require further investigation before the project is commenced. Discuss any alternatives or mitigative measures that have been or may be considered for these impacts and issues, including those that have been or may be ordered as permit conditions.

Issues

1. Reduced woodland vegetation along Maple Creek and natural vegetation along right-of-ways.
2. Removal of nonimpervious land that serves as wildlife habitat.
3. Impact on freshwater mussels and native prairie.
4. Impact on wetlands.
5. Impact on highly erodible soils.
6. Increased surface water runoff.
7. Increased traffic generation.
8. Noise impact on sensitive receptors within the corridor.
9. Impact on prime farmlands.

Mitigation Measures

1. Increase tree cover in nearby nonwooded sections of Maple Creek and revegetate right-of-ways.
2. Choosing the preferred alternative weighed impacts of wildlife habitat. Design of roadway will avoid these impacts to extent that is feasible.

3. Design of roadway will avoid impacts to areas containing mussels or native prairie, to the amount feasible, given their limited spatial extent.

4. Mitigation sequencing will be conducted for wetland impacts. Avoidance, minimization, and compensation in that order will be used.

5. All alternatives avoid highly erodible soils. Impacts to all other soil will be mitigated according to standard erosion control practices, including silt fences, check bales, and mulch/cover cropping.

6. Grass swales and detention ponds will be used to reduce runoff pollutants to acceptable levels. The location at which treated runoff enters nearby surface waters, including wetlands, will be chosen to avoid and minimize impact on sensitive ecological areas.

7. The preferred alternative is designed to provide relief to existing street system.

8. The 150 foot right-of-way anticipated for this corridor will provide adequate space to design absorptive surfaces to reduce amount of noise.

9. The preferred alternative is a best balance trying to minimize impacts in several areas including prime farmland.

CERTIFICATIONS BY THE RGU (all 3 certifications must be signed for EQB acceptance of the EAW for publication of notice in the EQB Monitor).

A. I hereby certify that the information contained in this document is accurate and complete to the best of my knowledge.
Signature _____

B. I hereby certify that the project described in this EAW is the complete project and there are no other projects, project stages, or project components, other than those described in this document, which are related to the project as "connected actions" or "phased actions", as defined, respectively, at MN Rules. pts. 4410.0200, subp. 9b and subp. 60.
Signature _____

C. I hereby certify that copies of the completed EAW are being sent to all points on the official EQB EAW distribution list.
Signature _____

Title of Signer Steele County Planning Director Date 3-9-99

Minnesota Department of Natural Resources

500 Lafayette Road
St. Paul, Minnesota 55155-40__

April 19, 1999

RECEIVED
APR 22 1999

Michael Caron, Planning Director
Steele County
630 Florence Avenue, P.O. Box 890
Owatonna, Minnesota 55060

Re: EAW for Owatonna East Side Corridor Project

Dear Mr. Caron:

The Minnesota Department of Natural Resources (MDNR) has reviewed the above-referenced project and provides the following comments for your consideration.

Generally, we believe that the proposed Owatonna belt line, of which this project is the east segment, will facilitate development and urban sprawl, and will result in substantial impacts to natural resources, as discussed below. The East Side roadway corridor as identified does not appear to be compatible with Steele County's Local Water Plan due to adverse impacts to wetlands and water quality. The corridor is also incompatible with the Minnesota Wetland Conservation Plan since the corridor will cause wetland losses, when alternatives that avoid wetlands are available.

Maple Creek is paralleled by existing county roads north and south of the valley. These routes provide good access to Interstate 35 and downtown Owatonna. They cross Maple Creek on an existing bridge and also connect with each other within a mile of the new crossing. The project could avoid impacts to Maple Creek and much of the wetland impact associated with this project by ending the road at County Road 35, rather than running it north and then west to County Road 8.

The EAW adequately describes existing land uses, but fails to address wildlife use, populations and habitats, except a brief mention of winter use. Maple Creek is a critical wildlife habitat area and corridor. The potential impacts to wildlife populations and habitats are inadequately described.

Although the proposed corridor does not bisect the Maple Creek Deer Wintering Area, it is adjacent to the area and would cross an important route for deer traveling to and from the wintering area. The Maple Creek valley is the largest deer wintering area in Steele County (in terms of both size and numbers of deer using it). The proposed corridor would also impact

winter habitats for other species, including economically important protected species such as wild turkey, ring-necked pheasant, muskrat, mink, raccoon, and red fox.

The EAW incorrectly notes that there are no listed mussel species associated with the corridor. Our records indicate that there is one species of special concern, the spike mussel (*Elliptio dilatata)* from Maple Creek near the corridor. Since there has been no thorough biological survey of Maple Creek or Steele County, the presence of endangered or threatened species such as Blanding's turtle (known from Maple Creek upstream of this proposed corridor) cannot be ruled out.

The area associated with Maple Creek also provides habitat and a travel corridor for numerous migratory species including economically important waterfowl. The corridor is habitat for numerous species of protected song birds including species exhibiting long term declines like the common yellowthroat. Again, the importance of the Maple Creek travel corridor cannot be over-emphasized.

Proposed mitigation for loss of woody cover along Maple Creek calls for additional planting of trees along shoreland areas that are presently in grassy cover. Natural grassy shorelines are also important habitats. Replacing one valuable habitat with another does not mitigate for habitat losses. Any planting for mitigation should target restoring disturbed areas such as lawns to natural habitats.

The discussion of wildlife impacts also fails to mention that the proposed corridor will bisect wetlands identified as numbers 6 and 7, including partial filling of wetland 7. The Wetland Conservation Act requires that wetland impacts be avoided where feasible. The EAW provides no compelling reason for not routing the corridor around these two basins, to avoid wetland impacts and to avoid having a roadway between these nearby basins. The road would unnecessarily increase habitat fragmentation and become a major barrier to movement for many aquatic species, especially amphibians and turtles. In addition, significant sedimentation can be expected during construction, even with best management practices in place. Icing salts, sands, oils and other pollutants associated with a road will cause water quality deterioration in basins within or near the corridor. The corridor should be planned to avoid these types of wetland and habitat impacts, even along the edges. There should be an adequate buffer between the corridor and wetland basins to preserve or improve water quality even during construction. The best means of avoiding wetland impacts is to preserve a corridor for a roadway that does not cross or fragment these wetlands and associated habitat areas. Since these wetland losses can be predicted in advance of any right of way acquisition, all wetland losses should be mitigated on site. Right-of-way acquisition and the proposed corridor should include drained wetlands that would be restored for mitigation.

Crossing the Highway 80/DM&E railroad right-of-way is very likely to destroy good quality prairie communities. These habitats are extremely rare in Minnesota and Steele County.

The bridge crossing of Maple Creek will require a MDNR Protected Waters permit. Also, all the alternatives identified in the EAW cross Maple Creek in a "detailed study area" for flood insurance purposes; increases in flood stage from a crossing interpreted to be of 0.1 foot or greater will require an amendment to the effective flood insurance study.

Because of the potential for this project to facilitate additional development in the area, the City and County should consider initiating a more comprehensive review, such as an Alternative Urban Areawide Review (AUAR) as provided for in Minnesota Rules 4410.3610. AUARs afford responsible governmental units (RGUs) the opportunity to proactively address the environmental issues associated with developing an area such that any potentially significant environmental effects are avoided. For more information on the AUAR process, please contact Jon Larsen of the Environmental Quality Board at (651) 296-3865.

Thank you for the opportunity to review this project. We look forward to receiving your record of decision and responses to comments. Minnesota Rules part 4410.1700, subparts 4 & 5, require you to send us your Record of Decision within five days of deciding this action. If you have any questions regarding these comments, please contact Ken Wald of my staff at (651) 296-4790.

Sincerely,

Thomas W. Balcom

Thomas W. Balcom, Supervisor
Natural Resources Environmental Review Section
Office of Management and Budget Services

c: Bret Anderson
Con Christianson
Larry Nelson
Don Nelson
Charles Kjos, US F&WS
Jon Larsen, EQB
David Strand, City of Owatonna

#990321-1
eawowato.wpd

Exhibit C

1 ✓ No. 280471

2

3

COUNTY OF STEELE

TO

PUBLIC

INFORMATIONAL ONLY STEELE COUNTY RECORDER

Date 2-10-2000

Time 3:00 P.M

Recording Fee: $ NC

Return To:

Laura Thrke - Steele County Auditor

RF: _____

PB: _____

Envelope (_____)

INFORMATIONAL COPY ONLY
STEELE COUNTY
RECORDER

A 280471 Pgs 1

COUNTY RECORDER
STEELE COUNTY, MN

Certified, filed and/or recorded on 02/10/2000 at 3:00 pm Fee:

Well Certificate
[ ] Received
[ ] Not required

Rose P. Branderhorst,
Steele County Recorder
by _____, Deputy

RESOLUTION PLACING EASTSIDE CORRIDOR ON OFFICIAL MAP

Commissioner **Peterson** offered the following Resolution and moved its adoption:

WHEREAS: Steele County and the City of Owatonna completed a traffic study and found the need for a roadway east of Owatonna running in a north-south direction for approximately four miles and,

WHEREAS: The alignment of the roadway was arrived at after considering environmental, social, cultural and economic impacts and,

WHEREAS: An Environmental Assessment Worksheet was completed and resulted in the negative declaration on the need for an Environmental Impact Statement and,

WHEREAS: A public hearing was scheduled and held and the notice of the public hearing was published and mailed pursuant to Minnesota Statutes.

NOW THEREFORE BE IT RESOLVED: That the Steele County Board of Commissioners ordain and adopt the placement of the Eastside Corridor on the Official Map and,

BE IT FURTHER RESOLVED: That the Steele County Surveyor shall prepare the Official Map, attest to it and record it with the Steele County Recorder.

Commissioner **Christianson** seconded the adoption of the resolution, and it was declared upon the following vote: Ayes: 4 Nays: 1

Adopted: June 22, 1999

STEELE COUNTY BOARD OF COMMISSIONERS

BY: _____

ATTEST:

_____
Steele County Auditor

CERTIFICATION

I hereby certify that the above is a true and correct copy of a Resolution duly passed, adopted, and approved by the County Board of said County on the 22nd day of June, 1999.

_____
Steele County Auditor

Filed with the Steele County Recorder's Office on the 10th day of February, 2000, as Document No. 280471. at 3:00 P.M. IN BOOK 13 OF PLATS PAGE 259.

ROSE P. BRANDERHORST, By: Duane K. Larson, Deputy
Steele County Recorder

(Seal)

NE 26TH STREET

S 89°46'26" E 522.90

16.5' AT&T FIBER OPTIC
RIGHT-OF-WAY EASEMENT

HERBERT
& DORIS
SWANSON

FLOOD FRINGE

1190

1180

1200

1210

1220

MAPLE CREEK

E. LINE OF
W1/2 OF NW1/4

W. LINE OF
E1/2 OF NW1/4

SEC 1 - 107

N 00°31'54" W
2723.51

WALKER DRIVE

CLARENCE &
BETTY SCHWARTZ

75'

NW1/4

JOHN &
SYLVIA PROKOPEC

150' EAST
SIDE CORRIDOR

HILL DRIVE

DANE ROAD

N 88°52'59" E 522.88

S 00°31'54" E
261.83

0 100 200 400

SHEET 1 OF 7 SHEETS

DANE ROAD

N 88°52'59" E 522.88'

S 00°31'54" E
261.83'

R=1900.00
Δ=20°11'02"
A=669.32

E. LINE OF
W1/2 OF SW1/4

W. LINE OF
E1/2 OF SW1/4

107

KENNETH
ANDERSON

SEC

SW1/4

S 19°39'08" W
1120.42'

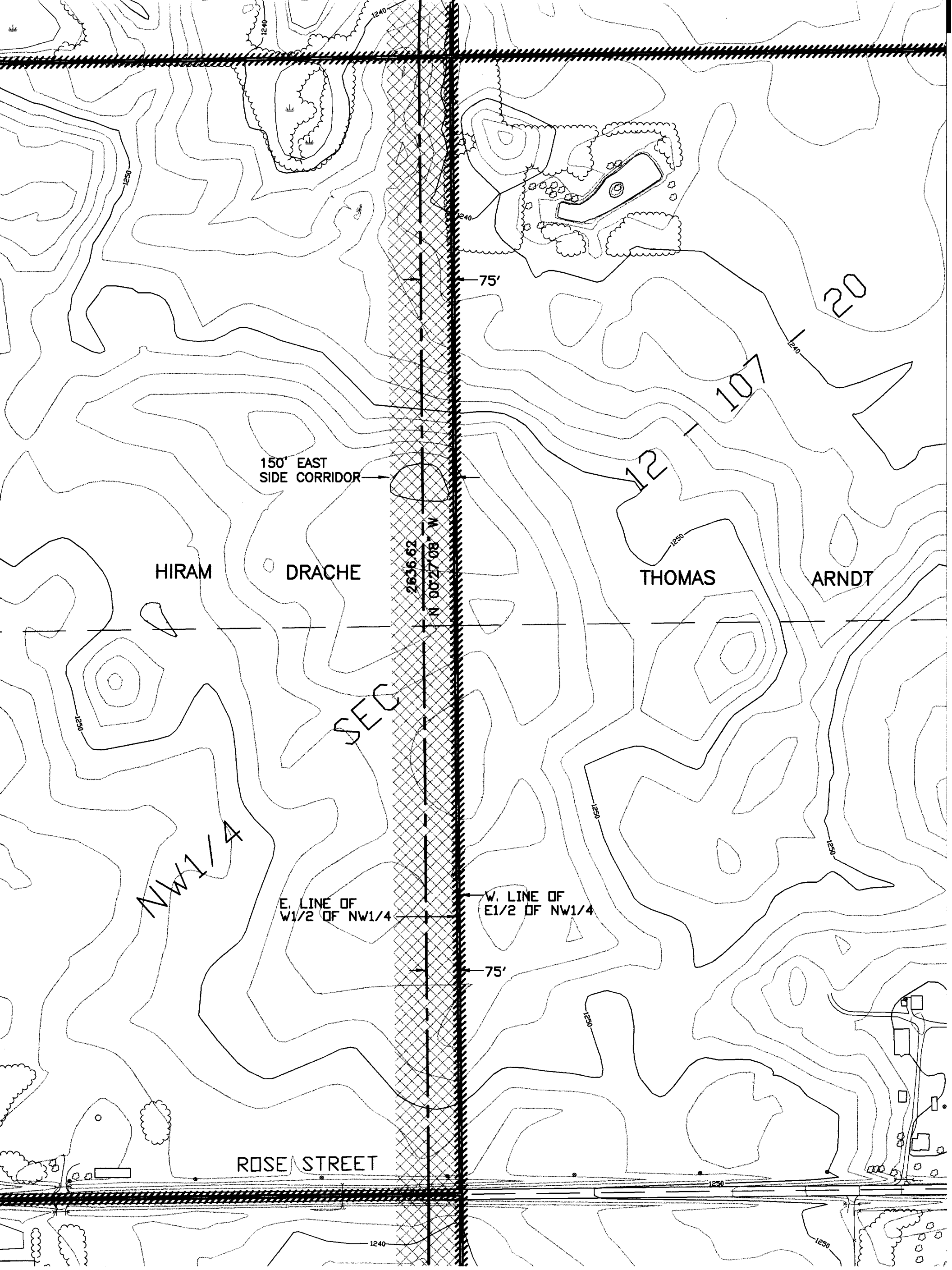
CLARENCE &
BETTY SCHWARTZ

R=1900.00
Δ=19°41'57"
A=653.25

16.5' AT&T FIBER OPTIC
RIGHT-OF-WAY EASEMENT

1210
1220
1230
1240
1250

0 100 200 400



0 100 200 400

SHEET 3 OF 7 SHEETS

ROSE STREET

JOSEPH &
LORRAINE PARTRIDGE

THOMAS ARNDT

ANNA SCHLINGER

SW1/4 SEC 12 T 107 R 20

N 00°09'25" E 1322.82

75'

E. LINE OF W1/2 OF SW1/4

W. LINE OF E1/2 OF SW1/4

150' EAST SIDE CORRIDOR

SCHOOL ST.

1250 1240 1230 1220 1210

0 100 200 400

150' EAST
SIDE CORRIDOR

SCHOOL ST.

MARCELLA A. MEIXNER

KEVIN DEML

1225.69
S 00°02'55" E

75'

E. LINE OF
W1/2 OF NW1/4

W. LINE OF
E1/2 OF NW1/4

S 89°23'15" W 77.64

ALLAN RADEL

R=1900.00
Δ=15°08'16"
A=501.99

S 15°05'21" W
370.65

S 80°49'28" E
225.09

N 69°54'35" W
253.20

R=1867.40
Δ=21°13'52"
A=691.97

300.55
N 89°28'16" E

CO. RD. 80

CHICAGO & NORTHWESTERN R.R.

CUMULUS BROADCASTING INC.

CO. RD. 71

1200

107 - 20

13 -

NW1/4

0 100 200 400

SHEET 5 OF 7 SHEETS

300.55
N 89°28'16" E

CO. RD. 71

1200

150' EAST
SIDE CORRIDOR

W. LINE OF
E1/2 OF SW1/4

E. LINE OF
W1/2 OF SW1/4

13 - 107 - 20

1210

1896.59
N 06°08'31" W

PICHNER

KEITH & EVELYN WANDREY

SEC

SW1/4

1220

R=2824.51
Δ=06°05'08"
A=300.00

349.86
S 00°03'23" E

SE 18TH STREET

0 100 200 400

SHEET 6 OF 7 SHEETS

SE 18TH STREET

S 00°03'23" E
349.86

75'

E. LINE OF
W1/2 OF NW1/4

W. LINE OF
E1/2 OF NW1/4

150' EAST
SIDE CORRIDOR

S 00°33'16" W
2099.61

JAMES & LAVONNE DUSEK

EUGENE & BETTY PICHNER

SEC 24

NW1/4

107 - 20

1220

U.S. 14

THIS MAP PREPARED AND RECORDED PURSUANT TO SECTION 394.35 AND 394.361 OF THE STATUTES OF THE STATE OF MINNESOTA.

This is to certify that I, John C. Hosfield, Steele County Surveyor, have prepared this Official Map of the Eastside Corridor according to the resolution adopted on June 22, 1999 by the Steele County Board of Commissioners and recorded on February 10, 2000 as document number 280471 in the Office of the Steele County Recorder.

2/15/00

John C. Hosfield
Steele County Surveyor
Registration No. 15231

0 100 200 400

SHEET 7 OF 7 SHEETS

SURVEY

EAST SIDE CORRIDOR

PART OF SECTIONS 1, 12, 13 & 24
T 107 N, R 20 W, STEELE COUNTY, MN

HOSFIELD & ASSOCIATES
415 WEST NORTH STREET
OWATONNA, MINNESOTA 55060
PHONE 507-451-4598 FAX 507-451-1396

SCALE 1"=200'	DWG BY BLK	FEBRUARY 2000	1748

04-9 Exhibit D

JOINT POWERS AGREEMENT

This Agreement made and entered into this 9th day of March, 2004, by and between the County of Steele (hereinafter referred to as "County") and the City of Owatonna (hereinafter referred to as "City"), bodies corporate and politic existing under the laws of the State of Minnesota.

WITNESSETH:

RECITALS

1. Two or more governmental units, by agreement entered into through action of their respective governing bodies, may cooperatively exercise any power common to each, pursuant to Minn. Stat. § 471.59; and,

2. Minn. Stat. § 394.361 authorizes the County to adopt an official map identifying land needed for future public uses and provides procedures for the grant or denial of land use permits on land so identified; and,

3. Minn. Stat. § 462.359 authorizes the City to adopt an official map to identify land needed for future public purposes and provide procedures for the grant or denial of land use permits thereon; and,

4. On February 10, 2000, the County duly recorded an Official Map, as document number 280471 in the office of the Steele County Recorder, identifying land necessary for highway purposes commonly known as the "East Side Corridor", a true and correct copy of which is attached hereto as Exhibit "A" and incorporated herein by reference; and,

5. The County and the City have determined that the lands so identified are necessary for a north-south inner corridor; and,

6. The County and the City agree that it is in the public interest and in furtherance of public purposes that the land so identified as the "East Side Corridor" be jointly administered in the manner authorized by statute made in such case provided;

NOW, THEREFORE, in consideration of the mutual promises and agreements contained herein, the City and the County agree as follows:

PROMISES

1. The County shall continue to maintain and keep on file the Official Map of the "East Side Corridor".

2. The County shall continue to administer the application for permits or approvals of buildings or other structures any owner desires to erect within the limits of the "East Side Corridor", where such property is located outside the City, pursuant to Minn. Stat. § 394.361, et. seq. In the event a building permit is denied by the County the owner may appeal to the County Board of Adjustment pursuant to Minn. Stat. § 394.361, subd. 4.

In the event that the County Board of Adjustment authorizes the issuance of a building permit the County shall provide the City with notice of the Board of Adjustment's decision authorizing the issuance of a permit to build within the "East Side Corridor.

In such event, the County delegates to the City the authority, pursuant to Minn. Stat. § 394.361, subd. 4, to elect, within six months of the decision of the Board of Adjustment, to institute proceedings on the City's behalf to acquire the land the City, in its discretion, deems necessary for the "East Side Corridor".

In the event the County Board of Adjustment denies the issuance of a building permit and the applicant thereafter commences legal action against the County based on the denial the City shall indemnify and hold harmless the County for those damages allowable under Minnesota Statutes Chapter 117, the eminent domain statute.

The County and City shall notify one another of any pending permit applications located within the limits of the "East Side Corridor".

3. Where the property for which a permit is sought lies within the City, the owner shall apply to the City for a permit and the matter shall be administered pursuant to Minn. Stat. § 462.359, et. seq.

4. The County hereby assigns its authority as described herein over and with respect to the lands identified as the "East Side Corridor" to the City and delegates to City the duty to administer the same pursuant to Minnesota Statute.

5. The City hereby accepts the authority as described herein assigned by the County and the duty delegated to administer the land so identified as "East Side Corridor" as the City in its discretion deems necessary for highway or street purposes.

6. Any notice required under this Agreement shall be in writing and delivered in person or b courier or mailed by certified mail, return receipt requested by United States Mail, postage prepared addressed as follows:

If to the City:

City Administrator
City of Owatonna
540 West Hills Circle
Owatonna, MN 55060

If to the County:

County Coordinator
County of Steele
630 Florence Avenue
P.O. Box 890
Owatonna, MN 55060

IN WITNESS WHEREOF, the parties have hereunder set their signatures the day and year first above written.

CITY OF OWATONNA

By: _____
Thomas A. Kuntz
Its Mayor

AND

By: _____
Greg L. Sparks
Its City Administrator

COUNTY OF STEELE

By: _____
Douglas G. Johnson
Its Chairman of the Board

AND

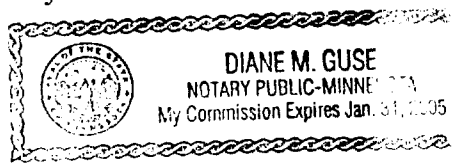
By: _____
Laura Ihrke
Its County Auditor

STATE OF MINNESOTA)
) ss.
COUNTY OF STEELE)

The foregoing was acknowledged before me this 2nd day of March, 2004, by Thomas A. Kuntz and Greg L. Sparks, the Mayor and City Administrator of City of

Owatonna, a municipal corporation under the laws of Minnesota, on behalf of the corporation.

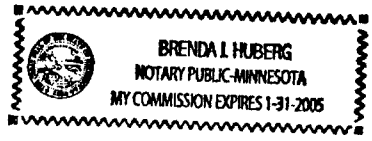
Diane M Guse
Notary Public



STATE OF MINNESOTA)
) ss.
COUNTY OF STEELE)

The foregoing was acknowledged before me this _____ day of March, 2004, by Douglas G. Johnson, Chairman, Steele County Board of Commissioners, and Laura Ihrke, Steele County Auditor.

Brenda J Huberg
Notary Public



THIS INSTRUMENT WAS DRAFTED BY:
Mark M. Walbran
WALBRAN, FURNESS & LEUNING
140 East Main Street
P.O. Box 273
Owatonna, MN 55060
Phone: (507) 451-1173

Exhibit E

US HIGHWAY 14 – OWATONNA BELTLINE STUDY
S.P. 7408-35
DRAFT ROADWAY SYSTEM PLAN REPORT

Bonestroo
Rosene
Anderlik &
Associates
Engineers & Architects

PREPARED BY:
BONESTROO, ROSENE, ANDERLIK & ASSOCIATES, INC.

FOR:
CITY OF OWATONNA
STEELE COUNTY
MINNESOTA DEPARTMENT OF TRANSPORTATION

1.0 Introduction

The City of Owatonna, Steele County and Minnesota Department of Transportation (Mn/DOT) have teamed up to study the proposed construction of a highway beltline system for the City of Owatonna and reconstruction on US Highway 14 (Highway 14).

A March 1995 study titled "Owatonna East Side Corridor Environmental Report" completed by Short, Elliot, Hendrickson, Inc. identified 26th Street North as the alignment for a north beltline. This report provides a recommendation for the location for the East Beltline and provides technical data to assist the City of Owatonna, Steele County and Mn/DOT determine if south and west beltlines are feasible. This report also provides recommendations for the expansion of Highway 14 from two to four lanes between Highway 218/County State Aid Highway (CSAH) 48 and the recommended East Beltline, the Highway 14/CSAH 45 intersection and the Highway 14/CSAH 6 intersection.

Many variables have been analyzed in the development of the recommendations contained in this report. Environmental elements including threatened or endangered species, historic properties, archaeological sites, existing hydrology and farmland impacts have been considered. Traffic projections based on development expectations have been calculated for the potential beltlines and surrounding roadways. Impacts to property owners and local opinions regarding the beltlines are also factored in the report recommendations.

2.0 Project Description and Location

This report is separated into East Beltline Option I, East Beltline Option II, West Beltline, South Beltline and Highway 14 improvements/intersection analysis sections (see Figure 1 in Appendix A for the project area).

East Beltline Option I

Located along 34th Avenue East and approximately 1 mile east of the City of Owatonna, this route is approximately 4 miles long and extends from SE 28th Street to CSAH 34 (26th Street North). In this option, 26th Street North would be extended east to connect to the East Beltline (see Figure 2 in Appendix A).

East Beltline Option II

Located approximately one mile east of East Beltline Option I, this option follows the alignments of County Road (CR) 59 and CSAH 43 (44th Avenue East). This option is also 4 miles long stretches between SE 28th Street and 26th Street North. As in East Beltline Option I, 26th Street North would be extended to the east to connect to this alignment (see Figure 3 in Appendix A).

West Beltline
This option starts near the CSAH 7/CSAH 18 intersection on the south and ends at 26th Street North on the northwest side of Owatonna. The West Beltline is four miles long and follows portions of existing 39th Avenue West (see Figure 4 in Appendix A).

South Beltline
Paralleling and about ½ mile south of Highway 14, CSAH 18, CR 18, and SE 28th Street have been designated as the beltline corridor for this route. The South Beltline is located between CSAH 7/39th Avenue West on the west and the East Beltline option for a total length of 5.5 or 6.5 miles (see Figure 5 in Appendix A).

Highway 14
This report includes analysis of the CSAH 45 and CSAH 6 intersections with Highway 14 and extension of the four lane section between Highway 218 and the recommended East Beltline. Highway 14 is located on the south side of Owatonna (see Figure 6 in Appendix A).

3.0 Project Purpose and Background

Currently, the City of Owatonna does not have a designated beltline system. If a person living on the southeast side of town needs to go west on Highway 14, they either have to go south to Highway 14 then backtrack to the north or weave their way through the city. Safety and congestion are becoming concerns for traffic traveling through the city as substantial growth is occurring with new housing developments to the north and east and new commercial/industrial developments to the west. The City of Owatonna, Steele County and Mn/DOT have agreed that planning is needed to preserve a beltline corridor around the city before developments encroach on the land that would be needed for the roadway, driving up the costs and complicating the development.

The 1995 study recommended the East Beltline be constructed at 24th Avenue East. However, current Mn/DOT standards require interchanges be separated by one mile or more. Since the existing Highway 218/Highway 14 interchange and 24th Avenue East are less than one mile apart, a new location for the East Beltline needs to be identified. This study will identify a new location for the recommended East Beltline. The 24th Avenue East corridor has been mapped on the Steele County official map and the City has assumed responsibility for constructing the road. It will be constructed as development warrants with access restrictions. No driveways will directly access 24th Avenue East and street spacing will be between 1/8th and 1/4th mile. The road will likely be constructed between Dane Road and 18th Street SE.

The West Beltline is being studied among significant commercial and industrial growth on the west side of Owatonna. When Highway 14 is extended west to Waseca on the south side of Owatonna, Mn/DOT anticipates a new interchange

5.1 East Beltline Option I

5.1.1 Existing Conditions

East Beltline Option I, which will be referred to as 34th Avenue East, has 2.25 miles of existing roadway in the corridor. 34th Avenue East is 1.5 miles long south of Havana Road and 0.75 miles long north of CSAH 35. The 1.75 miles between Havana Road and CSAH 35 is farmland. 34th Avenue East is a rural gravel roadway with a 66 foot wide right-of-way.

The 34th Avenue East crosses over Maple Creek on Bridge L-3908, a 17' wide curb to curb structure. Wash out areas are evident under the bridge at both abutments and extensive spalling, especially the underside of the deck, has resulted in large areas of exposed rebar. Steele County will be removing the bridge in the summer of 2005 and construct a new township road. The new road will not cross Maple Creek as the township bridge will not be replaced as part of this project. See Figure 11 in Appendix A.

34th Avenue East also crosses a judicial ditch and intersects the DM & E Railroad with an at-grade crossing.

There are 25 existing access points on 34th Avenue East. Eight of those are public roadways including CR 18, Highway 14, CSAH 39, CR 80 and Havana Road. It also intersects with CSAH 35, School Road and CSAH 19. The other access points include field entrances, a railroad crossing and farm/home driveways.

Utility companies with existing facilities near 34th Avenue East include: AT&T, Alliant Energy, Charter Communications, Onvoy, Owatonna Utilities, Aquila, Qwest, Steele County and the Steele/Waseca Cooperative Electric. Locations of the utilities will be required during design and before construction of the beltlines.

5.1.2 Future Conditions

a. Traffic Projections

The projected land use for areas adjacent to 34th Avenue East include single family and multifamily dwelling units. Approximately 4,000 vehicles per day are projected to travel the north section of 34th Avenue East if it is chosen as the East Beltline. Between Highway 14 and Havana Road 34th Avenue East will have approximately 5,500 vehicles each day. Only 500 vehicles per day are projected for 34th Avenue East south of Highway 14. See Figure 9 for the traffic analysis TAZ map, Figure 10 for the traffic forecast map and Appendix B for the trip calculation table.

6.0 Recommendations

6.1 East Beltline

This report recommends preserving both the 34th Avenue East and 44th Avenue East corridors for future roadway systems. Traffic forecasts completed with this study indicate 34th Avenue East would be utilized more than 44th Avenue East. Also, 34th Avenue East would impact fewer property owners and has fewer existing access locations. Based solely on those criteria, this report would recommend selecting 34th Avenue East for the East Beltline. However, factoring in desirable interchange spacing for safer and more efficient travel on Highway 14, planning for future growth more than 20 years away between 34th Avenue East and 44th Avenue East, and choosing a system that will have the full support of the local government units, this report recommends placing an interchange at 44th Avenue East and utilizing 44th Avenue East as the East Beltline because it is the better long term decision. 34th Avenue East could be converted into an internal collector to provide safe and efficient travel as Owatonna continues to grow. An overpass could be constructed at 34th Avenue East to provide access to properties south of Highway 14.

Mn/DOT will be preparing an Environmental Impact Statement (EIS) for Highway 14 between Owatonna and Dodge Center beginning in 2005. The EIS will study the overall roadway network including the area studied in this report. That document will provide the final determination of the East Beltline interchange with Highway 14.

This report also recommends grade separated crossings with the DM & E Railroad for both 34th Avenue East and 44th Avenue East.

6.2 West Beltline

This report recommends using the shown location as the West Beltline with several alternatives for the north segment of the beltline. The West Beltline could be realigned to the west to avoid businesses south of Highway 14 West and the food processing plant wastewater disposal properties. The preferred option would require the wastewater disposal property to be relocated so the West Beltline could travel straight north from Highway 14 West to 26th Street North and not include a second curve back to the west section line. All options include a grade separated crossing of the DM & E Railroad. See Figure 13 in Appendix A.

6.3 South Beltline

The option displayed in Figure 5 is the recommended option for a South Beltline. The alignment may need minor modifications to reduce impacts on existing homes adjacent to the alignment. CSAH 18/CR 18/SE 28th Street will be an alternate to traveling on Highway 14 for local trips. If an overpass isn't constructed at Highway 14/CSAH 6 (see information below regarding CSAH 6) the South Beltline will be the route traffic will take to CSAH 45 and Highway 218.

Table 5
Projected Noise Level Increases

		Daytime Noise Comparisons (dBA)					
		Existing		Post Construction		Increase in Noise Level	
Road Section	Distance From Road (feet)	L_{10}	L_{50}	L_{10}	L_{50}	L_{10}	L_{50}
CSAH-34 /	100	66.6	58.5	70.5	63.9	3.9	5.4
North Beltline	200	62.2	55.2	65.9	60.4	3.7	5.2
	300	59.9	53.1	63	58.2	3.1	5.1
	400	57.5	51.5	60.9	56.5	3.4	5.0
	500	55.8	50.2	59.2	55.1	3.4	4.9
	750	52.7	47.6	56	52.3	3.3	4.7
	1000	50.3	45.5	53.6	50.2	3.3	4.7
CSAH-18/	100	59.3	48.8	64.7	55.8	5.4	7.0
South Beltline	200	55.2	45.7	60.4	52.6	5.2	6.9
	300	52.7	43.7	57.7	50.6	5.0	6.9
	400	50.8	42.2	55.7	49	4.9	6.8
	500	49.3	41	54.1	47.8	4.8	6.8
	750	46.3	38.6	51.1	45.2	4.8	6.6
	1000	44.1	36.6	48.7	43.2	4.6	6.6
Existing	100	73.5	67.2	74.5	68.7	1.0	1.5
TH-14 West	200	68.8	63.7	69.8	65.1	1.0	1.4
of I-35	300	65.9	61.4	66.9	62.7	1.0	1.3
	400	63.8	59.7	64.7	61	0.9	1.3
	500	62.1	58.3	63	59.5	0.9	1.2
	750	58.9	55.5	59.8	56.7	0.9	1.2
	1000	56.5	53.3	57.4	54.5	0.9	1.2
Existing	100	72.1	65.2	74.9	69.2	2.8	4.0
TH-14	200	67.5	61.8	70.1	65.6	2.6	3.8
East of I-35	300	64.7	59.6	67.2	63.2	2.5	3.6
	400	62.5	57.9	65	61.4	2.5	3.5
	500	60.9	56.5	63.3	60	2.4	3.5
	750	57.7	53.8	60.1	57.2	2.4	3.4
	1000	55.3	51.6	57.7	55	2.4	3.4

around climate control can achieve acceptable indoor noise levels near most highways if the windows and doors are maintained closed, and in general have about a 33 STC (Sound Transmission Class) Rating.

Land Use Restrictions

Providing buffer zones between highways and noise sensitive land uses will reduce the noise impact of the project.

Site Planning

Placing buildings or other structures between the highway and areas designated for outdoor use is an effective noise mitigation measure.

Berms and Natural Barriers

Construction of berms or taking advantage of natural topographical barriers between the highway and the noise sensitive areas can be an effective noise mitigation strategy. Berms or other barriers must be high enough to obstruct the line-of-site between the noise receiver and the passing vehicles in order to be effective.

Speed Limits and Traffic Signals

Reducing travel speeds through the use of speed limits or the placement of traffic signals will reduce noise impacts. A reduction in travel speed by 10 mile per hour will reduce noise impacts by about 3 dBA.

Other strategies sometimes considered include heavy truck diversions or curfews, selection of quieter pavements, vegetation plantings, and control of vehicle source emissions.

9.2.2 Noise Walls

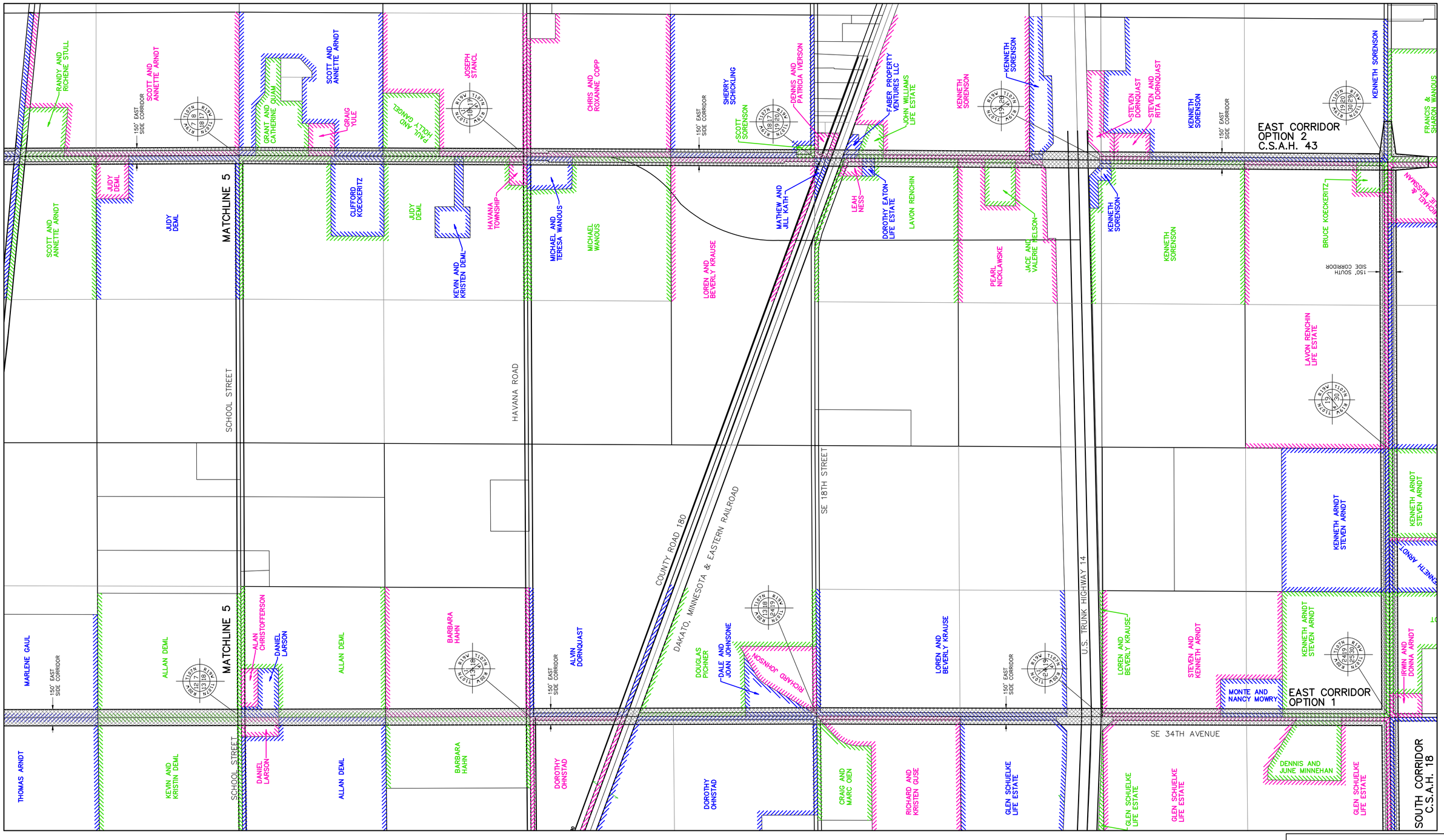
For Mn/DOT to consider the erection of a noise wall, one of the following factors must exist:

- The noise levels in a neighborhood are presently in excess of the applicable noise standards.
- The predicted noise levels in a neighborhood are expected to be in excess of the applicable noise standards for the design year of the project. Mn/DOT usually considers the design year to be 20 years after the start of construction.
- The noise levels in a neighborhood are predicted to be "substantially" above current noise levels in the project design year. "Substantial is defined as 5 dBA or greater.
- The predicted noise level approaches or exceeds the acceptable limit. Approaching is defined as the predicted level being within 1 decibel from the limit.

In order for a noise wall to be considered by Mn/DOT or FHWA it must be able to be constructed at a "reasonable" cost. "Reasonable" cost is currently defined by Mn/DOT as $3250/dBA. This is determined by dividing the total cost of a wall (currently estimated at $15 per square foot) by the total decibel reduction for residences that are predicted to receive at least a 5 dBA reduction.

Relatively dense residential areas that are close to highways are the most likely to meet this "reasonable" cost requirement.

Exhibit F



PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

SURVEY

EAST CORRIDOR

PART OF SEC 12, 13, 24 & 25-107-20 & 7,8,17,18,19, 20, 29 & 30-107-19, STEELE COUNTY, MN

JONES, HAUGH & HOSFIELD
PROFESSIONAL ENGINEERS & LAND SURVEYORS
415 WEST NORTH ST
OWATONNA, MN 55060
PH (507) 451-4598
FAX (507) 451-1396
515 S WASHINGTON AVE
ALBERT LEA, MN 56007
PH (507) 373-4876
FAX (507) 373-1839

SCALE 1"=400'	DWG BY BLK	AUGUST 2009	FILE NO. 1900
			JOB NO. 09-1079
			SHEET 4 OF 7 SHEETS

EAST CORRIDOR
OPTION 2
C.S.A.H. 43

MATCHLINE 6

MATCHLINE 5

EAST CORRIDOR
OPTION 1

MATCHLINE 6

MATCHLINE 5

SPRINGER FAMILY LIMITED PARTNERSHIP

DIETZ LAND COMPANY LLC

ALTSMAE WILDIN

PATRICIA LEWIS

JEROME FARIBO FARMS, INC.

SCOTT AND ANNETTE ARNDT

RANDY AND RICHENE STULL

GRANT AND CATHERINE QUAM

CLIFFORD KOECKERITZ

CLIFFORD AND LOIS YULE

CLIFFORD YULE

DONALD AND MAXINE ANTL

GERALD TALLEY

JAMES AND KAREN KILLEN

JUDY DEML

150' EAST SIDE CORRIDOR

150' NORTH SIDE CORRIDOR

C.S.A.H. 35

C.S.A.H. 19

SCHOOL STREET

LLOYD & VICKI WIMER

JOHN VIERLING

GLEN EDIN

BURDETTE BROUGHTEN

GALLAGHER

JOHN AND JUDITH SHERRELL

STERLING WENDLANDT

MARLENE GAUL

ALLAN DEML

ALAN CHRISTOFFERSON

DANIEL LARSON

ZANDRA ZWEBEL

FUTURE NE 26TH STREET

RUSSEL AND ELISE BECK

THOMAS ARNDT

ROSE STREET

KEVIN AND KRISTIN DEML

0 200 400 800

PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

SURVEY

EAST CORRIDOR

PART OF SEC 36-108-20 & 31-108-19 & 1,12 & 13-107-20 & 5,6,7,8,17 & 18-107-19, STEELE COUNTY, MN

JONES, HAUGH & HOSFIELD
PROFESSIONAL ENGINEERS & LAND SURVEYORS
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FAX (507) 373-1839

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			JOB NO. 09-1079
			SHEET 5 OF 7 SHEETS

DON VON RUDEN
DEAN VON RUDEN
BETTY JEPSON
JAMES SCHAFDER
150' NORTH SIDE CORRIDOR
NOEL BEULAH
NW 26TH STREET
OWATONNA CLINIC–MAYO
OWATONNA AREA HOSPICE, INC
ALLINA HEALTH SYSTEM
OWATONNA CLINIC–MAYO
C.S.A.H. 23
INTERSTATE 35
C.S.A.H. 45
MARK AND DONNA IHLENFELD
FESTAL FARMS INC
SOUTHERN MINNESOTA CONSTRUCTION COMPANY
100' NORTH SIDE CORRIDOR
MATCHLINE 8
NW 26TH STREET
STEELE COUNTY
MATCHLINE 9
JOHN AND KATHLEEN IHLENFELD
XCEL ENERGY INC
IVAN NIELSEN
NORTH CORRIDOR
C.S.A.H. 34
JAMES RUNDQUIST
HARVEST LANE PROPERTY OWNERS
N M C PROPERTIES LLC
150' WEST SIDE CORRIDOR
ELLA JEPSON
BETTY JEPSON

AGRICULTURE
SOUTHERN MINNESOTA CONSTRUCTION
SOUTHERN MINNESOTA CONSTRUCTION
SOUTHERN MINNESOTA CONSTRUCTION
LUNDIN CONSTRUCTION CO.
C.S.A.H. 1
ST PAUL ROAD
100' NORTH SIDE CORRIDOR
BRUCE AND BETTY BUSHO
GOOD SHEPHARD LUTHERAN CHURCH
HEMLOCK AVE
NORTH CORRIDOR
C.S.A.H. 34
C.S.A.H. 8
MATCHLINE 7
FRANK SPRINGER
100' NORTH SIDE CORRIDOR
JAMES AND ERLISS GRASS
FRANK SPRINGER
PAUL WATKINS
MIKE NECHANICKY
100' NORTH SIDE CORRIDOR
MATCHLINE 8

PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

0 200 400 800

SURVEY

NORTH CORRIDOR

PART OF SEC 31,32 & 33-108-20 &
4,5 & 6-107-20, STEELE COUNTY, MN

JONES, HAUGH & HOSFIELD
PROFESSIONAL ENGINEERS & LAND SURVEYORS
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FAX (507) 451-1396
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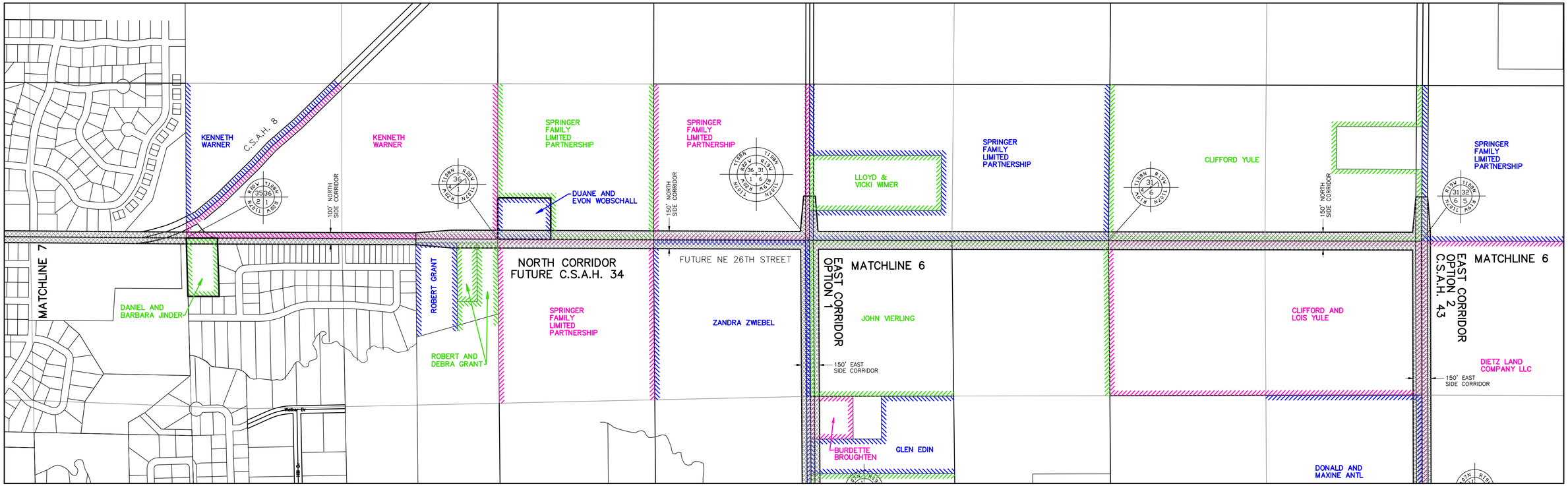
PH (507) 373-4876
FAX (507) 373-1839

SCALE 1"=400' | DWG BY BLK | AUGUST 2009 | FILE NO. 1900 | JOB NO. 09-1079 | SHEET 7 OF 7 SHEETS



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PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

SURVEY

NORTH CORRIDOR

PART OF SEC 25 & 36-108-20 & 1 & 2-107-20 & 31 & 32-108-19 & 6 & 5-107-19, STEELE COUNTY, MN

JONES, HAUGH & HOSFIELD
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SCALE 1"=400'	DWG BY BLK	AUGUST 2009	FILE NO. 1900
			JOB NO. 09-1079
			SHEET 6 OF 7 SHEETS

Exhibit

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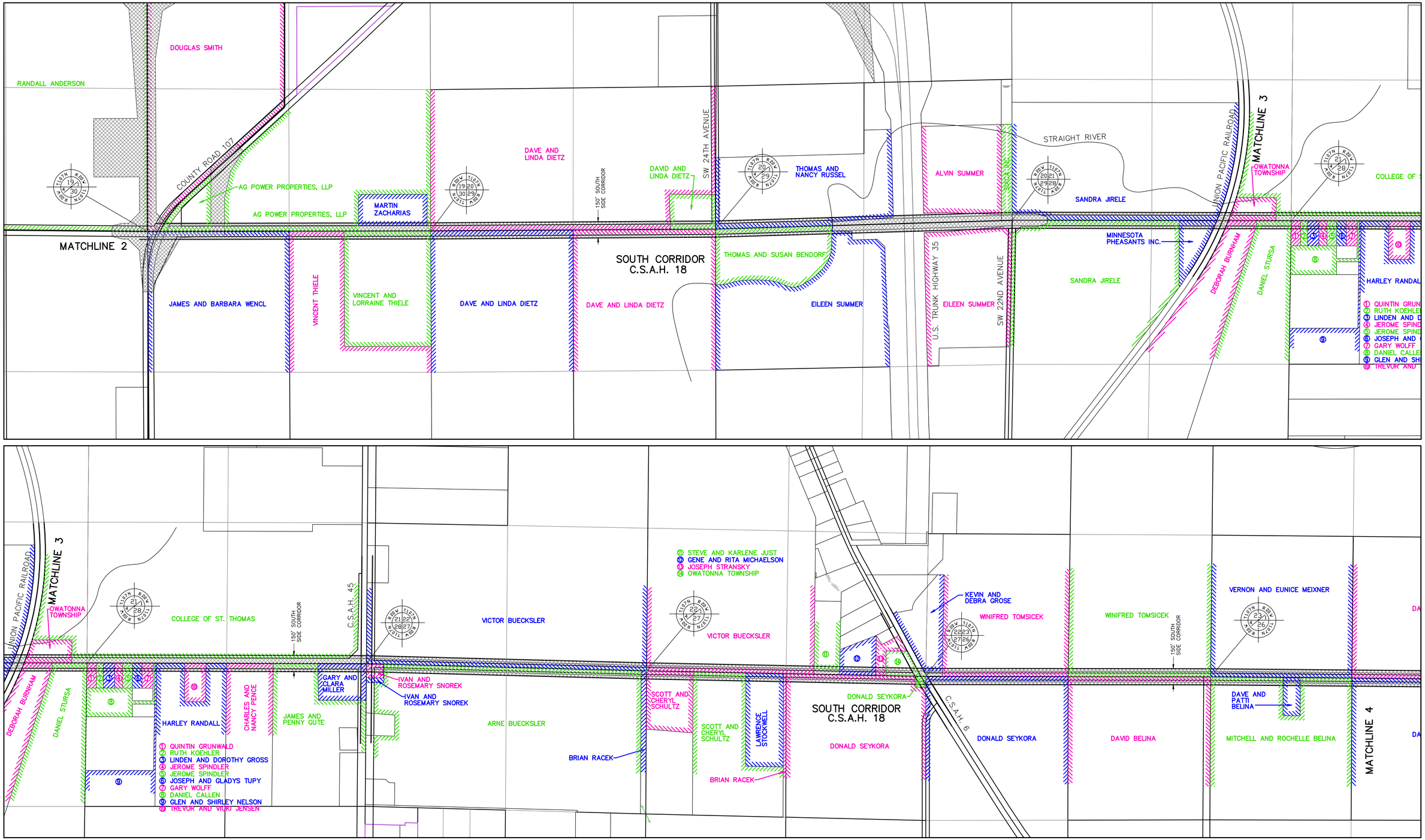

PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

SURVEY

SOUTH CORRIDOR

PART OF SEC 31-108-20 & 6,7,18,19, 30-107-20, STEELE COUNTY, MN

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FAX (507) 373-1839

SCALE 1"=400'	DWG BY BLK	AUGUST 2009	FILE NO. 1900
			JOB NO. 09-1079
			SHEET 2 OF 7 SHEETS

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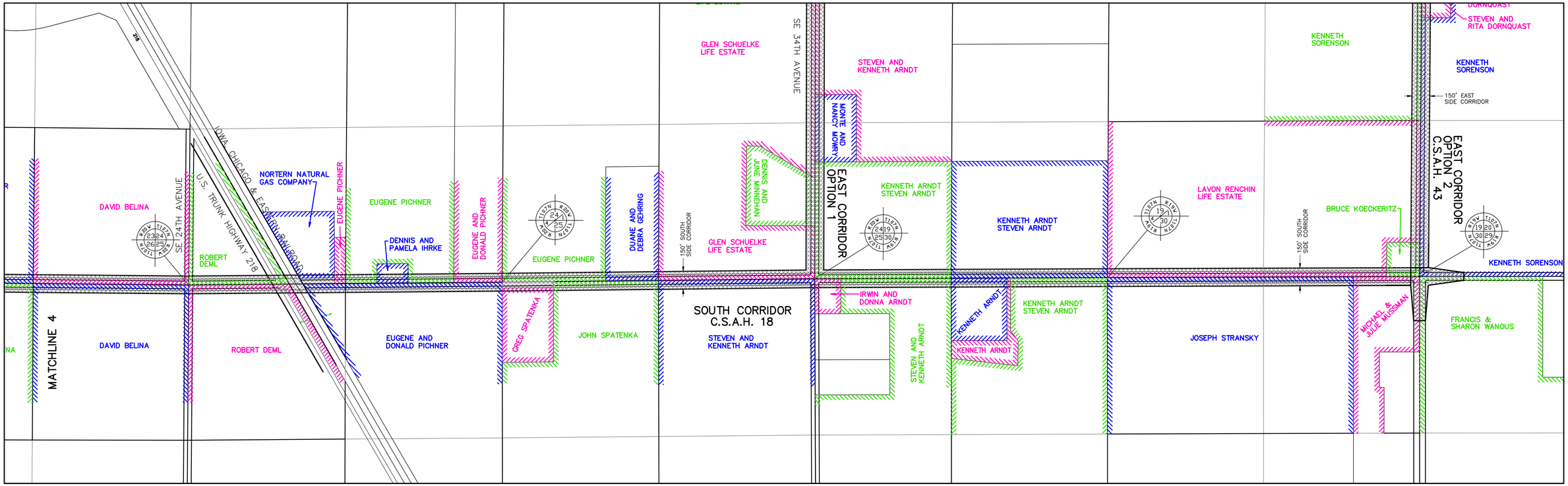

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PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

SURVEY

SOUTH CORRIDOR

PART OF SEC 19,20,29 & 30-107-19 & 19,20,21,22,23,24, 30,25,26,27,28,29-107-20, STEELE COUNTY, MN

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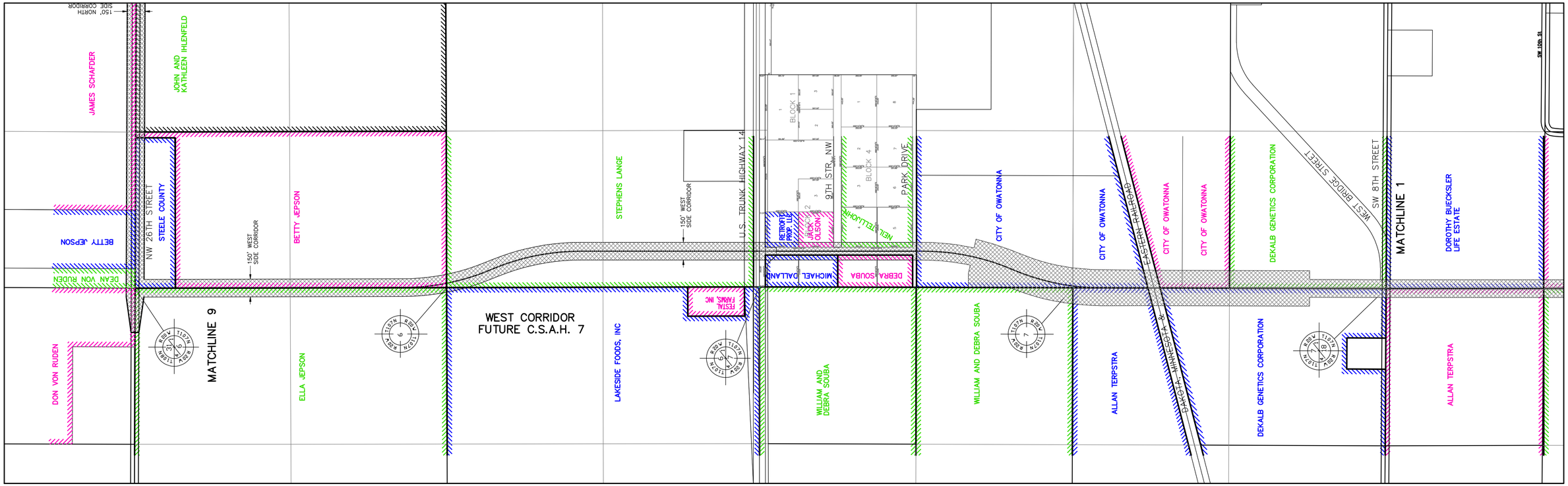
			SHEET 3 OF 7 SHEETS



PROPERTY OWNERS AS SHOWN WERE OBTAINED FROM THE STEELE COUNTY WEB SITE

THIS MAP PREPARED AND RECORDED PURSUANT TO SECTION 394.35 AND 394.361 OF THE STATUTES OF THE STATE OF MINNESOTA.

This is to certify that I, John C. Hosfield, Steele County Surveyor, have prepared this Official Map of the east beltline options 1 and 2, the north beltline, west beltline and south beltline corridors according to the resolution adopted on February 8, 2005 by the Steele County Board of Commissioners and recorded on , 2009 as document number in the Office of the Steele County Recorder.

John C. Hosfield
Steele County Surveyor
License No. 15231

SURVEY

WEST CORRIDOR

PART OF SECTIONS 6, 7, 18 & 19-107-20
STEELE COUNTY, MN

JONES, HAUGH & HOSFIELD
PROFESSIONAL ENGINEERS & LAND SURVEYORS
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PH (507) 373-4876
FAX (507) 373-1839

SCALE 1"=400'	DWG BY BLK	AUGUST 2009	FILE NO. 1900
			JOB NO. 09-1079
			SHEET 1 OF 7 SHEETS

Exhibit G

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Tax Parcel Viewer

0 0.01 0.02 0.04 mi

October 13, 2023

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Tax Parcel Viewer

0 0.01 0.02 0.04 mi

October 14, 2023

Steele County Assessor
Minnesota

Exhibit H

Parcel Detail: 17-573-0220

Parcel Number:	17-573-0220
Deed Holder:	WISTE/GREGORY A & KARI R
Property Address:	2545 MOSSY CREEK DR NE OWATONNA, MN 55060 Map This Address
Mailing Address:	2545 MOSSY CREEK DR NE OWATONNA, MN 55060 USA
PDF:	Owatonna
Class:	Residential
Tax District:	0761
Zoning:	Single Family Residential
Sec-Twp-Rng:	12-107-20
Lot-Block:	00-00
Deeded Acres:	0.0000
Tax Description:	BLK 2 LOT 20 NORTH COUNTRY ADDN
Property Report:	Property Report (PDF file)

Applications & Exemptions

***Note:** If any changes are entered on the forms, the Assessor's office will call to confirm them before completing.

Valuation

Year	Land Value	Dwelling Value	Improvement Value	Total Value
2025	$59,800	$293,300	$0	$353,100
2024	$55,500	$281,400	$0	$336,900

+ More Years...

Land Front Foot Information

Lot	Front	Rear
Main Lot	93.00	93.00

Total Square Feet: 14,880 **Total Acres:** 0.340

Residential Building Information

Occupancy	Style	Year Built	Total Living Area
− Single-Family / Owner Occupied	Split Foyer Frame	2004	1,376

Building

Occupancy:	Single-Family / Owner Occupied
Year Built:	2004
Style:	Split Foyer Frame
Area:	1,268
TLA:	1,376
Basement:	Full
Heating:	FHA - Gas
AC:	Yes
Attic:	None

Room Count

Bedroom Count:	3

Building Descriptions

Foundation:	C Blk
Exterior Walls:	Vinyl
Roof:	Gable/Asph
Architectural Design:	N/A

Occupancy	Style	Year Built	Total Living Area

Plumbing

Style	Count
Standard Bath - 3 Fixt	2
Shower Stall Bath -3 Fixt	1
Sink	1

Basement Finish

Description	Area	Units	Range
Living Qtrs. (Multi)	1,156	Table	Avg

Porches

SF Area	Style	Bsmt SF	Qtrs SF	Qtrs Style	Qtrs AC
24	1S Frame Open	0	0	Frame	Yes

Decks and Patios

Style	SF Area
Vinyl/CompoDeck	288

Garage 1 of 1

Year Built:	2004
Style:	Att Frame
Area:	1,020
Basement SF:	0
Int Fin Style:	Finished Minimal
Int Fin Pricing:	Average
Int Fin Area:	1,020
Qtrs Over Style:	None
Qtrs Over SF:	0

Sale Information

Sale Date	Amount	Sales Condition Codes	Recording
+ 07/23/2015	$198,850	000 - NORMAL ARMS-LENGTH TRANSACTION SALE	1535
+ 01/24/2011	$0	101 - TRANSACTION WITH NO CRV	13/43

Sale Date	Amount	Sales Condition Codes	Recording
+ 04/30/2010	$144,000	021 - BANK SALE (INCLUDING HUD), AND LENDING INSTITUTION SALES NOT EXPOSED TO MARKET	
− 09/01/2004	$203,572	007a - PHYSICAL CHANGE/NEW CONSTRUCTION (AFTER ASSESSMENT DATE; BEFORE SALE)	

Sales Detail

Buyer:	FARR/RODNEY N
Seller:	BRANDENBURG/RANDAL
Sale Date:	09/01/2004
Sale Amount:	$203,572
Sale Type:	Deed
Sales Code:	007a - PHYSICAL CHANGE/NEW CONSTRUCTION (AFTER ASSESSMENT DATE; BEFORE SALE)
Recording:	Tapestry Land Records
eCRV ID:	382488 - eCRV Search
Additional Information:	Sale Information

− 12/01/2003	$28,000	000 - NORMAL ARMS-LENGTH TRANSACTION SALE	

Sales Detail

Buyer:	FARR/RODNEY N
Seller:	JFJ DEVELOPMENT, L
Sale Date:	12/01/2003
Sale Amount:	$28,000
Sale Type:	Deed
Sales Code:	000 - NORMAL ARMS-LENGTH TRANSACTION SALE
Recording:	Tapestry Land Records
eCRV ID:	382488 - eCRV Search
Additional Information:	Sale Information

Building Permit Information

Date	Number	Tag Descr	Tag Date	Amount	Reason
11/03/2016	2016-01636	No	01/01/2017	1,350	Water Heaters
10/20/2010	1001729	No	01/01/1900	500	Fence
07/30/2010	1001066	No	01/01/1900	500	Garage Alteration
06/21/2010	1000818	No	01/01/1900	25,000	Building Alteration
06/02/2005	0500804	No	01/01/1900	4,479	Deck
01/15/2004	0400057	No	01/01/1900	148,210	New Const, Sing-Fam
01/15/2004	0400058	No	01/01/1900	6,300	Building Alteration
01/15/2004	0400059	No	01/01/1900	6,200	Building Alteration

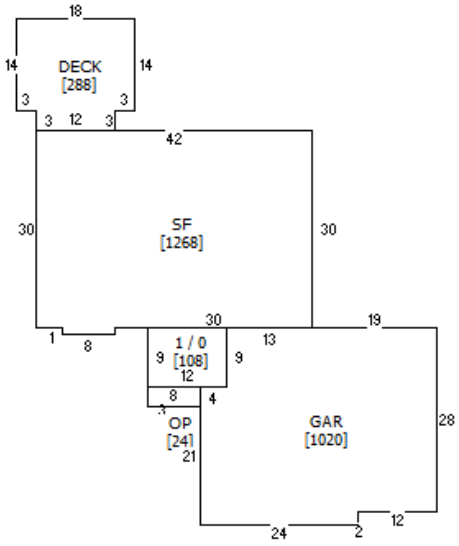
Taxation

For further tax information and/or to pay your current taxes

Payable Year	Classification / Homestead	Estimated Market Value	Taxable Market Value	Tax Capacity	Special Assessments	Total Tax
2025	RESIDENTIAL-HOMESTEAD	$336,900	$320,671	$3,207	$64.00	$4,840.00
2024	RESIDENTIAL-HOMESTEAD	$322,000	$313,740	$3,137	$64.00	$4,754.00

+ More Years...

Sketch



Sketch for PIN 17-573-0220

Administration Login • Terms of Use
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Exhibit I

No delinquent taxes and transfer entered: Certificate of Real Estate Value (✓) filed (—) not required
Certificate of Real Estate Value No. 27954
November 2, 2018
Laura Sheka
County Auditor
by Nancy Leitz
Deputy

8027709
Tx:4028175

A000420967
OFFICE OF THE COUNTY RECORDER
STEELE COUNTY, MINNESOTA
CERTIFIED, FILED, AND/OR RECORDED ON
11/05/2018 10:06 AM
WELL CERTIFICATE RECEIVED: N
PAGES: 2 FEES: 85.60
MORTGAGE TAX: 0.00 RECEIPT #: 0
STATE DEED TAX: 39.60
RICK G. KVIEN
STEELE COUNTY RECORDER
BY: MELISSA T

(Top 3 inches reserved for recording data)

LIMITED WARRANTY DEED
Business Entity to Business Entity

eCRV number: 889740

DEED TAX DUE: $39.60

DATE: November 1, 2018

FOR VALUABLE CONSIDERATION, **United Prairie Bank**, a banking corporation under the laws of Minnesota ("**Grantor**"), hereby conveys and quitclaims to the **City of Owatonna**, a municipal corporation under the laws of Minnesota ("**Grantee**"), real property in Steele County, Minnesota, legally described as follows:

Lot 1, Block 4, North Country Addition No. 3; AND
Outlots A and B, North Country Addition No. 3; AND
Outlot A, North Country Addition No. 2; AND
Outlots A and B, Emerald Acres No. 3

Check here if all or part of the described real property is Registered (Torrens) ☐

together with all hereditaments and appurtenances belonging thereto.

This Deed conveys after-acquired title. Grantor warrants that Grantor has not done or suffered anything to encumber the property, EXCEPT:

No encumbrances

Check applicable box:

☒ The Seller certifies that the Seller does not know of any wells on the described real property.

☐ A well disclosure certificate accompanies this document or has been electronically filed. (If electronically filed, insert WDC number: [...].)

☐ I am familiar with the property described in this instrument and I certify that the status and number of wells on the described real property have not changed since the last previously filed well disclosure certificate.

Grantor

UNITED PRAIRIE BANK

By: _____ 10-3 11-1-18
Joshua L. Burgess
Its: Market President

17-594-0401 17-593-0002
17-594-0002
17-594-0001
17-582-0001
17-593-0001

State of Minnesota, County of Steele

This instrument was acknowledged before me on November 1, 2018, by Joshua L. Burgess as Market President of United Prairie Bank, a Minnesota banking corporation.

(Stamp)
MARK R. CARVER
Notary Public-Minnesota
My Commission Expires Jan 31, 2020

_____
(signature of notarial officer)

Title (and Rank): _____

My commission expires: _____
(month/day/year)

THIS INSTRUMENT WAS DRAFTED BY:

David L. Einhaus
Einhaus, Mattison, Carver & Haberman, P.A.
202 North Cedar P.O. Box 545
Owatonna, Minnesota 55060
(507) 451-3580
E18-732

TAX STATEMENTS FOR THE REAL PROPERTY DESCRIBED IN THIS INSTRUMENT SHOULD BE SENT TO:

City of Owatonna
540 West Hills Circle
Owatonna, Minnesota 55060

Exhibit J

Steele County Assessor

Assessor Hub provided by Vanguard Appraisals, Inc

Parcel Number:
17-582-0001
Deed Holder:
CITY OF OWATONNA
Property Address:

Mailing Address:
540 WEST HILLS CIRCLE
OWATONNA, MN 55060 USA
PDF Name:
EXEMPT PROPERTY
Class:
EXEMPT
Tax District:
0761
Zoning:
NOT APPLICABLE
Sec-Twp-Rng:
12-107-20
Lot-Block:
00-00
Deeded Acres:
0.0000
Tax Description
OUTLOT A NORTH COUNTRY ADDN #2

Valuation

Year	Land Value	Dwelling Value	Improvement Value	Total Value
2023	$5,000	$0	$0	$5,000
2022	$5,000	$0	$0	$5,000
More Years...				
2021	$4,700	$0	$0	$4,700
2020	$4,700	$0	$0	$4,700
2019	$4,700	$0	$0	$4,700
2018	$4,700	$0	$0	$4,700
2017	$4,700	$0	$0	$4,700
2016	$4,700	$0	$0	$4,700
2015	$4,700	$0	$0	$4,700
2014	$5,000	$0	$0	$5,000
2013	$1,000	$0	$0	$1,000
2012	$1,000	$0	$0	$1,000

2011	$15,000	$0	$0	$15,000
2010	$25,000	$0	$0	$25,000
2009	$26,400	$0	$0	$26,400
2008	$29,400	$0	$0	$29,400
2007	$32,600	$0	$0	$32,600
2006	$32,600	$0	$0	$32,600
2005	$32,600	$0	$0	$32,600
2004	$3,800	$0	$0	$3,800

Land Information

Lot Type	Square Feet	Acres
Lump Sum	82,498	1.890

Sale Information

Sale Date	Amount	Non-Useable Transaction Code	Recording
11/01/2018	$12,000	034 - SECONDARY PARCEL INCLUDED IN MULTIPLE PARCEL SALE TRANSACTION	1849

Sales Detail

Buyer:	CITY OF OWATONNA
Seller:	UNITED PRAIRIE BANK
Sale Date:	11/01/2018
Sale Amount:	$12,000
Sales Type:	LWD
NUT Code:	034 - SECONDARY PARCEL INCLUDED IN MULTIPLE PARCEL SALE TRANSACTION
Recording:	Tapestry Land Records
eCRV ID:	889740 eCRV Search
Additional Information:	Click Here

08/26/2015	$0	101 - TRANSACTION WITH NO CRV	1542

Sales Detail

Buyer:	UNITED PRAIRIE BANK
Seller:	JFJ DEVELOPMENT LLP ; C/O LYNN JOHNSON
Sale Date:	08/26/2015
Sale Amount:	$0
Sales Type:	WD
NUT Code:	101 - TRANSACTION WITH NO CRV
Recording:	Tapestry Land Records
eCRV ID:	N/A eCRV Search
Additional Information:	Click Here

Taxation

Payable Year	Classification / Homestead	Estimated Market Value	Taxable Market Value	Tax Capacity	Special Assessments	Total Tax
2021	EXEMPT PROPERTY	$4,700	$0	$0	$0.00	$0.00
2020	EXEMPT PROPERTY	$4,700	$0	$0	$0.00	$0.00
2019	RESIDENTIAL VACANT LAND	$4,700	$4,700	$59	$0.00	$100.00
2018	RESIDENTIAL VACANT LAND	$4,700	$4,700	$59	$0.00	$100.00
2017	RESIDENTIAL VACANT LAND	$4,700	$4,700	$59	$0.00	$100.00

Steele County Assessor

Assessor Hub provided by Vanguard Appraisals, Inc

Parcel Number:
17-594-0001
Deed Holder:
CITY OF OWATONNA
Property Address:

Mailing Address:
540 WEST HILLS CIRCLE
OWATONNA, MN 55060 USA
PDF Name:
EXEMPT PROPERTY
Class:
EXEMPT
Tax District:
0761
Zoning:
NOT APPLICABLE
Sec-Twp-Rng:
12-107-20
Lot-Block:
00-00
Deeded Acres:
0.0000
Tax Description
OUTLOT A NORTH COUNTRY ADDITION NO.3

Valuation

Year	Land Value	Dwelling Value	Improvement Value	Total Value
2023	$5,000	$0	$0	$5,000
2022	$5,000	$0	$0	$5,000

More Years...

Land Information

Lot Type	Square Feet	Acres
Lump Sum	103,362	2.370

Sale Information

Sale Date	Amount	Non-Useable Transaction Code	Recording
11/01/2018	$12,000	034 - SECONDARY PARCEL INCLUDED IN MULTIPLE PARCEL SALE TRANSACTION	1849

Sales Detail

Buyer:	CITY OF OWATONNA
Seller:	UNITED PRAIRIE BANK
Sale Date:	11/01/2018
Sale Amount:	$12,000
Sales Type:	LWD
NUT Code:	034 - SECONDARY PARCEL INCLUDED IN MULTIPLE PARCEL SALE TRANSACTION
Recording:	Tapestry Land Records
eCRV ID:	889740 eCRV Search
Additional Information:	Click Here

Sale Date	Amount	Non-Useable Transaction Code	Recording
08/26/2015	$0	101 - TRANSACTION WITH NO CRV	1542

Sales Detail

Buyer:	UNITED PRAIRIE BANK
Seller:	JFJ DEVELOPMENT LLP ; C/O LYNN JOHNSON
Sale Date:	08/26/2015
Sale Amount:	$0
Sales Type:	WD
NUT Code:	101 - TRANSACTION WITH NO CRV
Recording:	Tapestry Land Records

eCRV ID: N/A eCRV Search

Additional Information: Click Here

		Taxation				
Payable Year	Classification / Homestead	Estimated Market Value	Taxable Market Value	Tax Capacity	Special Assessments	Total Tax
2021	EXEMPT PROPERTY	$4,700	$0	$0	$0.00	$0.00
2020	EXEMPT PROPERTY	$4,700	$0	$0	$0.00	$0.00
2019	RESIDENTIAL VACANT LAND	$4,700	$4,700	$59	$0.00	$100.00
2018	RESIDENTIAL VACANT LAND	$4,700	$4,700	$59	$0.00	$100.00
2017	RESIDENTIAL VACANT LAND	$4,700	$4,700	$59	$0.00	$100.00

Exhibit K

City of Owatonna, MN

My Account | Owatonna East Side

Please call 507.444.4300 for assistance.

Description of the data requested:

We are requesting access to the following public data:

1. A copy of any City Council resolution adopted in or around 2004 related to the preservation, reservation, mapping, or protection of a corridor for the East Side Corridor or other future transportation infrastructure in East of Owatonna.
2. The City Council meeting minutes from the meeting at which this resolution was adopted, or discussed.
3. Any attachments presented to the City Council, staff memos, or correspondence in **connection with this resolution** or the mapped corridor prior to January 2020, if available.
4. Any follow-up documents or communications (from 2000 through 2020) that.
   - Refer to the preservation of the corridor,
   - Indicate a change in the City's position on the corridor,
   - Or mention the parcels within the mapped corridor.

You may provide a digital copy via email (preferred), or let us know if inspection or cost estimate is necessary.

If any records are no longer available, please cite the applicable retention schedule and reason they were destroyed or removed from public record.

City of Owatonna, MN

My Account | Owatonna East Side

Data Request
DATA-25-70

Your Submission
Attachments
Guests (0)

- City Administrative Review
- Administration Review
- Data Request Fee
- **Document Transmission**

Document Transmission Completed

Complete. This step was completed on Sep 3, 2025 at 3:47pm.

Tricia Notch Sep 3, 2025 at 3:47 pm

The Requested Data does not exist. If you have any questions, please contact Jeannette Clawson at 507-774-7341. The file is complete and closed.

Message the reviewer

Send Message

Comment #229

ESC EAW Comments #40

EAW Comment: Repeated Restart and Reclassification of Environmental Review Demonstrates Procedural Defects and Predetermination

The environmental review process for this project has been restarted and reclassified **at least three times**—first as a hybrid Environmental Assessment Worksheet (EAW), then as a programmatic review, and finally as a non-programmatic & EAW—**only after impacted residents raised formal concerns directly with state agencies**.

This repeated restarting and restructuring of the environmental review is not a neutral administrative adjustment. Rather, it reflects **fundamental procedural deficiencies, unresolved scope confusion, and a failure to correctly define the nature and impacts of the project from the outset**, as required under the Minnesota Environmental Policy Act (MEPA).

MEPA requires that environmental review:

- Be conducted **early in the planning process**;
- Accurately define the **entire project and its purpose**;
- Allow for **meaningful public participation**; and
- Avoid **segmentation, predetermination, or post-hoc justification of decisions already made**.

The fact that the Responsible Governmental Unit (RGU) repeatedly changed the type and structure of environmental review—**only after residents escalated concerns to the state**—demonstrates that:

1. The project scope and impacts were not adequately defined before review began;
2. The public was initially asked to comment on an **incomplete or improperly framed environmental document**; and
3. The review process has been reactive rather than compliant with MEPA's "early and informed" decision-making requirement.

These resets have materially harmed meaningful public participation. Each restart altered the assumptions, scope, and analytical framework residents were expected to respond to—**without resetting the timeline, correcting prior misinformation, or clearly disclosing why the earlier approaches were deficient**.

This pattern raises serious concerns about:

- **Predetermination of a preferred outcome**, followed by efforts to retrofit the environmental process;
- **Segmentation of environmental impacts**, particularly where the project's purpose, funding, scope creep and connected actions have shifted over time; and

- Whether a Finding of No Significant Impact (FONSI) could be legally supported when the environmental review framework itself has been repeatedly acknowledged—implicitly or explicitly—to be flawed.

Given the documented history of repeated environmental review restarts, reclassifications, and state-prompted corrections, the current EAW **cannot reasonably be relied upon** to support a FONSI. At minimum, this history supports the need for a **full independent Environmental Impact Statement (EIS)** to ensure a complete, transparent, and legally sufficient analysis of environmental, social, and cumulative impacts—conducted without predetermination and with genuine public participation.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #230

ESC EAW Comments #8

Failure of the RGU to Ensure an Accurate, Complete, and Informative EAW

This comment is submitted to address the Responsible Governmental Unit's failure to ensure that the Environmental Assessment Worksheet (EAW) is accurate, complete, and sufficiently informative to allow residents and decision-makers to understand the full scope of environmental impacts associated with the East Side Corridor project.

Under MEPA, an EAW must meaningfully disclose environmental impacts, mitigation measures, and alternatives in a manner that informs the public and supports reasoned decision-making. The EAW for this project fails to meet that standard.

1. Missing and Withheld Impact Information

The EAW omits or inadequately discloses critical information necessary to evaluate the project's impacts, including but not limited to:

- actual noise impacts and enforceable mitigation measures;
- floodplain impacts and associated supporting data;
- agricultural impacts beyond acreage taken, including income loss, drainage disruption, tiling damage, and property tax effects;
- cumulative impacts associated with scope creep and segmentation.

Where high level impacts are acknowledged, supporting analyses and underlying data are frequently absent or withheld from public preventing meaningful understanding of known direct impacts.

2. Misrepresentation of Noise Regulation Applicability

Despite documentation within the EAW indicating that the project constitutes a federal undertaking, the EAW asserts that the County is "exempt from noise regulations" and therefore not required to implement noise mitigation. This statement is misleading and inconsistent with federal and state environmental review standards.

Further, the "mitigations" described do not qualify as true mitigation and instead shift the burden onto impacted residents, exacerbating disproportionate harm rather than avoiding or minimizing impacts.

3. Federal Undertaking Contradictions and Withheld Documentation

The EAW includes correspondence indicating that, as of April 1, 2025, MnDOT's Central Region Unit (CRU) determined the project to be a federal undertaking due to scope expansion and segmentation. However, the EAW simultaneously minimizes or obscures the implications of that determination, and supporting documentation referenced in multiple letters is missing or stripped from the record.

These internal contradictions prevent the public from understanding the regulatory framework governing the project and undermine the credibility of the review.

4. Failure to Inform Residents and Dissemination of Inaccurate Information

Prior to December 11, 2025, the RGU had not spoken with East Side Corridor residents. At the December 11 open house, residents were provided with inaccurate and misleading information by the RGU, including statements that:

- noise studies were included in the EAW when they were not;
- avoidance remained an active option without acknowledging prior elimination of viable alternatives;
- the RGU was unaware of Alternative 3B;
- the RGU was unaware that portions of the proposed right-of-way are within approximately 17 feet of existing homes;
- the project's status as a federal undertaking was not disclosed;
- responsibility for reviewing and responding to public comments rested with the Board of Commissioners rather than the RGU.

These misstatements further deprived residents of meaningful participation and reflect a lack of familiarity with the contents and implications of the EAW.

5. Failure of the Purpose and Need

Current data underlying the project's purpose and need does not support the conclusions advanced in the EAW. When accurate and updated information is applied, the project's justification collapses, calling into question the necessity of the project itself.

6. Omission of Public Input, Cost, and Funding Information

The EAW further fails to inform the public and decision-makers by omitting or inadequately disclosing foundational contextual information, including:

- documented public comments and concerns raised during prior meetings and outreach;
- the full and evolving project cost, including escalation driven by mitigation requirements;
- funding sources, including the role of federal funds and the implications of federal involvement;
- financial tradeoffs, fiscal impacts, funding sources and amounts; and
- long-term public obligations associated with the project.

The absence of this information prevents meaningful evaluation of the project's scope, feasibility, and consequences. Public comments are not ancillary materials; they are essential to understanding community impacts and evaluating alternatives. Likewise, cost and funding are

inseparable from environmental decision-making, particularly where mitigation, scope expansion, and federal requirements materially affect both impacts and feasibility.

By excluding this information, the EAW presents an incomplete and misleading picture of the project and deprives residents of the ability to meaningfully assess whether the proposed action is justified or necessary.

Conclusion

Taken together, these deficiencies demonstrate a systemic failure by the RGU to ensure that the EAW fulfills its fundamental purpose: to inform the public and decision-makers of environmental impacts and reasonable alternatives. An EAW that omits critical information, contains internal contradictions, and misinforms residents cannot support a Finding of No Significant Impact.

For these reasons, preparation of a full independent Environmental Impact Statement is required.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment #231

ESC EAW Comments #38

Selective Roadway Relocation, Impact Redistribution, and Predetermination of Mitigation

Project layout materials demonstrate that a roadway segment adjacent to the partially developed Majestic Oaks residential development along 26th Street is planned to be removed or truncated, while the East Side Corridor (ESC) alignment is extended northward, to Kenyon Rd, to assume that traffic function. This design change does not eliminate traffic, noise, or safety impacts; rather, it reassigns and compounds them away from Majestic Oaks and onto existing residences and active farmland, placing the new proposed right-of-way just 17 feet from some homes.

The Environmental Assessment Worksheet (EAW) does not meaningfully analyze this redistribution of impacts, nor does it evaluate whether alternative alignments could avoid shifting environmental burdens from new development areas onto established neighborhoods and agricultural land. Environmental review requires not only identification of impacts, but an evaluation of **who bears those impacts and whether they were avoided or minimized at their source**.

Decision-Maker Statements Minimizing Compatibility and Mitigation

During an on-site interaction with affected residents on February 14, 2024, a sitting County Commissioner stated that, in practice, developers do not construct homes differently when building adjacent to major roadways. This statement is significant because it suggests that land-use compatibility measures—such as increased setbacks, buffering, or incorporation of noise mitigation at the development stage—were not expected or required, even when development occurs adjacent to high-volume traffic corridors.

In the same interaction, the Commissioner emphasized that mitigation must “make sense,” expressed a desire to avoid constructing noise walls, and repeatedly framed mitigation decisions in terms of cost and financial impacts to others. These statements are difficult to reconcile with the obligations of environmental review, which prioritize avoidance and minimization of impacts before cost-based elimination of mitigation is considered.

The Commissioner also stated that he opposed taking farmland or imposing unnecessary agricultural impacts. However, current project layouts show that the revised alignment re-bisects an existing 160-acre farm, removes an established farm access driveway, and requires construction of a substantially longer replacement driveway. This redesign increases conversion of prime farmland, disrupts agricultural operations, destroy substantial subsurface agricultural drainage (tiling) systems essential to the productivity, remove access to a large portion of farm fields, and imposes additional permanent impacts that were not present under previously mapped roadway configurations.

Once converted to roadway infrastructure, the affected land cannot be restored to its pre-construction prime farmland condition or classification. Road construction permanently alters soil structure through grading, compaction, fill placement, drainage disruption, and long-term

exposure to roadway pollutants, resulting in an irreversible loss of prime agricultural soil function even if the land were later returned to agricultural use. These impacts are magnified for farms bisected by multiple roadways and are inconsistent with prior Official's statements minimizing farmland impacts.

The EAW does not adequately disclose or analyze this increase in farmland impacts and cumulative compounded traffic impacts, nor does it evaluate whether alternative alignments could avoid re-bisecting productive agricultural land and associated farm infrastructure. For example, the existing 34th Avenue corridor already connects to Kenyon Road and would, at a minimum, avoid re-bisecting active farmland parcels and associated drainage and access systems. The failure to evaluate such avoidance-oriented alternatives further undermines the adequacy of the environmental review.

Conflict with Internal Project Documentation

Internal project correspondence dated April 25, 2024 confirms that noise mitigation for the North Country neighborhood was evaluated primarily to identify the minimum wall height that could be justified. The correspondence further shows that noise wall reconsideration was pursued for areas adjacent to the Majestic Oaks development following internal county meetings, while mitigation for the North Country neighborhood was evaluated in a manner focused on determining whether it could be excluded based on cost-effectiveness rather than on implementing protection for affected residents.

Together, these materials indicate that mitigation was not evaluated neutrally or comprehensively, but instead was constrained by alignment decisions and cost-effectiveness thresholds that limited mitigation obligations and resulted in differential treatment between development-adjacent areas and existing residential neighborhoods.

Predetermination and Appearance of Bias

Public confidence in the environmental review process depends on both technical adequacy and the reasonable perception that decisions are not pre-committed. When roadway impacts are relocated away from development areas, compatibility measures at the development stage are dismissed, and mitigation for existing residents is framed as financially impractical, the resulting pattern raises serious concerns regarding predetermination and selective burden shifting.

The development area from which the roadway segment is removed is associated with property interests of individuals who hold, or are closely connected to, positions of authority within local governing bodies participating in project decision-making.

Conclusion

The EAW fails to adequately disclose, analyze, or justify:

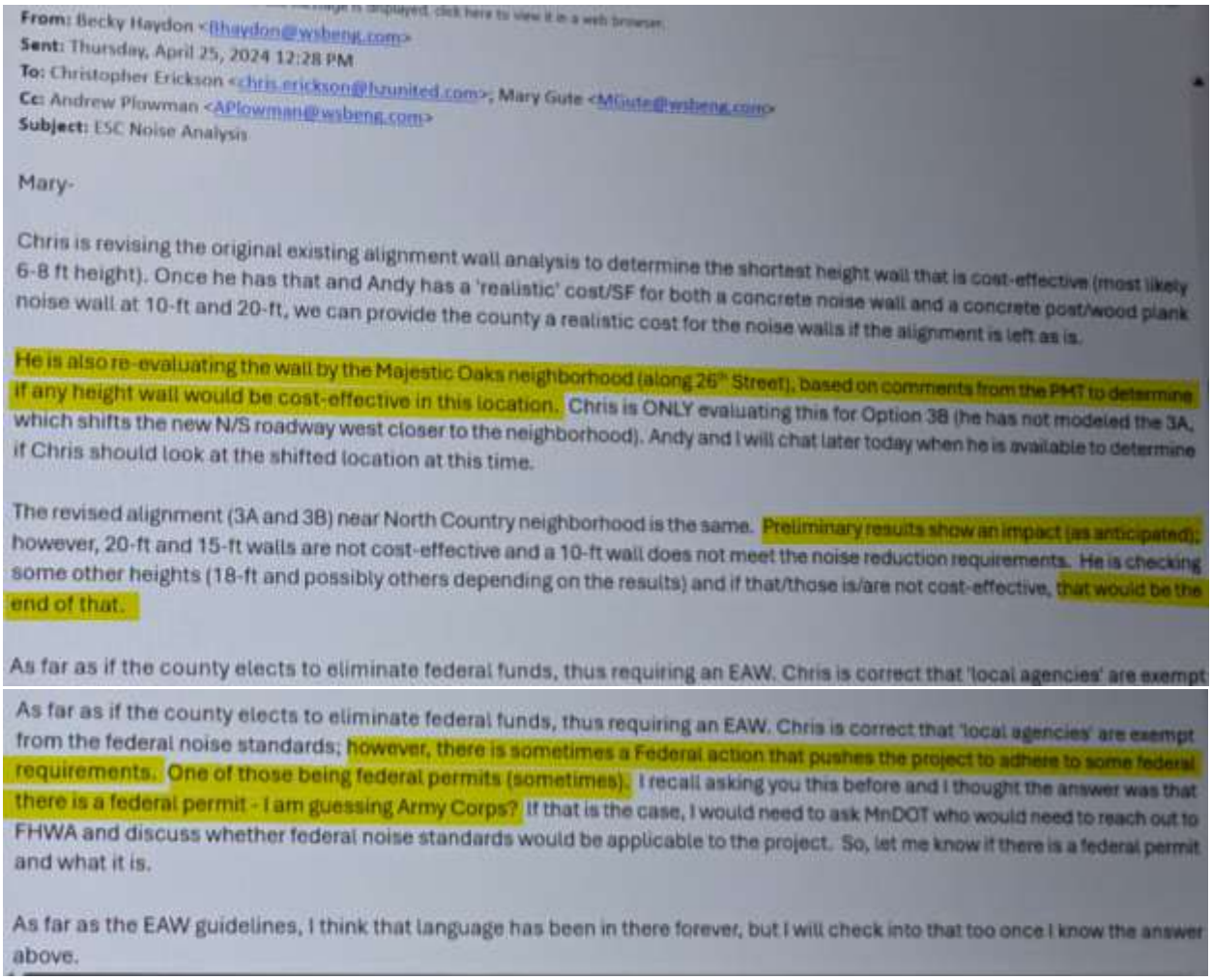
- The relocation of roadway impacts away from development areas;
- The resulting concentration of impacts on existing residences and farmland;
- The dismissal of development-stage compatibility measures; and
- The cost-driven elimination of mitigation for affected residents.

These deficiencies undermine the objectivity of the environmental review and warrant further environmental analysis under an independent Environmental Impact Statement.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Exhibit A — Project Layout Map Depicting Majestic Oaks Development and Removal of Adjacent Roadway Segment

Exhibit B — Internal Project Correspondence Regarding Noise Mitigation Evaluation and Noise Wall Considerations (April 25, 2024)



From: Becky Haydon <Bhaydon@wsbeng.com>
Sent: Thursday, April 25, 2024 12:28 PM
To: Christopher Erickson <chris.erickson@fuzunited.com>; Mary Gute <MGute@wsbeng.com>
Cc: Andrew Plowman <APlowman@wsbeng.com>
Subject: ESC Noise Analysis

Mary-

Chris is revising the original existing alignment wall analysis to determine the shortest height wall that is cost-effective (most likely 6-8 ft height). Once he has that and Andy has a 'realistic' cost/SF for both a concrete noise wall and a concrete post/wood plank noise wall at 10-ft and 20-ft, we can provide the county a realistic cost for the noise walls if the alignment is left as is.

He is also re-evaluating the wall by the Majestic Oaks neighborhood (along 26th Street), based on comments from the PMT to determine if any height wall would be cost-effective in this location. Chris is ONLY evaluating this for Option 3B (he has not modeled the 3A, which shifts the new N/S roadway west closer to the neighborhood). Andy and I will chat later today when he is available to determine if Chris should look at the shifted location at this time.

The revised alignment (3A and 3B) near North Country neighborhood is the same. Preliminary results show an impact (as anticipated), however, 20-ft and 15-ft walls are not cost-effective and a 10-ft wall does not meet the noise reduction requirements. He is checking some other heights (18-ft and possibly others depending on the results) and if that/those is/are not cost-effective, that would be the end of that.

As far as if the county elects to eliminate federal funds, thus requiring an EAW. Chris is correct that 'local agencies' are exempt from the federal noise standards; however, there is sometimes a Federal action that pushes the project to adhere to some federal requirements. One of those being federal permits (sometimes). I recall asking you this before and I thought the answer was that there is a federal permit - I am guessing Army Corps? If that is the case, I would need to ask MnDOT who would need to reach out to FHWA and discuss whether federal noise standards would be applicable to the project. So, let me know if there is a federal permit and what it is.

As far as the EAW guidelines, I think that language has been in there forever, but I will check into that too once I know the answer above.

Comment #232

ESC EAW Comments #19

Systemic Predetermination by Cooperating Governmental Units

This comment is submitted on behalf of the East Side Corridor (ESC) group, representing residents from across Owatonna who have participated in this process since its public inception in July 2022.

The EAW fails to comply with MEPA because the outcome has been predetermined through a series of actions by cooperating governmental units during the environmental review process.

- On May 13, 2025, a Township resolution committed support to a specific ESC alignment.
- On December 16, 2025, while the EAW comment period remained open, the City of Owatonna adopted a Resolution of Support committing to that same alignment, supporting right-of-way acquisition, and committing to cost sharing.

These resolutions are referenced in, or relied upon by, the EAW. They demonstrate that the range of reasonable alternatives was narrowed before environmental review was complete.

Predetermination under MEPA does not require a single decisive act. It is demonstrated through cumulative commitments that limit alternatives or render review outcome-driven rather than evaluative.

Improper Reliance on Mitigation Instead of Avoidance

The EAW improperly relies on mitigation to justify impacts rather than evaluating feasible avoidance alternatives. City officials stated on the record that final mitigation designs related to traffic and noise have already been completed, despite residents having no opportunity to review or comment.

Mitigation measures discussed do not meet MnDOT or FHWA requirements and are constrained by extremely limited right-of-way (as little as 17 feet from homes). Avoidance alternatives that would substantially reduce or eliminate these impacts were removed from public consideration and excluded from meaningful analysis in the EAW.

Failure of Purpose and Need

Statements made by City officials confirm that the ESC is intended to spur development rather than address a demonstrated transportation necessity. This undermines the stated purpose and need and confirms that development objectives have driven alignment selection.

Federal Undertaking and Environmental Justice

The ESC has been designated a federal undertaking, subjecting it to NEPA, Title VI, and federal environmental justice standards. Residents were not clearly informed of this status, and

impacts to a concentrated residential area — including at least 57 homes substantially impacted by noise — have been minimized and fragmented rather than analyzed cumulatively.

MEPA and NEPA do not allow disproportionate harm to be imposed on a small group of residents for the "greater good," particularly where feasible avoidance exists.

Required Remedy

Because predetermination has occurred, the current EAW cannot support a lawful FONSI. The environmental review is legally deficient and must be corrected through preparation of a full Environmental Impact Statement (EIS) or restart of the environmental review process in compliance with MEPA and NEPA.

Environmental review must inform decisions before commitments are made. That requirement has not been met.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

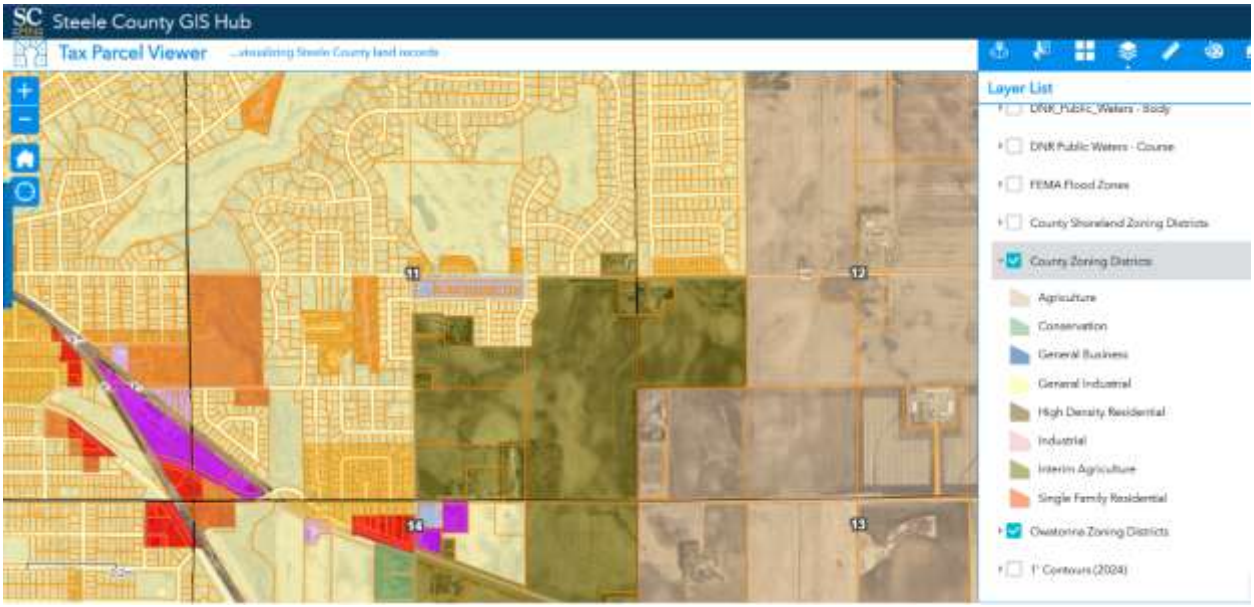
Comment #233

ESC EAW Comments #33

Group EAW Comment – Undisclosed Development Assumptions on Public Agricultural Land Labeled "Future Destination"

Submitted by: ESC Residents

The Environmental Assessment Worksheet (EAW) identifies a publicly owned school parcel as a "Future Destination" on page 337 but provides no explanation of what this designation means, what land use is anticipated, or how it relates to the East Side Corridor project. This omission is significant given the parcel's documented land use and valuation history.



Assessor records show that this parcel is zoned **Interim Agriculture**, located **outside city limits**, contains **no dwelling or improvements**, and remains in **active agricultural use**, including hay production under an FFA agreement. Despite this, the parcel's assessed land value reflects long-standing and renewed development expectations rather than agricultural use. This land was acquired around the year 2000 and was valued at approximately **$75,000 in 2003**. In 2004 the land valuation **jumped nearly $450,000** and was valued at **$524,000 continuously from 2004 through 2016**, later dropped to approximately **$247,000–$299,000** between 2017 and 2022, and then rose sharply again to **$443,200 in 2023** and **$481,800 in 2024–2025** without any corresponding zoning change, annexation, or physical development.

Year	Land Value	Dwelling Value	Improvement Value	Total Value
2025	$481,800	$0	$0	$481,800
2024	$481,800	$0	$0	$481,800
2023	$443,200	$0	$0	$443,200
2022	$298,700	$0	$0	$298,700
2021	$266,600	$0	$0	$266,600
2020	$260,200	$0	$0	$260,200
2019	$247,800	$0	$0	$247,800
2018	$247,800	$0	$0	$247,800
2017	$253,900	$0	$0	$253,900
2016	$275,300	$0	$0	$275,300
2016	$524,000	$0	$0	$524,000
2015	$524,000	$0	$0	$524,000
2014	$524,000	$0	$0	$524,000
2013	$524,000	$0	$0	$524,000
2012	$524,000	$0	$0	$524,000
2011	$524,000	$0	$0	$524,000
2010	$524,000	$0	$0	$524,000
2009	$524,000	$0	$0	$524,000
2008	$524,000	$0	$0	$524,000
2007	$524,000	$0	$0	$524,000
2006	$524,000	$0	$0	$524,000
2005	$524,000	$0	$0	$524,000
2004	$524,000	$0	$0	$524,000
2003	$74,900	$0	$0	$74,900
2002	$74,900	$0	$0	$74,900
2001	$68,600	$0	$0	$68,600

These valuation patterns are inconsistent with stable agricultural land and indicate embedded assumptions of future development. Those assumptions are further corroborated by the parcel's identification as a **"node" in the Imagine Owatonna comprehensive plan** and by elected officials calling the ESC **"project destination"** at the December 11, 2025 open house, yet the EAW does not disclose or analyze these planning expectations or their environmental consequences.

This omission is particularly concerning because the parcel identified as a "Future Destination" is publicly owned school property, giving taxpayers a direct interest in how public land is valued, designated, and potentially leveraged in connection with major infrastructure projects. Separately, the EAW references traffic generated by a different school property—the new high school—as part of the justification for the East Side Corridor. However, the EAW fails to

acknowledge or analyze that publicly owned school land elsewhere in the corridor is being treated in planning documents as a future development area. This disconnect obscures foreseeable development assumptions and prevents meaningful evaluation of induced growth and cumulative impacts.

By failing to explain the “Future Destination” designation or analyze the reasonably foreseeable development, induced growth, and cumulative land-use impacts associated with these long-standing planning and valuation signals, the EAW understates the environmental consequences of the project and prevents meaningful public review, contrary to the requirements of the Minnesota Environmental Policy Act (MEPA).

Because the EAW fails to disclose or analyze the long-standing and renewed development assumptions reflected in official valuation records and planning documents, it understates reasonably foreseeable development, induced growth, and cumulative land-use impacts associated with the East Side Corridor. An **Environmental Impact Statement (EIS) is therefore warranted** to fully evaluate these development pressures, their environmental consequences, and reasonable alternatives before irreversible commitments are made.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Steele County Assessor
Minnesota

Parcel Detail: 08-012-3400

Parcel Number:	08-012-3400
Deed Holder:	INDEPENDENT SCHOOL DIST #761
Property Address:	
Mailing Address:	515 W BRIDGE ST OWATONNA, MN 55060 USA
PDF:	Exempt Property
Class:	Exempt
Tax District:	0761
Zoning:	Not Applicable
Sec-Twp-Rng:	12-107-20
Lot-Block:	00-00
Deeded Acres:	35.3300
Tax Description:	NW1/4 OF SW1/4 EXCEPT COM NW COR TH E438'
Property Report:	Property Report (PDF file)

Applications & Exemptions

***Note:** If any changes are entered on the forms, the Assessor's office will call to confirm them before completing.

Valuation				
Year	**Land Value**	**Dwelling Value**	**Improvement Value**	**Total Value**
2025	$481,800	$0	$0	$481,800
2024	$481,800	$0	$0	$481,800
– More Years...				
2023	$443,200	$0	$0	$443,200
2022	$298,700	$0	$0	$298,700
2021	$266,600	$0	$0	$266,600
2020	$260,200	$0	$0	$260,200
2019	$247,800	$0	$0	$247,800
2018	$247,800	$0	$0	$247,800
2017	$253,900	$0	$0	$253,900
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2016	$524,000	$0	$0	$524,000
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2013	$524,000	$0	$0	$524,000
2012	$524,000	$0	$0	$524,000
2011	$524,000	$0	$0	$524,000
2010	$524,000	$0	$0	$524,000
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2004	$524,000	$0	$0	$524,000
2003	$74,900	$0	$0	$74,900
2002	$74,900	$0	$0	$74,900
2001	$68,600	$0	$0	$68,600

Agricultural Land Information	
Description	**Acres**
89 CER - Tillable 89	34.370
ROADS - ROADS	0.960

Sale Information

Sale Date	Amount	Sales Condition Codes	Recording
– 01/01/2001	$0	003ab - 3b-GOVERNMENT OR 3a-EXEMPT PARTY SALE	

Sales Detail

Buyer:	INDEPENDENT SCHOOL
Seller:	PARTRIDGE/JOSEPH
Sale Date:	01/01/2001
Sale Amount:	$0
Sale Type:	Deed
Sales Code:	003ab - 3b-GOVERNMENT OR 3a-EXEMPT PARTY SALE
Recording:	Tapestry Land Records
eCRV ID:	- eCRV Search
Additional Information:	Sale Information

Taxation

For further tax information and/or to pay your current taxes

Payable Year	Classification / Homestead	Estimated Market Value	Taxable Market Value	Tax Capacity	Special Assessments	Total Tax
2025	EXEMPT PROPERTY	$481,800	$0	$0	$22.40	$22.00
2024	EXEMPT PROPERTY	$443,200	$0	$0	$22.40	$22.00
– More Years...						
2023	EXEMPT PROPERTY	$298,700	$0	$0	$22.40	$22.00
2022	EXEMPT PROPERTY	$266,600	$0	$0	$22.40	$22.00
2021	EXEMPT PROPERTY	$260,200	$0	$0	$22.40	$22.00
2020	EXEMPT PROPERTY	$247,800	$0	$0	$22.40	$22.00
2019	EXEMPT PROPERTY	$247,800	$0	$0	$22.40	$22.00
2018	EXEMPT PROPERTY	$253,900	$0	$0	$22.40	$22.00
2017	EXEMPT PROPERTY	$275,300	$0	$0	$22.40	$22.00

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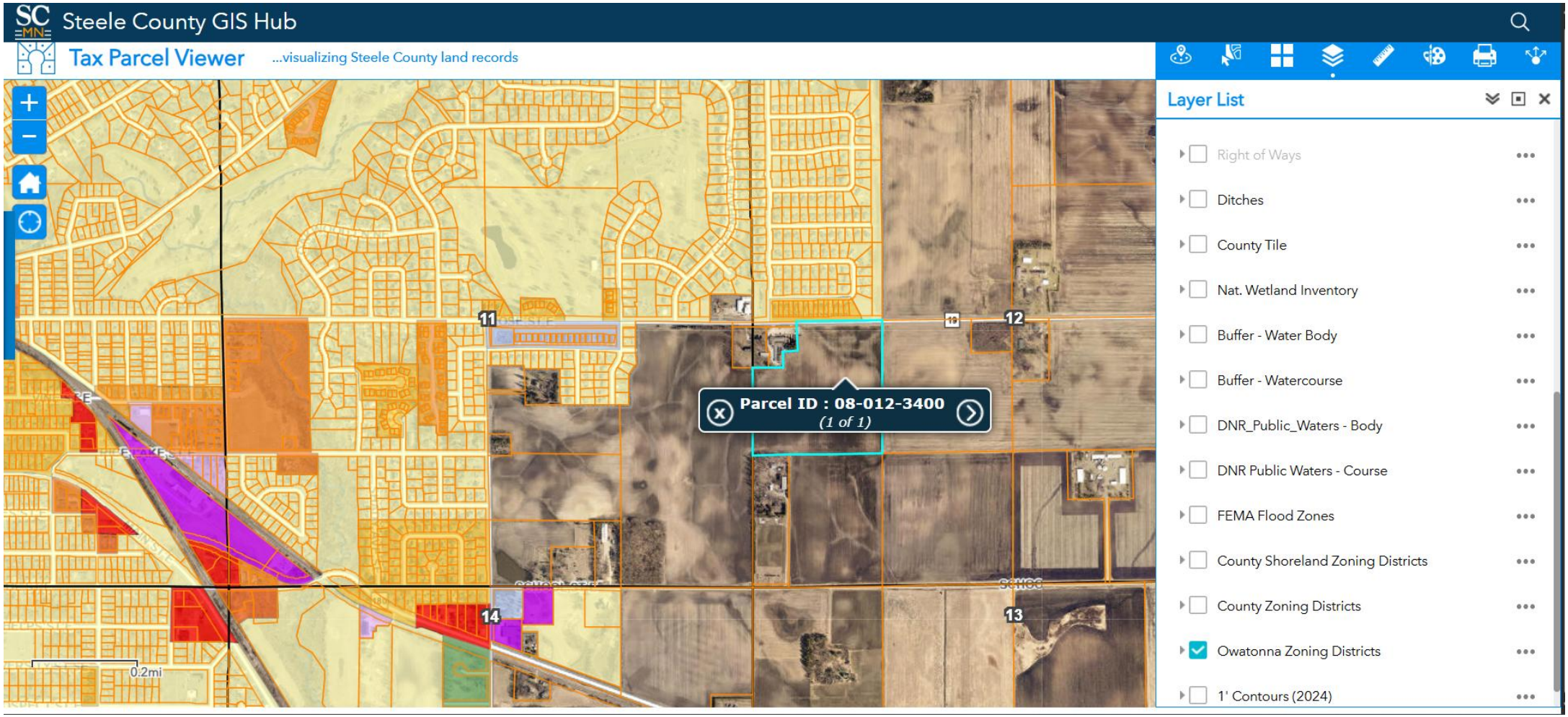
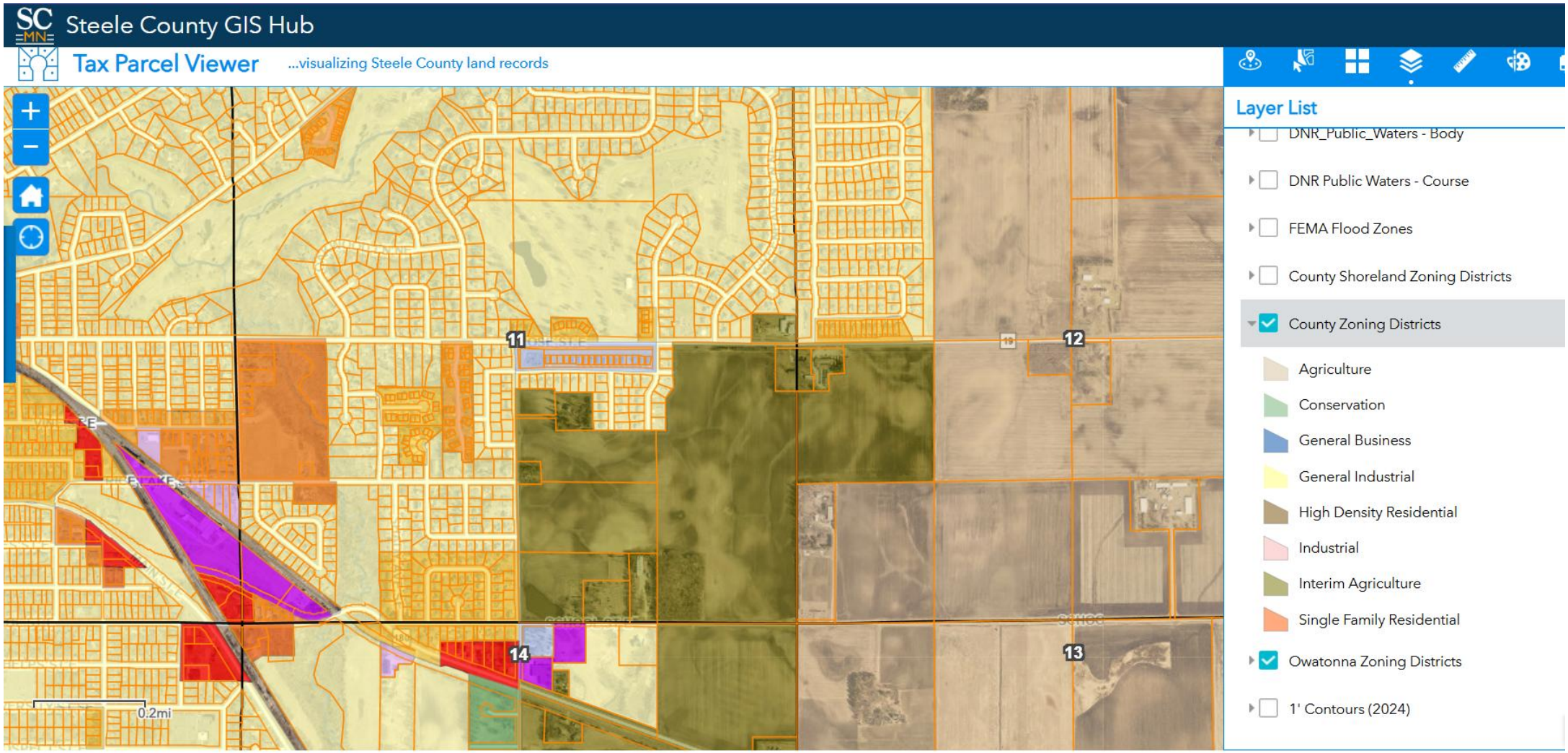

Steele County GIS Hub
Tax Parcel Viewer
...visualizing Steele County land records
Layer List
Right of Ways
Ditches
County Tile
Nat. Wetland Inventory
Buffer - Water Body
Buffer - Watercourse
DNR_Public_Waters - Body
DNR Public Waters - Course
FEMA Flood Zones
County Shoreland Zoning Districts
County Zoning Districts
Owatonna Zoning Districts
1' Contours (2024)
Parcel ID : 08-012-3400
(1 of 1)
11
12
13
14
0.2mi


Steele County GIS Hub
Tax Parcel Viewer
...visualizing Steele County land records
Layer List
DNR_Public_Waters - Body
DNR Public Waters - Course
FEMA Flood Zones
County Shoreland Zoning Districts
County Zoning Districts
Agriculture
Conservation
General Business
General Industrial
High Density Residential
Industrial
Interim Agriculture
Single Family Residential
Owatonna Zoning Districts
1' Contours (2024)
11
12
13
14
0.2mi

Comment #234

ESC EAW Comment #28

Segmentation of the East Side Corridor and Related Projects

Steele County, the City of Owatonna, and WSB repeatedly segmented interconnected projects into separate actions to avoid proper environmental review, minimize impacts on paper, and prevent residents from understanding the full scope of the development that would ultimately affect them.

- Multiple projects were planned and advanced as one system—but reviewed as isolated pieces.

  These include:

  - The ESC (new arterial highway)
  - The newly introduced 26th St. roundabout
  - 18th Street expansion
  - The 18th St. railroad roundabout (built 50' too close to the Railroad)
  - 18th St. Trails
  - The Owatonna High School relocation and construction
  - Utility expansion and substation upgrades planned through already-segmented corridors
  - ESC Trail Construction
  - Main St. Project
  - The Fire Station and Police Station
  - The Havana Project
  - CR 180 Railroad Crossing
  - 26th St Expansion
  - 26th St Mini Roundabout
  - 26th St. Roundabout
  - Adjacent housing and commercial development identified in Imagine Owatonna
  - Modern Aire Apartments

  Master plans and development studies:

  - Master Trails Plan
  - Master Downtown Streetscape
  - Imagine Owatonna

  Although these components form a single transportation and development system, they were deliberately separated into different processes so cumulative impacts would not be evaluated.

- Federal law prohibits segmenting connected actions to reduce apparent impacts.

  Under NEPA and MEPA, agencies must evaluate:

  - connected actions,
  - cumulative actions, and
  - similar actions **in a single environmental review.**

Here, instead of completing a unified analysis:

- ESC impacts were evaluated without considering the already-built roundabout directly connected to it and later coupled to the ESC project (needed to be in section 134 to continue-federal funding).
- 18th Street expansion (with federal funding) was treated as unrelated, even though it establishes the traffic network that "necessitates" the ESC.
- Noise, safety, and ROW impacts were artificially limited by excluding the segments built or planned immediately before and after the ESC.
- The ESC EAW ignores the 18th St project entirely even though **they operate as one continuous corridor in City/County planning documents.**
- Main St. Project that connects into the 18th St roundabout and received the ESC federal funds, carries downtown traffic and how the 2 impact each other.
- The ESC did not study the CR 180 Railroad under pass that "sets itself up nicely for a East Corridor" and what impacts that may have in connecting new roads
- What impacts the development taking place at the intersection of CR 180 and Main St that is "laying the groundwork for a dynamic, clean, and safe corridor. This transformation fosters connectivity from 26th Street to the new Owatonna High School and future developments that will continue to enhance the vibrancy of Owatonna" per a social media post.
- What impacts and benefits connecting trails all the way around Owatonna might have.
- The impact to downtown businesses.

- The 2020 Parks & Trails Plan, 18th Street expansion, ESC, the high school project, and the roundabout share the ***same sequencing and purpose***, yet were reviewed separately.

  When projects are viewed together, the sequence is clear:

  1. **OHS High School relocation** → increases traffic demands (**WSB**)
  2. **18th St expansion + roundabout** → provides southern ESC connectivity (**WSB**)
  3. **ESC** → becomes the northern continuation toward 26th St (**WSB**)
  4. **School-owned parcel identified as "future destination"** → requires ESC adjacency for utilities and access (**Undisclosed**)
  5. **Utility expansions** → planned along the ESC corridor and 18th St to benefit developments (**WSB/OPU**)
  6. **180th Railroad bridge** → Railroad bridge replacement over 180th St. (**WHKS**)
  7. **Havana intersection modification** → provides a connection from the ESC to Eastbound Hwy 14 (**WHKS** – but **WSB** mentions how it inter connects with the ESC in their RFP)
  8. **Main St.** → connect from the school to the center of town and was where ESC federal funds were transferred to (**SEH**)
  9. **Streetscape Master Downtown** → the master plan for downtown (**WSB**)
  10. **Fire/Police Station** → located on Main St. and downtown area (**IES**)
  11. **New 26th St Roundabout** → connects to the newly expanded 26th St. (**WSB**)
  12. **26th St. Expansion** → connects to the 2 roundabouts. (**Bolton & Menk**)
  13. **26th St. Mini Roundabout** → connector to the farther roundabout (**WSB**)
  14. **Parks and Trials Master Plan** → This connects all of the trails together around the perimeter of town including 18th St and ESC and determines the state trail tie-ins. (**WSB**)
  15. **Imagine Owatonna** → The roadmap to make them all work (**Stantec**)

These are not independent events — they are connected steps in a single regional development plan, and WSB holds a stake in most of them.

The EAW even calls the ESC a "Regional" plan and officials referred to the ESC as "Project Destination" at the project open house. If they're all connected the cumulative impacts need to be studied.

- The roundabout was built 50 feet too close to the railroad and coupled to the ESC project—yet was still excluded from ESC EAW.
    - Railroad required 200 ft separation
    - County built it with only 150 ft
    - Railroad refused responsibility
    - County refuses to accept responsibility
    - Federal grant existed to fix this issue but County declined to participate in the program and possibly was later declined (June 2025?)
    - The County Engineer began construction on the 18th Street/railroad intersection — the southern access point of the ESC — without securing the required federal railroad permits. (His own public statements in a commissioner meeting.)
      Despite its direct functional connection to the ESC corridor, this hazardous and non-compliant intersection was analyzed as if it were unrelated.
      Residents were told it was "a separate project," even though:
        - it is the primary southern access point for the ESC,
        - its design affects ESC traffic flow and safety,
        - it was "**coupled**" to the ESC, and
        - it will likely have to be torn out and rebuilt to meet federal and railroad standards likely in the middle of ESC construction.
    - It has not once been mentioned to residents that the 2 projects have become one, it was only learned through public data.
    - The western connection to the roundabout is 18th St., home to the New Owatonna High School. The very traffic the ESC supposedly needed to help elevate.
        - Since the school was built traffic has substantially decreased in concerning intersections.
    - The trails in the master trail outline the trails along both 18th and the ESC and how the connect to Kaplans trail and 26th St, making a full loop.
    - Utilities were already expanded under the roundabout to set up for the ESC as recorded in OPU meeting minutes.
        - OPU approve the purchase of land to expand the East Substation and ran utilities under the 18th St roundabout to prepare for the new corridor.

By excluding this intersection from cumulative ESC analysis, the County segmented impacts and withheld critical information about safety, cost, and design feasibility.

The County simultaneously argued that the ESC is needed to fix traffic to and from the new High School located on18th Street, while claiming the projects are unrelated for environmental purposes.

ESC EAW Comment #28

This is classic segmentation:

- Use one project to justify another
- But exclude them from each other's environmental analysis

If the ESC is needed *because of* the High School and subsequent expansion, they are legally "connected actions" and must be reviewed together. WSB further address the ESC traffic and it connection with the Havana project in the RFP they submitted to the Havana project.

Why an Environmental Impact Statement Is Required

This pattern of segmentation is precisely why Environmental Impact Statements exist. The East Side Corridor is not a standalone roadway project but part of a connected regional system of transportation, development, utility, and trail investments that have been advanced in sequence and reviewed separately. When these actions are viewed together, they present cumulative impacts that cannot be adequately evaluated through a project-level Environmental Assessment Worksheet.

The County has itself described the East Side Corridor as a regional project. Treating its component parts as independent actions obscures cumulative traffic, safety, noise, right-of-way, development, and equity impacts, and prevents meaningful evaluation of reasonable alternatives, including avoidance. MEPA requires that connected and cumulative actions be reviewed together before irreversible commitments are made.

For these reasons, a full, independent Environmental Impact Statement is required.

Owatonna East Side Corridor Resident
OwatonnaEastSideCorridor@gmail.com

Attached:
Map highlighting project impacts
Map connecting ESC and Havana Project

ESC EAW Comment #28

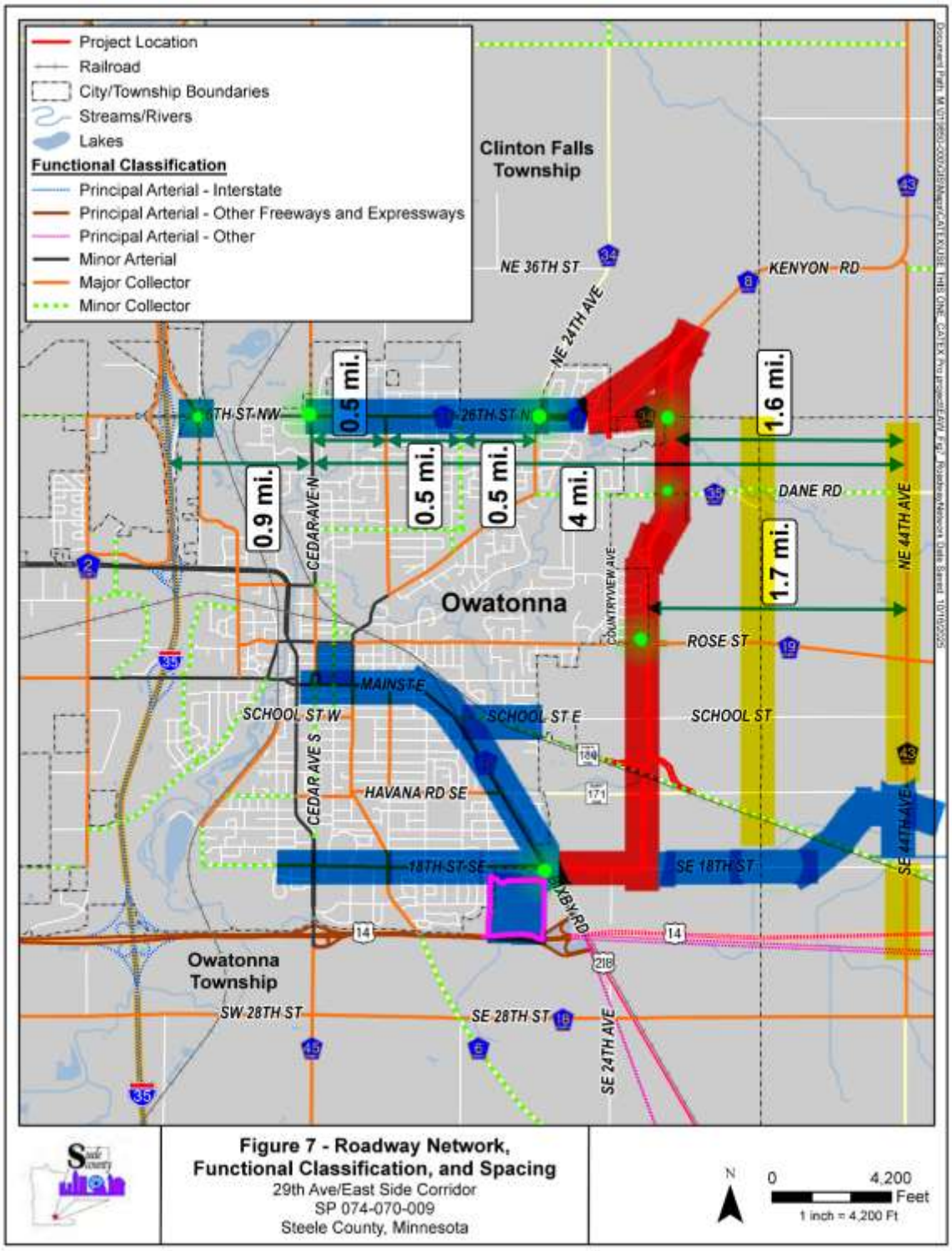


Figure 7 - Roadway Network, Functional Classification, and Spacing
29th Ave/East Side Corridor
SP 074-070-009
Steele County, Minnesota

Regional Transportation Project

- **Red**: ESC.
- **Blue**: current or recently completed connected projects.
- **Yellow**: newly introduced projects on the ESC website.

ESC EAW Comment #28

ESC connected to the Havana Project on a Steele County Project Map

Comment #235

ESC EAW Comment #23

Comment: Failure to Analyze Noise Wall Constitutes a Fundamental Defect in the VIA

The Visual Impact Assessment (VIA) fails to analyze the visual impacts of a **noise wall**, despite the project record demonstrating that noise mitigation was anticipated and actively under consideration prior to completion of the EAW.

Noise walls are not minor or speculative features. They are:

- Large, continuous vertical structures,
- **20 feet in height**,
- Reasonable, feasible and recommended in one or more locations along the ESC,
- Permanently alters viewsheds, neighborhood character, and landscape openness.

The VIA's omission of any analysis of a noise wall is particularly significant given that:

- A noise wall vote was prepared for consideration as early as **February 11, 2025**;
- The project alignment places the roadway in close proximity to existing homes;
- Noise mitigation is foreseeable based on traffic volumes, roadway design, and residential adjacency; and
- The EAW elsewhere acknowledges potential noise impacts requiring mitigation.

Under MEPA, a Visual Impact Assessment must evaluate **reasonably foreseeable project elements**, including mitigation measures that would materially alter visual character. A noise wall cannot be deferred or excluded from visual analysis simply because final design details are not complete.

By failing to evaluate:

- The **presence, height, length, and location** of a potential noise walls,
- Its **visual dominance relative to existing landforms and structures**, and
- Its **interaction with lighting, roadway elevation, and future development**,

the VIA presents an incomplete and misleading assessment of the project's visual impacts.

This omission is further underscored by the VIA's conclusion that the project would not benefit from more detailed visual analysis to reach community consensus. That conclusion is untenable when a major visual feature—one that has already been the subject of public discussion and anticipated mitigation—is not analyzed at all.

Because the visual impacts of a noise wall are foreseeable and potentially significant, the VIA's failure to address them deprives decision-makers and the public of a complete understanding of the project's true visual consequences. This defect cannot be cured through post-hoc explanation and supports the need for additional environmental review of an EIS.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

Comment # 236

ESC EAW Comment #20

Public Comment: Website Inaccuracies, Notice Failures, and Improper Project Representations

I. Scope of This Comment

This comment addresses **inaccuracies, omissions, and misleading representations contained on the official East Side Corridor project website**, and explains how those deficiencies undermine public notice, informed participation, and the integrity of the Environmental Assessment Worksheet (EAW) record. Because the project website functions as a primary public-facing source of information, errors and omissions on the site materially affect the public's ability to understand, evaluate, and comment on the project as required under the Minnesota Environmental Policy Act (MEPA).

II. Website Inaccuracies and Public Notice Failures

The project website contains multiple factual inaccuracies, omissions, and inconsistent statements that undermine lawful public notice and informed participation.

- Basic project information, including prior meeting dates and timelines, has been incorrect or internally inconsistent.
- The Environmental Assessment Worksheet (EAW) comment period was not properly noticed on the website, did not comply with Environmental Quality Board (EQB) posting requirements, and the required public meeting was omitted from the website entirely.
- Residents were not notified of the EAW until approximately **two weeks into the comment period**, and individuals who had explicitly requested written notification and updates did not receive copies of the EAW as required by Minn. R. 4410.1500(A)(13).
- The only submission option initially provided was a **1,000-character online text field**, which does not allow for meaningful participation, or physical mail, which creates cost and accessibility barriers. Email submission was only acknowledged as acceptable **by the EQB after intervention**, yet remains unlisted on the project website.

In addition, the website fails to disclose that the project was formally designated a **federal undertaking**, omits required Non-Programmatic Categorical Exclusion (CatEx) documentation, and does not provide access to technical studies cited and relied upon in the EAW. These omissions materially impair the public's ability to review the factual and legal basis of the project. The minimal studies that were available have been removed.

The project website was unavailable for an extended period (approximately **June 16–November 16, 2025**) after the domain was allowed to expire. Following delayed renewal, the website was not promptly restored, eliminating access during a critical period when the public reasonably relied on the website for accurate project status and participation information. This lapse occurred during a leadership transition in which the County was without a County Engineer for

nearly all of this period beginning **June 6, 2025**. The combined absence of (1) a functioning project website, (2) clearly identified engineering oversight, and (3) any consistent project communications or updates reasonably led residents to believe the project was no longer being actively advanced. Collectively, these failures demonstrate inadequate notice, incomplete disclosure, and unreliable public access to required information, undermining meaningful participation in the environmental review process as required under MEPA.

III. Introduction of New Project Conclusions Outside Any Public Process

The re-launched website introduces **new conclusions and scope assertions** regarding project need, growth assumptions, and long-term corridor planning that do not appear in prior engineering documents, adopted plans, or publicly reviewed materials.

These statements were published **after the departure of the County Engineer** and without reference to technical analysis, engineering review, or formal authorization by a governing body. The website presents declarative conclusions regarding the number of future north–south corridors, growth patterns, and infrastructure necessity without citation to adopted plans or engineering studies.

These statements appear to reflect **administrative interpretation rather than technical findings**, exceed the scope of administrative authority, and introduce new information that has not been subjected to environmental review or public process. Injecting new conclusions during an active environmental review undermines the integrity of the MEPA process and creates confusion regarding what has actually been studied, authorized, or decided.

IV. Unclear Technical Authority and Oversight

The project website and EAW were released during a period of staffing transition, including the departure of the County Engineer. The roles and authority for engineering oversight, technical authorship, consultant review, and decision-making are not clearly disclosed.

Public-facing materials contain definitive statements regarding project need and scope without identifying:

- who served as Engineer of Record,
- what consultant roles were authorized for this phase,
- what technical review occurred prior to publication, and
- what governing body approvals, if any, supported these representations.

Deciding major project conclusions during a period when the County lacked a clearly designated engineer, and relying on consultant work re-established administratively under master service

agreements rather than transparent, project-specific authorization, creates ambiguity regarding responsibility, accountability, and technical validity.

V. Misrepresentation of Growth Areas and Study Boundaries

The website states that the project area has been identified as a **"primary growth area."** This is misleading. The map shown is explicitly a **study area map**, not an adopted land-use, zoning, or comprehensive plan designation.

A study area is an analytical boundary, not a policy determination. Characterizing it as a growth area without citation to adopted plans improperly assumes future development that has not been formally approved. Using anticipated development within a study boundary to justify infrastructure creates a circular, outcome-driven rationale that undermines environmental review integrity.

VI. Misleading Traffic Justifications

The website references Owatonna High School as a traffic generator while omitting the school entirely from the study area map and failing to quantify its traffic impacts. Nearly all land uses generate traffic; invoking the high school without directional analysis, peak-hour data, or demonstrated network failure does not establish transportation need.

Similarly, claims regarding a lack of north–south connectivity rely on selectively defined study boundaries that exclude existing facilities, creating an artificial appearance of a network gap. Assertions regarding downtown congestion, neighborhood traffic diversion, and future roadway failures are speculative and unsupported by disclosed modeling or origin-destination analysis.

VII. Improper Expansion of Project Scope and Segmentation

The website asserts that the City and County have **"concluded the need for two or three north–south county road routes"** east of Owatonna, including both CSAH 43 and the East Side Corridor. This represents a material expansion of scope that has never been adopted through a formal planning process or evaluated under MEPA and limits viable alternatives prematurely eliminated.

Such conclusions have significant cumulative impact implications and cannot be evaluated through segmented, corridor-by-corridor review. Absent adopted plans and comprehensive analysis, these statements reflect impermissible predetermination.

VIII. Predetermination

The project website states: *"After reviewing decades of planning and studies, and considering recent changes in the area, the County and City determined that the 29th Avenue Corridor best balances existing and future traffic needs while minimizing impacts to houses and properties."* This statement reflects a **conclusive determination of corridor selection** and asserts that the balancing of impacts and needs has already occurred. Such conclusions necessarily presume the outcome of environmental review and demonstrate that key decisions were made **prior to completion of any environmental analysis and prior to meaningful public participation**, contrary to the purpose and requirements of MEPA.

Predetermination is further evidenced by a video titled *"Steele County East Side Corridor video,"* which was added to the project website on or about **December 11, 2025** and played at the public open house. The video states: *"A key element of the [Imagine Owatonna] plan was identifying 29th Avenue as the preferred location for the new north–south road on the east side of the City."* This language presents the selection of the 29th Avenue alignment as an established planning outcome rather than a subject of environmental evaluation or public input and occurred while ESC preferred alignment studies were occurring.

The website also states that *"The East Side Corridor project will continue to move forward without federal funds,"* and further explains that the **County Highway Capital Improvement Plan approved by the County Board has committed funds for construction of the entire corridor within the next five years**, with additional funding potentially provided by the City and the State. These representations demonstrate that the County has already committed to project implementation, including full construction, notwithstanding the ongoing environmental review process. Publicly committing capital funding, identifying construction timelines, and identifying substitute funding sources before environmental review is complete reflects an **irreversible and irretrievable commitment of resources**, reinforcing the appearance that environmental review is being used to justify a pre-selected outcome rather than to inform a decision.

Taken together, the website narrative, the publicly disseminated video, and the stated financial and construction commitments demonstrate that the 29th Avenue Corridor has been treated as the preferred and effectively chosen alignment **before environmental review was completed and before the public was provided a meaningful opportunity to comment on corridor selection**. Presenting alignment selection, funding commitments, and construction timelines as settled decisions undermines the objectivity of the EAW, constrains consideration of reasonable alternatives—including avoidance and non-build options—and violates the fundamental requirement that environmental review inform governmental decision-making rather than ratify decisions already made.

IX. Inaccurate Statements Regarding Existing Infrastructure

The website states that CSAH 43 is "still planned to ultimately connect directly to US 14." This is factually incorrect. CSAH 43 has connected directly to US 14 for decades. This error raises concerns about whether the website content—and, subsequently, the EAW—were reviewed for technical accuracy prior to publication.

X. Mischaracterization of the "Officially Mapped" Corridor

The project website overstates the legal and practical effect of the 2000 official map by claiming it preserved land, created rights of refusal, and appeared in title records. The public record demonstrates otherwise. The corridor was not preserved, rights of refusal were not exercised, and for decades the City approved annexations, subdivisions, and residential construction directly within the mapped alignment without objection or enforcement.

Further inquiry indicates that the map was never indexed to parcel identification numbers or otherwise carried forward in a manner that would cause the mapped corridor to appear in property title records. Moreover, the official map depicted only a **planning corridor** and did not establish right-of-way, easements, or any other legal preservation mechanism.

By omitting this history, the website presents a false baseline that materially misrepresents property rights, the status of the corridor, and the environmental context relied upon for project justification.

XI. Misleading Project History and Funding Narrative

The website frames the project as a new 2021 initiative and describes federal funding as supporting "partial construction" prior to environmental review. This obscures decades of prior abandonment, shifting alignments, and pre-selection of the 29th Avenue alignment through alignment-specific RFPs issued before public disclosure.

Environmental review is intended to inform decisions, not validate outcomes after funding, procurement, and alignment narrowing have already occurred.

XII. Misrepresentation of Federal Involvement and Regulatory Status

The website asserts that the project is no longer subject to federal environmental review because it is "not receiving Federal funding." This is inaccurate. On April 1, 2025, MnDOT

Cultural Resources formally determined the project to be a **federal undertaking**, triggering federal environmental obligations regardless of later funding reallocation. Additionally, the project utilized COVID-19 relief funds under the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA). These are federal funds that were used to partially fund the project.

By citing MnDOT environmental regulations while simultaneously asserting that NEPA no longer applies, the website presents an internally inconsistent and misleading regulatory narrative that undermines informed public understanding.

XIII. Mischaracterization of Public Engagement

The project website repeatedly conflates information sharing with meaningful public participation. Key decisions—including alignment narrowing and federal concurrence—were advanced before and without formal public comment opportunity on those decisions was provided. Internal work sessions and post-decision briefings are repeatedly portrayed as engagement, despite lacking opportunities for public input capable of influencing outcomes. During this period, residents repeatedly requested opportunities for dialogue and were told, “Later— it’s not time for conversation yet,” while decisions continued to advance.

This portrayal is contradicted by the documented record, including adjudicated findings that residents were unlawfully denied access to public data and subjected to hostile and intimidating conditions after exercising protected rights.

XIV. Use of Condemnation Language Prior to Environmental Review Completion

The website’s “Right of Way Process” graphic visually presents condemnation as an inevitable final step, despite the project remaining subject to environmental review and potential modification or denial. This framing is misleading, coercive, and risks chilling participation by signaling predetermination. Eminent domain or condemnation may not be a form of manipulating negotiations.

XV. Conclusion

Taken together, the project website contains **systemic inaccuracies, omissions, and misleading representations** that materially impair public notice, distort the environmental baseline, misstate regulatory status, and overstate public participation. Because the website functions as

a primary source of public information, these deficiencies directly undermine the adequacy and integrity of the EAW record and must be addressed as part of the environmental review.

Because the project website functions as the primary public-facing summary of the Environmental Assessment Worksheet, its pervasive inaccuracies, omissions, and introduction of unsupported conclusions materially undermine the reliability of the environmental record. When the document relied upon by the public to understand the project does not accurately reflect the EAW—or introduces information not subjected to environmental review—the integrity of the MEPA process is compromised. These inconsistencies create material uncertainty regarding the project's scope, impacts, regulatory status, and alternatives, and preclude informed decision-making. For these reasons, the deficiencies identified above support the need for preparation of an Environmental Impact Statement to ensure a complete, accurate, and transparent evaluation of the project and its reasonably foreseeable impacts.

Owatonna East Side Corridor Residents
owatonnaEastSideCorridor@gmail.com

Comment #237

ESC EAW Comments #17

Failure to Disclose Supporting Data for Rejection of 34th Avenue Alternative

This comment is submitted to document the absence of supporting documentation underlying the repeated assertion that 34th Avenue was “too far” and would not be used.

In January 2024, residents formally requested the supporting documents, tabletop exercise materials, and studies relied upon to justify the rejection of the 34th Avenue alternative, including any analyses or exercises that involved residents from the east side of town. See attached email. This request was made in response to statements by project representatives asserting that 34th Avenue would not be used, despite its inclusion in prior planning documents and right-of-way mapping.

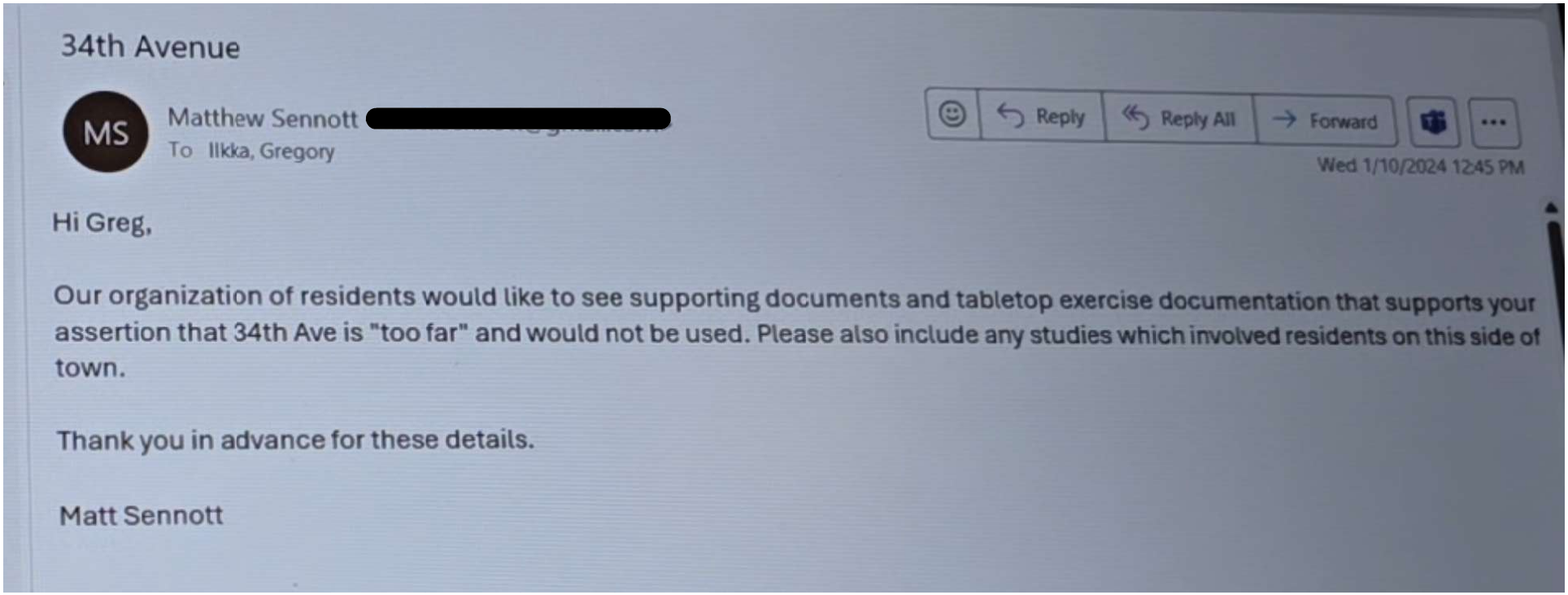
To date, no such documentation has been produced or disclosed to residents, nor has it been incorporated into the environmental record. The Environmental Assessment Worksheet similarly contains no underlying data, modeling, or resident-informed analysis supporting the elimination of 34th Avenue as a reasonable alternative.

MEPA and NEPA require early and continuous public participation in the evaluation of alternatives. This correspondence demonstrates that residents have been requesting supporting data regarding the rejection of the 34th Avenue alternative for multiple years, yet no documentation has been disclosed or incorporated into the environmental record. In October 2024, residents began formally documenting these requests, which resulted in a ruling against the County finding that data had been withheld, preventing meaningful public participation. The continued absence of response and supporting analysis reflects a failure to provide meaningful, ongoing public participation as required under MEPA and NEPA.

The absence of these materials—despite repeated requests over an extended period—demonstrates that the rejection of the 34th Avenue alternative is not supported by documented environmental or transportation analysis. This lack of disclosure prevents meaningful public review, undermines the credibility of the alternatives analysis, and supports the conclusion that the elimination of this alternative reflects predetermination rather than an evidence-based evaluation.

Because the environmental record does not contain the information necessary to understand or verify the basis for rejecting 34th Avenue, the EAW is incomplete and misleading. Preparation of an Environmental Impact Statement is required to ensure full disclosure, meaningful public participation, and lawful consideration of reasonable alternatives.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com



34th Avenue

MS

Matthew Sennott [redacted]

To Ilkka, Gregory

Reply | Reply All | Forward

Wed 1/10/2024 12:45 PM

Hi Greg,

Our organization of residents would like to see supporting documents and tabletop exercise documentation that supports your assertion that 34th Ave is "too far" and would not be used. Please also include any studies which involved residents on this side of town.

Thank you in advance for these details.

Matt Sennott

Comment #238

ESC EAW Comments #54

Development-Driven Purpose and Conflict with Public Input

The East Side Corridor (ESC) project appears to be driven primarily by anticipated development objectives rather than a demonstrated transportation need requested or supported by the public.

Multiple planning documents and records—including the Steele County 2040 Transportation Plan, the Imagine Owatonna Comprehensive Plan, internal correspondence, and the County's own public engagement materials—reflect a long-standing intent to facilitate future development east of the existing city rather than to address an existing or documented transportation deficiency. This includes repeated emphasis on growth enablement, increased developable land supply, and rising valuations of publicly held property, including school-owned parcels adjacent to the proposed corridor. Transportation infrastructure intended to induce or accommodate speculative development does not, by itself, establish a legitimate purpose and need under MEPA and must be clearly disclosed and analyzed as such.

Current public input further underscores this disconnect. Ongoing surveys and engagement tools show that residents have not requested a new corridor in the location advanced by the EAW. Instead, public input consistently reflects a preference for locating any east-side transportation improvements at or near 34th Avenue, where greater separation between roadways and development exists and where safety, noise, and livability impacts can be more effectively avoided.

Despite this, the City has remained adamant in advancing the corridor at its current location. The EAW does not meaningfully reconcile this position with public input, nor does it explain why avoidance-based alternatives that align with community preference—particularly those providing increased distance between roadways and residential or future development—were not advanced. Safety considerations, including adequate separation between transportation infrastructure and homes, schools, and future land uses, must precede economic or development interests.

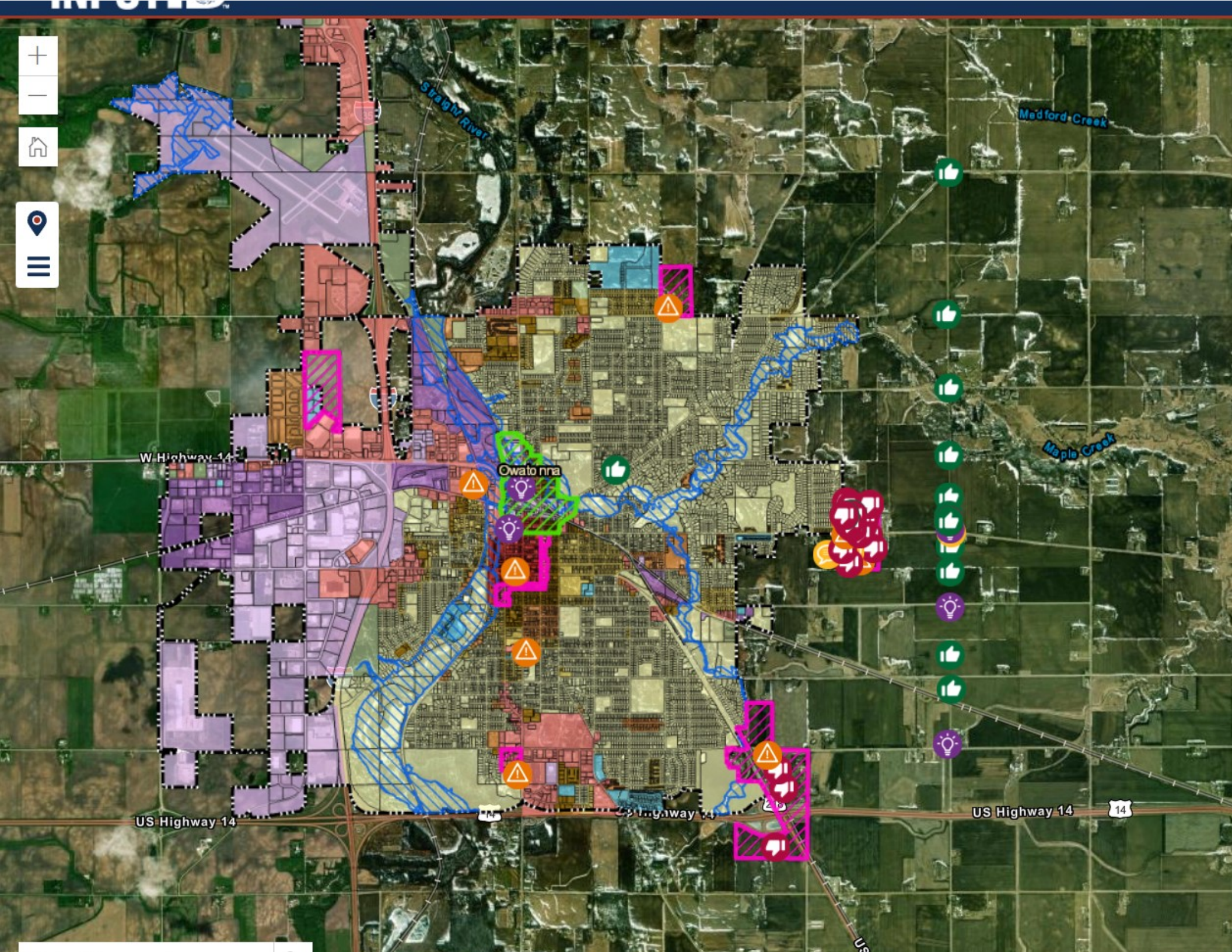
When a project's alignment and justification are shaped primarily by development goals rather than by an existing transportation problem identified by the public, the environmental review must explicitly acknowledge that fact and analyze the resulting environmental, social, and land-use consequences. The failure to do so obscures the true purpose of the project, undermines meaningful public participation, and compromises the integrity of the alternatives analysis.

What's worse is it appears to be a plan based on the idea that we got some free land and need to use it; land that when the development was completed should have been parceled and give back to adjacent land owners per the city's own ordinances (155.053). Sometimes it's cheaper to not use the free item and to uphold your duty to protect resident' health and safety.

Because the ESC project is being advanced in a manner that prioritizes development facilitation over demonstrated transportation need and public safety—and because public input favoring

avoidance-based alternatives has not been adequately addressed—the EAW does not provide a complete or objective basis for decision-making. These deficiencies warrant preparation of an Environmental Impact Statement (EIS) to fully evaluate purpose and need, alternatives consistent with public input, and the long-term implications of development-driven infrastructure decisions.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com


Straight River
Medford Creek
Maple Creek
W Highway 14
Owatonna
US Highway 14
US Highway 14
14

Steele County Assessor
Minnesota

Parcel Detail: 08-012-3400

Parcel Number:	08-012-3400
Deed Holder:	INDEPENDENT SCHOOL DIST #761
Property Address:	
Mailing Address:	515 W BRIDGE ST OWATONNA, MN 55060 USA
PDF:	Exempt Property
Class:	Exempt
Tax District:	0761
Zoning:	Not Applicable
Sec-Twp-Rng:	12-107-20
Lot-Block:	00-00
Deeded Acres:	35.3300
Tax Description:	NW1/4 OF SW1/4 EXCEPT COM NW COR TH E438'
Property Report:	Property Report (PDF file)

Applications & Exemptions

***Note:** If any changes are entered on the forms, the Assessor's office will call to confirm them before completing.

Valuation				
Year	**Land Value**	**Dwelling Value**	**Improvement Value**	**Total Value**
2025	$481,800	$0	$0	$481,800
2024	$481,800	$0	$0	$481,800
– More Years...				
2023	$443,200	$0	$0	$443,200
2022	$298,700	$0	$0	$298,700
2021	$266,600	$0	$0	$266,600
2020	$260,200	$0	$0	$260,200
2019	$247,800	$0	$0	$247,800
2018	$247,800	$0	$0	$247,800
2017	$253,900	$0	$0	$253,900
2016	$275,300	$0	$0	$275,300
2016	$524,000	$0	$0	$524,000
2015	$524,000	$0	$0	$524,000
2014	$524,000	$0	$0	$524,000
2013	$524,000	$0	$0	$524,000
2012	$524,000	$0	$0	$524,000
2011	$524,000	$0	$0	$524,000
2010	$524,000	$0	$0	$524,000
2009	$524,000	$0	$0	$524,000
2008	$524,000	$0	$0	$524,000
2007	$524,000	$0	$0	$524,000
2006	$524,000	$0	$0	$524,000
2005	$524,000	$0	$0	$524,000
2004	$524,000	$0	$0	$524,000
2003	$74,900	$0	$0	$74,900
2002	$74,900	$0	$0	$74,900
2001	$68,600	$0	$0	$68,600

Agricultural Land Information	
Description	**Acres**
89 CER - Tillable 89	34.370
ROADS - ROADS	0.960

Sale Information

Sale Date	Amount	Sales Condition Codes	Recording
– 01/01/2001	$0	003ab - 3b-GOVERNMENT OR 3a-EXEMPT PARTY SALE	

Sales Detail

Buyer:	INDEPENDENT SCHOOL
Seller:	PARTRIDGE/JOSEPH
Sale Date:	01/01/2001
Sale Amount:	$0
Sale Type:	Deed
Sales Code:	003ab - 3b-GOVERNMENT OR 3a-EXEMPT PARTY SALE
Recording:	Tapestry Land Records
eCRV ID:	- eCRV Search
Additional Information:	Sale Information

Taxation

For further tax information and/or to pay your current taxes

Payable Year	Classification / Homestead	Estimated Market Value	Taxable Market Value	Tax Capacity	Special Assessments	Total Tax
2025	EXEMPT PROPERTY	$481,800	$0	$0	$22.40	$22.00
2024	EXEMPT PROPERTY	$443,200	$0	$0	$22.40	$22.00
– More Years...						
2023	EXEMPT PROPERTY	$298,700	$0	$0	$22.40	$22.00
2022	EXEMPT PROPERTY	$266,600	$0	$0	$22.40	$22.00
2021	EXEMPT PROPERTY	$260,200	$0	$0	$22.40	$22.00
2020	EXEMPT PROPERTY	$247,800	$0	$0	$22.40	$22.00
2019	EXEMPT PROPERTY	$247,800	$0	$0	$22.40	$22.00
2018	EXEMPT PROPERTY	$253,900	$0	$0	$22.40	$22.00
2017	EXEMPT PROPERTY	$275,300	$0	$0	$22.40	$22.00

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Comment #239

ESC EAW Comments #56

Escalating Costs, Scope Creep, and Lack of Supporting Data

The East Side Corridor (ESC) project exhibits significant scope creep and cost escalation that is not supported by the underlying data or disclosed in a transparent, consistent manner in the Environmental Assessment Worksheet (EAW).

Early project communications and planning materials referenced construction estimates in the range of approximately $9–11 million. Subsequent capital improvement plans, internal correspondence, and project documents now reflect projected costs in the range of $30–35 million or more, with additional elements—including expanded intersections, roundabouts, grade-separation considerations, utilities, right-of-way acquisition, and future accommodation for development—added incrementally over time. At present, the total cost of the project remains uncertain.

Internal correspondence between County staff and consultants further demonstrates that the project's scope, cost assumptions, and design features were actively advanced and refined prior to completion of traffic analysis, safety evaluation, or environmental review. These communications show discussion of intersection control, roundabouts, bridge lengths, railroad treatments, urban cross-sections, right-of-way pricing, and cost "step-downs" for presentation purposes, even while acknowledging unknowns and speculative future development as primary drivers. This sequencing confirms that the project evolved from a preliminary roadway concept into a substantially larger and more complex undertaking before environmental impacts were disclosed or alternatives meaningfully evaluated.

This escalation has occurred despite the absence of verified traffic counts, documented safety deficiencies, or demonstrated operational need sufficient to justify many of the added design elements. Internal emails indicate that features such as intersection controls and roundabouts were discussed based on anticipated future development rather than existing conditions, and in some cases were explicitly framed as contingent on growth that "might" occur. Planning for speculative future traffic does not substitute for data-driven justification.

The EAW does not clearly identify which project elements are required to address current transportation needs versus those added to facilitate or anticipate development. Nor does it evaluate whether these incremental additions materially change the scope, cost, or environmental impacts of the project, aside from MnDOT CRU stating this scope creep was the reason for a federal undertaking, but the EAW does not address the additional impacts or project changes. As a result, the public is unable to meaningfully evaluate the true scale of the project, the financial commitments involved, or the tradeoffs being made.

MEPA requires that environmental review accurately disclose the full scope of a project and its reasonably foreseeable impacts. When a project evolves from a relatively limited roadway improvement into a substantially larger, more complex, and more costly infrastructure undertaking—without clear explanation, data support, or reassessment of alternatives—the environmental review becomes unreliable.

Because the ESC project has expanded dramatically in cost and scope without corresponding data to support those changes, and because the EAW does not adequately analyze or disclose the implications of this escalation, the EAW fails to provide a sound basis for decision-making. These circumstances warrant preparation of an Environmental Impact Statement (EIS) to fully evaluate project scope, cost drivers, alternatives, and long-term consequences before further commitments are made.

Owatonna East Side Corridor Residents
OwatonnaEastSideCorridor@gmail.com

RE: ESC Intersection control

SP

Sponholz, Paul
To Andrew Plowman

Reply | Reply All | Forward | ...

Tue 6/11/2024 9:55 AM

WSB

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From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Monday, June 10, 2024 11:11 AM
To: Andrew Plowman <APlowman@wsbeng.com>
Subject: ESC Intersection control

EXTERNAL EMAIL

Andrew,

Now that we have anticipated traffic counts on the ESC, have you looked at intersection control yet, or when would you start looking into that?

1. Do we see the ESC being the "main" route, with side stop control at all the intersections? Or would CSAH 19, 35, CR 180 be the "main" routes? With ESC being the "side"?
2. Any chance for all-way stops or roundabouts at CSAH 19 Rose St, CSAH 34 26th St, or CR 180? We'd need all-way stop warrant or ICE report.

Perhaps something to discuss at the PMT meeting tomorrow?

Just thinking ahead about dealing with NC. Intersection control at Rose St may have some influence on speeds, though I know we can't use intersection control just for speed.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

From: Sponholz, Paul <Paul.Sponholz@CO.STEELE.MN.US>
Sent: Friday, December 17, 2021 10:03 AM
To: Andrew Plowman <APlowman@wsbeng.com>
Subject: East Side Corridor

EXTERNAL EMAIL

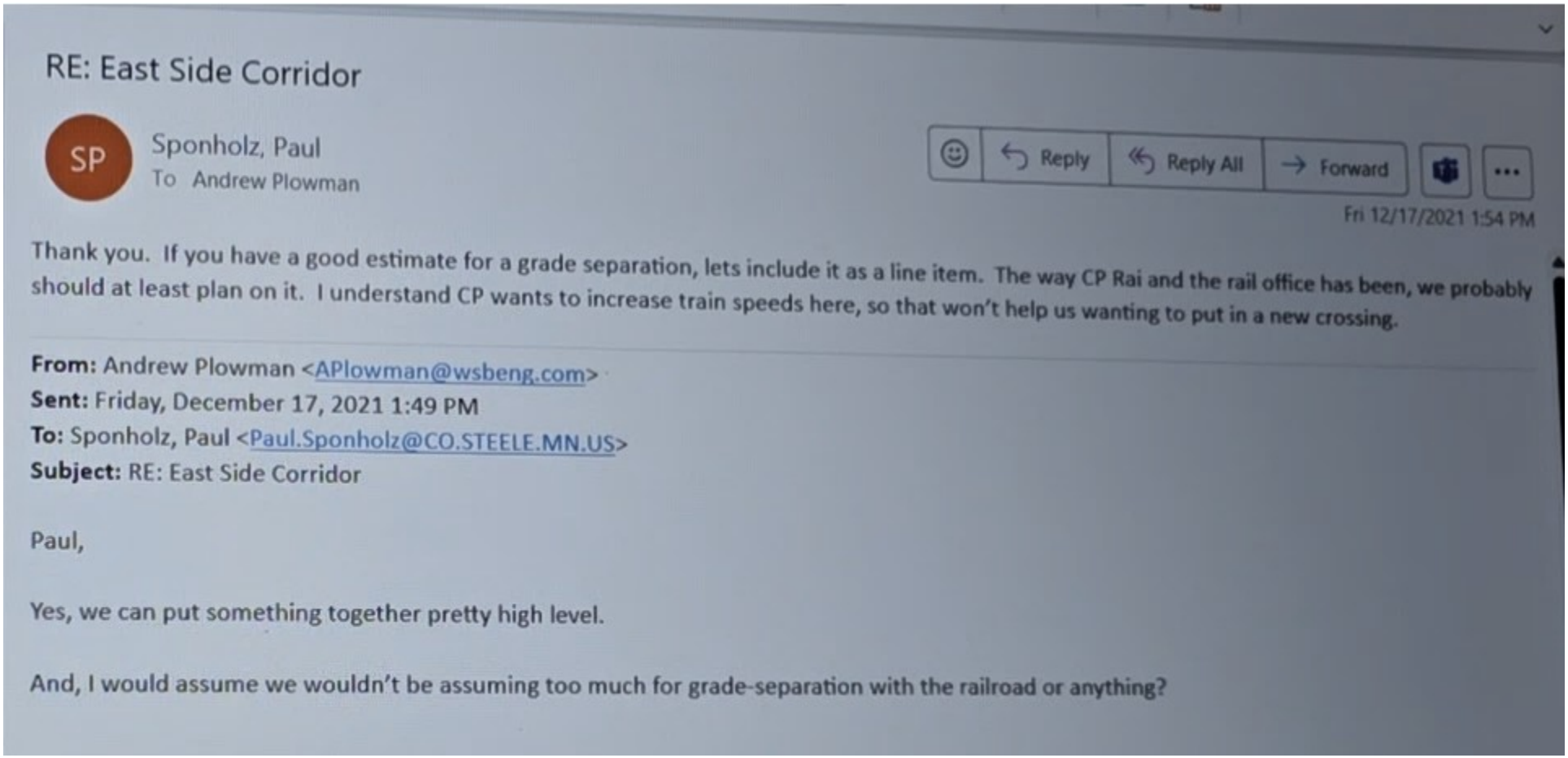
Andrew,

The solicitation is out for ATP-6 STIP funding. The deadline is February 1, so I'll be putting together the application soon. One request for you, can you come up with some sort of estimate for the project's construction or verify my high level estimate? And break it down in two parts, Bixby Rd to Dane Rd, and Dane Rd to CSAH 8 (including the 26th Street extension).

My current rough estimate is $11,500,000 for construction. Based it on $2 million/mile assuming most to be rural 2-lane roadway, a few turn lanes, and some small urban sections. So with the 4.2 miles for the main corridor and another 0.5 miles for the 26th Street extension, comes to about $9.5 million for the road, with another $2 million thrown in for bridges which is probably low if we need a railroad bridge.

I doubt we'll get to far into the study to get much better estimates, but anything you can help add to or verify mine, that would be helpful. Thank you.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 |M: (507) 475-2253 | paul.sponholz@co.steele.mn.us



RE: East Side Corridor

SP

Sponholz, Paul
To Andrew Plowman

Reply | Reply All | Forward

Fri 12/17/2021 1:54 PM

Thank you. If you have a good estimate for a grade separation, lets include it as a line item. The way CP Rai and the rail office has been, we probably should at least plan on it. I understand CP wants to increase train speeds here, so that won't help us wanting to put in a new crossing.

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Friday, December 17, 2021 1:49 PM
To: Sponholz, Paul <Paul.Sponholz@CO.STEELE.MN.US>
Subject: RE: East Side Corridor

Paul,

Yes, we can put something together pretty high level.

And, I would assume we wouldn't be assuming too much for grade-separation with the railroad or anything?

RE: ESC Intersection control

SP

Sponholz, Paul
To Andrew Plowman

Reply | Reply All | Forward | ...

Tue 6/11/2024 9:55 AM

Andrew,

Thank you. All good things to think about as we start moving forward.

Another one I forgot to mention, we've been eyeing up is the intersection of CSAH 8/CSAH 77/CSAH 34 (Kenyon Rd/24th Ave/26th Street) for a potential future roundabout. While we are there reconstructing that intersection, we should evaluate that one as well. The south leg is skewed, has some sight line issues. And probably higher counts than the rest of the new road.

Cost will be a factor to consider in all of them. Certainly in the middle of a reconstruction project, not a significant addition to the overall costs, but something to consider nonetheless.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2253 | Paul.Sponholz@SteeleCountyMN.gov

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From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Tuesday, June 11, 2024 9:46 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: RE: ESC Intersection control

I spoke with Jason about this. He won't be able to attend, but he did agree the roundabouts at strategic locations probably makes the most sense. We know a single lane will work great and it won't feel out of place as compared to others. Plus, we have the justification because it slows traffic, provides better pedestrian crossings and will handle traffic even if we get quite a bit of upcoming development.

Andrew Plowman, PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
-
701 Xenia Avenue S. Suite 300

RE: ESC Intersection control

SP

Sponholz, Paul
To Andrew Plowman

Reply | Reply All | Forward | ...

Tue 6/11/2024 9:55 AM

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From: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Sent: Monday, June 10, 2024 12:12 PM
To: Andrew Plowman <APlowman@wsbeng.com>
Subject: RE: ESC Intersection control

EXTERNAL EMAIL

I figured it wouldn't be easy and probably not enough traffic yet. Part of me is hoping for a good reason or warrant to put roundabouts at CSAH 34 (26th Street) and at CSAH 19 (Rose St), the two highest counts, and most likely chance of needing one in the future if development continues. But then it's a lot cheaper not to have to build them yet. If we don't build with the project, I think we should plan on acquiring enough right of way with the project to accommodate them in the future.

From: Andrew Plowman <APlowman@wsbeng.com>
Sent: Monday, June 10, 2024 12:03 PM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>
Subject: RE: ESC Intersection control

I will talk to Jason and see how we are going to figure that. It is relatively tricky, because we don't truly know what the traffic is, especially the peak hour turning movements. I don't think anything will trigger from a pure traffic perspective, but if we are looking at traffic calming and/or pedestrian movements, that is where a roundabout would be figured. But, otherwise I see that East Side corridor is the primary with the other is side street stopped controlled.

Andrew Plowman, PE
Director of Transportation Design - Minnesota
612.360.1311 (o)
701 Xenia Avenue S, Suite 300

You replied to this message on 5/13/2024 10:55 AM.

Alts_Evaulation_Matrix_05-11-2024.xlsx
3 MB

Thank for the current matrix to start looking at it. I'll be available throughout the weekend, so can review as you get more done. Just a quick review so far and some quick comments:

1. For Alts 4 & 5, is the grey area because it doesn't meet the purpose and need and won't be further evaluated, correct?
2. I'm a bit nervous over the cost estimates. Currently I had construction/rw/utility/railroad costs estimated at $18.3 million. Your estimate is coming in at $35 million. Ouch. I'm probably not accounting for current construction inflation. Yeah, keep in mind this has quite a bit of contingency, we are actually using 30%, because there are a lot of unknowns. So, it is probably closer to $25M. Not that makes it much better, but that $35M is probably not really that realistic, so we can step it down to if you want to ensure the commissioners and councilors don't get too hung up on that number. Yes, lets step it down a bit. Agreed, $25M is probably more realistic once I adjust my numbers for inflation and have some contingency. Really, we are trying just to compare the alternatives. True, it is a high level estimate. We can say its pretty conservative with the contingency.
    a. I see you are using a $3.6 million/mile cost estimate for the road. I suppose that gets into rural vs urban cross sections, and we'll have a mix yet to be determined. I estimate that all of 26th Street will be urban, Rose to 26th mostly urban, and most the rest as rural. What numbers are you seeing for rural only and for urban only these days? I've been going with about $2 million/mile for rural and a simple urban project about $4 million/mile. I think I assumed trail costs in that. In 2019 we reconstructed a rural road at $1.2 million/mile. Yes, we assumed it would all be urban (again to be conservative) and curb and gutter with trail the whole way. So, I am good stepping it down a bit and using the 2M for a good chunk of it. We included ponding and all of that too. So, maybe I will run some numbers assuming some rural. Id be ok with assuming more on the urban, then its easier to trim down in final design with decisions to go more rural. That will need more discussions with the city on how much we want to urbanize.
    b. How long of a bridge do you anticipate needing? Both upstream and downstream of the crossing, both on Dane Rd, the bridges are about 80 feet in length. I assumed 150 feet long at 36 feet wide, using $220/sqft, I get about 1.2 million for the bridge. Or are you adding in some significant fill we'd need? I suppose I'll need something for the trail crossing as well, another 10-12 feet in width. Even at 150' long x 48' wide is about $1.6 million. OK, we were quite a bit more on that. We assumed $4M, but based on our estimators numbers

Disconnected

You replied to this message on 5/13/2024 10:55 AM.

Alts_Evaulation_Matrix_05-11-2024.xlsx
3 MB

will need more discussions with the city on how much we want to urbanize.

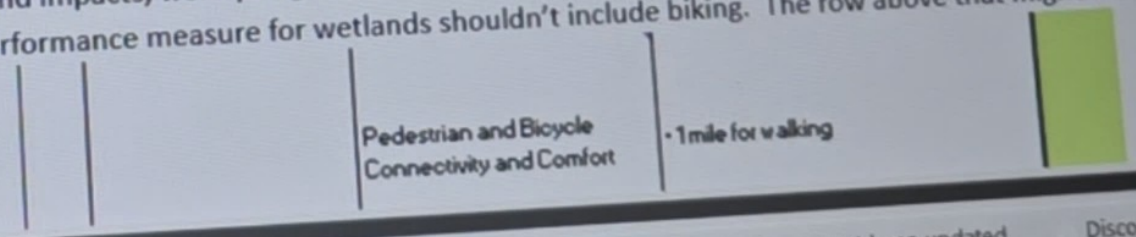
b. How long of a bridge do you anticipate needing? Both upstream and downstream of the crossing, both on Dane Rd, the bridges are about 80 feet in length. I assumed 150 feet long at 36 feet wide, using $220/sqft, I get about 1.2 million for the bridge. Or are you adding in some significant fill we'd need? I suppose I'll need something for the trail crossing as well, another 10-12 feet in width. Even at 150' long x 48' wide is about $1.6 million. OK, we were quite a bit more on that. We assumed $4M, but based on our estimators numbers it should be closer to $3M. They assumed 8600 SF @ $325/SF. We assumed 180' long, which may be a bit long, but knowing we need to get out of any floodplain. Probably more of the final design decisions, so I suppose pays to be on the high side. Again, we can explain its conservative

c. For r/w costs, you are using $3/sqft or $130,680/acre. Farmland is going for about $10-15 thousand (maybe 20) per acre around here. Maybe closer to the city limits that may be future residential, we recently paid about $25,000/acre. Costco Distribution Center recently purchased farmland at $30,000/acre for a large complex now annexed into the city, and everyone thought that was crazy high. And that was maybe 3-5 years ago. That is a good value to go with. For some reason, I thought Dixon's payment was about $3/SF, but maybe I was off a bit. I think I would keep options 1 and 2 up a little higher as some of that would be for residential cost. But, options 3 could come down to about $0.50/SF. Yes, Dixons payment was about that $3/sf range, similar to what the city was seeing for property in the city limits. So for the Alternatives 1 & 2, that would be appropriate. Pichner was the $25k/acre, more in line with farmland ready for development, so maybe $30k is good for the 3 alignments.

d. Rail crossing is $750,000 for what we are paying at the roundabout project. We used $500,000, thinking they may not hammer us as much, but I will use the $750k as it matches what we saw on the one so close by.

3. Farmland impacts, were you going to add total impacts, not just the drained and prime?

4. The performance measure for wetlands shouldn't include biking. The row above that might not be correct either.



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Alts_Evaulation_Matrix_05-11-2024.xlsx
3 MB

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4. The performance measure for wetlands shouldn't include biking. The row above that might not be correct either.

		Pedestrian and Bicycle Connectivity and Comfort	• 1 mile for walking	
	Wetlands	Potential impacts to resource	• 3 miles for biking	
			• Number of parcels and acres of business/residential properties potentially directly impacted (i.e., land required for the project either	P. I 1

Paul Sponholz, P.E. | Assistant County Engineer
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890
O: (507) 444-7672 | M: (507) 475-2252 | Paul.Sponholz@SteeleCountyMN.gov

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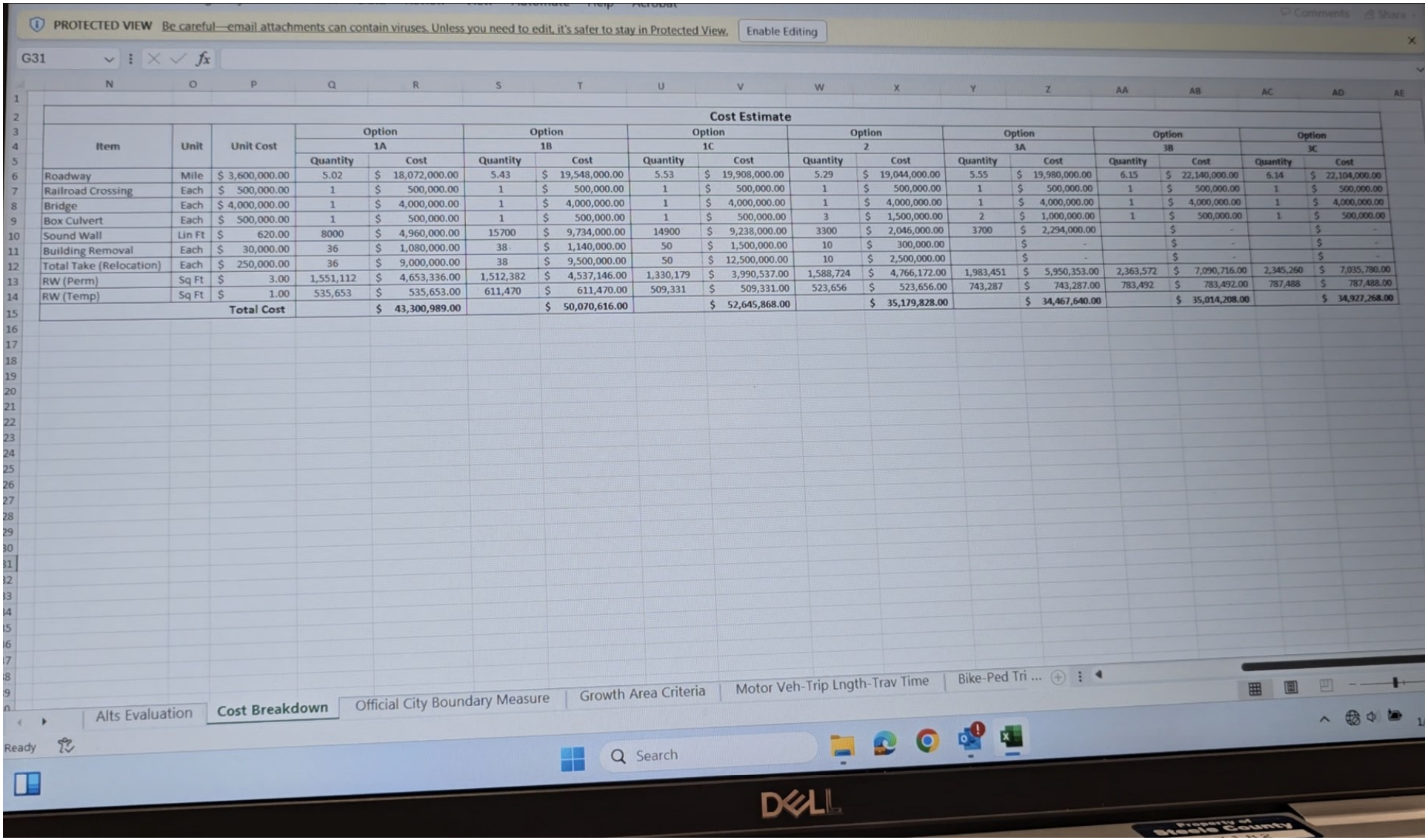


Cost Estimate

Item	Unit	Unit Cost	Option 1A		Option 1B		Option 1C		Option 2		Option 3A		Option 3B		Option 3C	
			Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost	Quantity	Cost
Roadway	Mile	$ 3,600,000.00	5.02	$ 18,072,000.00	5.43	$ 19,548,000.00	5.53	$ 19,908,000.00	5.29	$ 19,044,000.00	5.55	$ 19,980,000.00	6.15	$ 22,140,000.00	6.14	$ 22,104,000.00
Railroad Crossing	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00
Bridge	Each	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00	1	$ 4,000,000.00
Box Culvert	Each	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	1	$ 500,000.00	3	$ 1,500,000.00	2	$ 1,000,000.00	1	$ 500,000.00	1	$ 500,000.00
Sound Wall	Lin Ft	$ 620.00	8000	$ 4,960,000.00	15700	$ 9,734,000.00	14900	$ 9,238,000.00	3300	$ 2,046,000.00	3700	$ 2,294,000.00		$ -		$ -
Building Removal	Each	$ 30,000.00	36	$ 1,080,000.00	38	$ 1,140,000.00	50	$ 1,500,000.00	10	$ 300,000.00		$ -		$ -		$ -
Total Take (Relocation)	Each	$ 250,000.00	36	$ 9,000,000.00	38	$ 9,500,000.00	50	$ 12,500,000.00	10	$ 2,500,000.00		$ -		$ -		$ -
RW (Perm)	Sq Ft	$ 3.00	1,551,112	$ 4,653,336.00	1,512,382	$ 4,537,146.00	1,330,179	$ 3,990,537.00	1,588,724	$ 4,766,172.00	1,983,451	$ 5,950,353.00	2,363,572	$ 7,090,716.00	2,345,260	$ 7,035,780.00
RW (Temp)	Sq Ft	$ 1.00	535,653	$ 535,653.00	611,470	$ 611,470.00	509,331	$ 509,331.00	523,656	$ 523,656.00	743,287	$ 743,287.00	783,492	$ 783,492.00	787,488	$ 787,488.00
		Total Cost		**$ 43,300,989.00**		**$ 50,070,616.00**		**$ 52,645,868.00**		**$ 35,179,828.00**		**$ 34,467,640.00**		**$ 35,014,208.00**		**$ 34,927,268.00**

Sean,

We've had a meeting with Dale Gade (State Aid) and FHWA (Bill Luhr and regarding the ESC a couple of days ago, then with WSB this morning. You can call me sometime and I can fill you in on details, but bottom line Zimmerman has scared the FHWA, so they want us to do a Non Programmatic CatEx now, instead of the Programmatic Cat Ex.

Fortunately not a significant amount of extra work for WSB. The EAW and NCE documents are nearly identical. FHWA/State Aid are good with us doing the work for both documents concurrently. But the big difference now is we need to get concurrence from the FHWA on Purpose & Need, Evaluation Criteria, and Preferred Alternative selection. So probably a lot more time for that review and delays to the project in getting the environmental documents completed.

Good thing is WSB has much of the work done already for the concurrence points. If you would, please review the attached purpose & needs and provide any feed back ASAP so we can get this moving. The Evaluation Criteria should be coming soon too in another email. WSB has a bit more to do on the Alternative selection, but will get that moving. We had presented a very limited view of the alternative selection during the last open house, but WSB will need to add significantly more details on any viable alternatives.

The other good thing, we don't have to do any additional public open houses other than the 3rd and last one we have planned near the end of this process. FHWA/State Aid was good with the effort we did in the first two. I'm trying to clarify, I think a Public Hearing is needed for the EAW, but not the CATEX. Dale good with doing the public hearing with the next open house.

Paul Sponholz, P.E. | **Assistant County Engineer**
Steele County | PO Box 890, 3000 Hoffman Dr NW, Owatonna, MN 55060-0890

Construction Year: 2024

East Side Corridor (29th Ave)

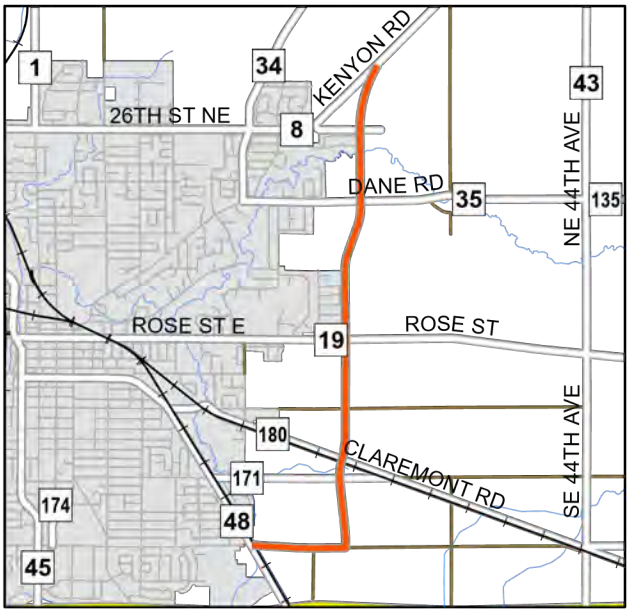
City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21



Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NW). The project could be built in stages over a couple of years.

Project Justification

Traffic has no direct route to traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part of CSAH 43 to the east. While CSAH 43 will have connections to US 14 and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street NW.

Funding Source	Prev. Years	2022	2023	2024	2025	2026	Fut. Years	Total
Bridge Funding - Fund 29						500,000		500,000
Federal Funds		200,000		2,000,000	2,000,000			4,200,000
Other Local				500,000	500,000	750,000		1,750,000
Sales Tax Revenue			1,350,000		300,000			1,650,000
State Aid				1,500,000	1,500,000	2,250,000		5,250,000
Total		200,000	1,350,000	4,000,000	4,300,000	3,500,000		$13,350,000

Expenditure Type	Prev. Years	2022	2023	2024	2025	2026	Fut. Years	Total
Construction				4,000,000	4,000,000	3,500,000		11,500,000
Design Engineering			600,000		300,000			900,000
Preliminary Engineering		200,000						200,000
Right of Way			650,000					650,000
Utility			100,000					100,000
Total		200,000	1,350,000	4,000,000	4,300,000	3,500,000		$13,350,000

Construction Year: 2025

East Side Corridor

City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

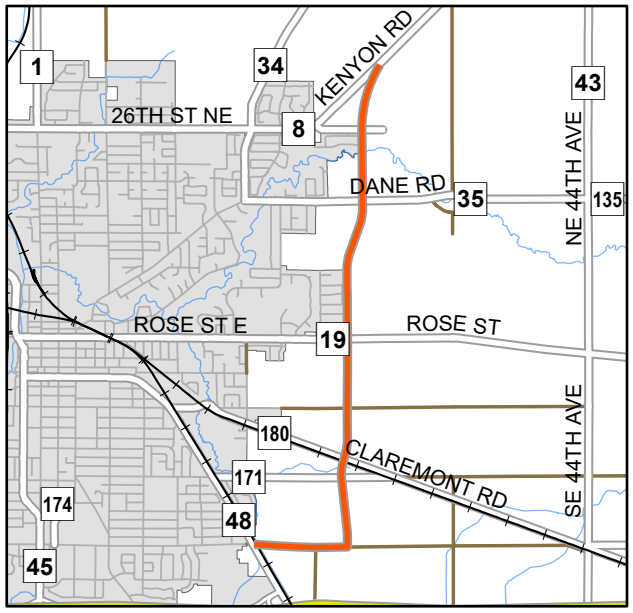
Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21

Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study is in progress during 2022. Depending on the final report, construction could be divided in stages from 2025 to 2027.



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Funding Source	Prev. Years	2023	2024	2025	2026	2027	Fut. Years	Total
Federal Funds	287,000			2,000,000	2,000,000			4,287,000
Other Local		150,000	275,000	1,000,000	450,000	875,000		2,750,000
State Aid				1,500,000	800,000	2,000,000		4,300,000
Sales Tax Revenue		450,000	825,000		550,000	625,000		2,450,000
Total	287,000	600,000	1,100,000	4,500,000	3,800,000	3,500,000		$13,787,000

Expenditure Type	Prev. Years	2023	2024	2025	2026	2027	Fut. Years	Total
Construction				4,500,000	3,500,000	3,500,000		11,500,000
Design Engineering		600,000			300,000			900,000
Preliminary Engineering	287,000							287,000
Right of Way			1,000,000					1,000,000
Utility			100,000					100,000
Total	287,000	600,000	1,100,000	4,500,000	3,800,000	3,500,000		$13,787,000

Construction Year: 2026

East Side Corridor

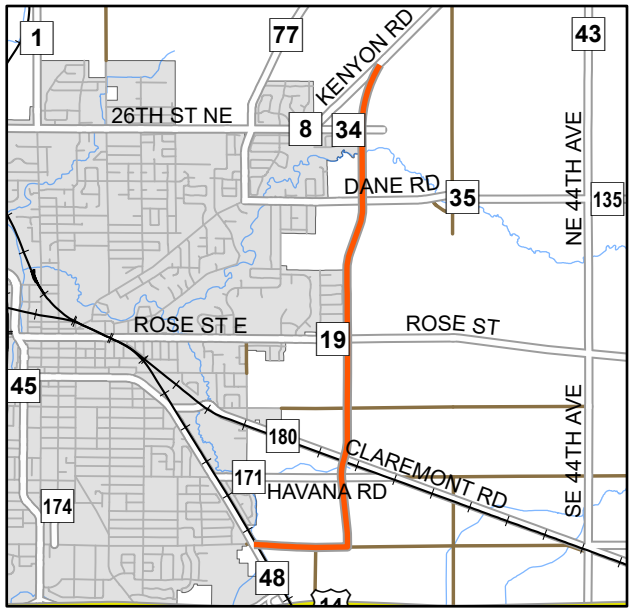
City of Owatonna & Owatonna Township

Project Number	Project Type
CP 074-021-006	Expansion

Functional Classification

NA

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	4.21



Project Description

Constructs a north-south route on the east side of the City of Owatonna from near the US 218/18th Street SE intersection to CSAH 34 (26th Street NE). A Feasibility Study and Environmental Report is in progress. Depending on the final report, construction could be divided in stages. A multi-use trail will also be constructed along side the route.

Project Justification

Traffic has no direct route for traveling between the northeast part and the southeast part of Owatonna. All existing highways and streets direct traffic towards the downtown area adding unnecessary traffic in the downtown area and increasing travel times. In 1999, Steele County and the City of Owatonna recorded an Official Map of a future north-south road from 26th Street to US 14, calling it the East Side Corridor. In 2005, the County recorded an Official Map of the Owatonna Beltline, consisting in part of CSAH 43 to the east. While CSAH 43 will have connections to US 14 and will provide a north-south connection for future growth, it does not provide benefits for current needs of traffic on the east side of the City, especially with the relocation of the high school near the intersection of CSAH 48 and 18th Street SE.

Funding Source	Prev. Years	2024	2025	2026	2027	2028	Fut. Years	Total
Federal Funds	287,000			4,000,000				4,287,000
Other Local		30,000	105,000	410,000	315,000			860,000
Sales Tax Revenue	20,000	570,000	1,995,000	3,400,000	3,585,000			9,570,000
State Aid				1,390,000	3,400,000			4,790,000
Total	307,000	600,000	2,100,000	9,200,000	7,300,000			19,507,000

Expenditure Type	Prev. Years	2024	2025	2026	2027	2028	Fut. Years	Total
Construction				9,200,000	7,300,000			16,500,000
Design Engineering		600,000	300,000					900,000
Preliminary Engineering	307,000							307,000
Right of Way			1,500,000					1,500,000
Utility			300,000					300,000
Total	307,000	600,000	2,100,000	9,200,000	7,300,000			19,507,000

Construction Year: 2026

East Side Corridor

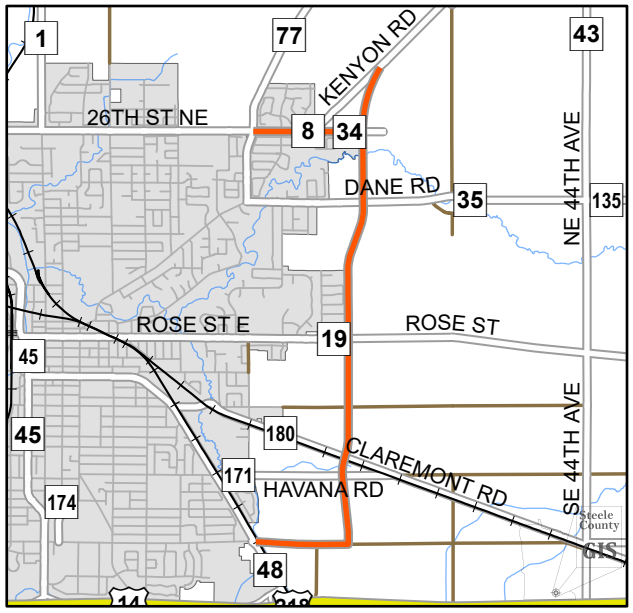
City of Owatonna & Owatonna Township

Project Number	Project Type
074-070-010 & 074-021-006	Expansion

Functional Classification

Major Collector

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	5.01



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Funding Source	Prev. Years	2025	2026	2027	2028	2029	Fut. Years	Total
Federal Funds	223,984		4,000,000					4,223,984
Fund Balance		200,000						200,000
Other Local		140,000	450,000	350,000				940,000
Sales Tax Revenue	20,000	3,160,000	3,400,000	5,250,000				11,830,000
State Aid			3,150,000	3,400,000				6,550,000
Total	243,984	3,500,000	11,000,000	9,000,000				23,743,984

Expenditure Type	Prev. Years	2025	2026	2027	2028	2029	Fut. Years	Total
Design Engineering		1,500,000						1,500,000
Preliminary Engineering	243,984	200,000						443,984
Right of Way		1,500,000						1,500,000
Utility		300,000						300,000
Construction			11,000,000	9,000,000				20,000,000
Total	243,984	3,500,000	11,000,000	9,000,000				23,743,984

Construction Year: 2027

East Side Corridor

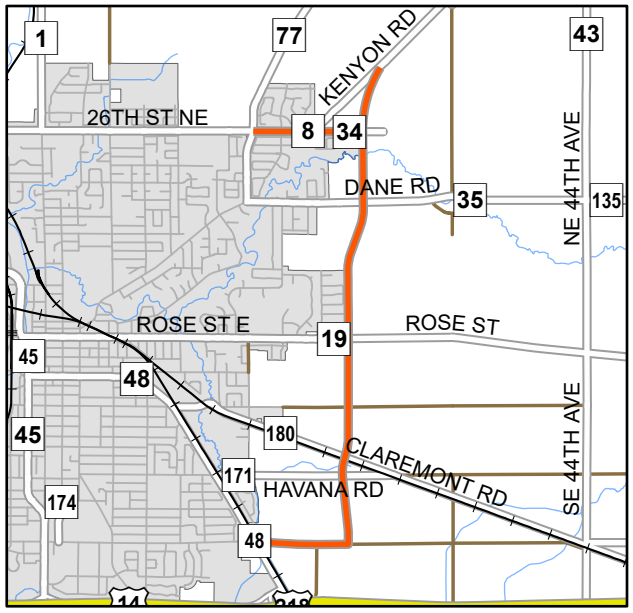
City of Owatonna & Owatonna Township

Project Number	Project Type
074-070-010 & 074-021-006	Expansion

Functional Classification

Major Collector

Pavement Condition Index	ADT Existing	Legal Load Limit	Length
NA	NA	NA	5.01



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Draft

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Funding Source	Prev. Years	2026	2027	2028	2029	2030	Fut. Years	Total
Federal Funds	223,984							223,984
Fund Balance	640,000							640,000
Other Local		140,000	500,000	400,000				1,040,000
Sales Tax Revenue	20,000	3,160,000	9,000,000	1,200,000				13,380,000
State Aid			5,500,000	8,400,000				13,900,000
Total	883,984	3,300,000	15,000,000	10,000,000				29,183,984

Expenditure Type	Prev. Years	2026	2027	2028	2029	2030	Fut. Years	Total
Construction			15,000,000	10,000,000				25,000,000
Design Engineering		1,500,000						1,500,000
Preliminary Engineering	883,984							883,984
Right of Way		1,500,000						1,500,000
Utility		300,000						300,000
Total	883,984	3,300,000	15,000,000	10,000,000				29,183,984

Comment #248

Cultural Resources Unit, Environmental Stewardship
395 John Ireland Boulevard, Mail Stop 620
Saint Paul, MN 55155-1800

December 9, 2025

VIA E-MAIL

Paul Sponholz, Steele County
PO Box 890, 3000 Hoffman Dr NW,
Owatonna, MN 55060-0890

Jack Corkle, WSB
701 Xenia Avenue S, Suite 300,
Minneapolis, MN 55416

Re: (S.P. 074-070-009) East Side Corridor Project
Sec. 1, 12, 13, 14, 23, 24 – T107N – R20W & Sec. 36 – T108N – R20W, Steele County
Steele County

Dear Mr. Sponholz and Ms. Corkle:

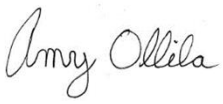
MnDOT CRU was informed that the proposed East Side Corridor Project (SP 074-070-009) no longer has federal funds and is no longer a Federal Highway Administration (FHWA) undertaking. MnDOT CRU's FHWA-delegated responsibilities for compliance with Section 106 of the National Historic Preservation Act (54 USC 300108) and its implementing regulations, 36 CFR 800, and under the terms of *the Programmatic Agreement Among the Federal Highway Administration, the Minnesota State Historic Preservation Office, the Advisory Council on Historic Preservation; the Department of the Army, Corps of Engineers, St. Paul District; and the Minnesota Department of Transportation; Regarding Implementation of the Federal-Aid Highway Program in Minnesota* (Statewide PA) do not apply as there is no longer FHWA funding associated with the project.

We also reviewed the above-referenced project to determine whether MnDOT has responsibilities under Minnesota Statutes regarding cultural resources. Compliance with Minnesota Statute is the responsibility of the entity doing, funding, or licensing the work under the Minnesota Historic Sites Act (Minn. Stat. 2024 138.661-138.669); or the agency controlling any non-federal public lands that may be affected by proposed work (e.g., right-of-way or through temporary or permanent easements) for the Minnesota Field Archaeology Act (Minn. Stat. 2024 138.31-138.42) and the Private Cemeteries Act (Minn. Stat. 2024 307.08). Steele County is responsible for compliance with the Minnesota Historic Sites Act for this project since it is funding or permitting the project. Steele County is responsible for compliance with the Minnesota Field Archaeology Act and the Private Cemeteries Act on this project since it controls the land on which the project will occur. MnDOT does not have any review duties or responsibilities under Minnesota Statutes.

MnDOT CRU's previous consultation with the State Historic Preservation Office (SHPO) consultation and SHPO comment letters (SHPO Number 2025-1020)[i] may facilitate Steele County's ability to meet its responsibilities under Minnesota Statute.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Amy Ollila
MnDOT Cultural Resources Unit Archaeologist
Amy.ollila@state.mn.us

CC: CRIS (Administrative Record)
State Aid for Local Transportation
Nicole.Foss@state.mn.us, State Historic Preservation Office

[i] Comment Letter emailed by SHPO on July 29, 2025 to Amy Ollila of MnDOT CRU, and cc'ing Jack Corkle of WSB.

Comment #249

From: Andrew Plowman
Sent: Thursday, December 11, 2025 11:31 AM
To: Jack Corkle
Subject: FW: Dot Review of East Side Corridor

From: Gaines, Ronald <ronald.gaines@steelecountymn.gov>
Sent: Thursday, December 11, 2025 11:12 AM
To: Andrew Plowman <aplowman@wsbeng.com>
Subject: FW: Dot Review of East Side Corridor

EXTERNAL EMAIL

Andrew,
Please see below from Fausto. We can discuss latter today.

Regards,

Ronald S. Gaines, PE
Public Works Director/ County Engineer
Licensed in IA, MN

Steele County
Public Works Facility
3000 Hoffman Dr. NW
Owatonna, MN 55060

Email: Ronald.Gaines@SteeleCountyMN.gov
Office: (507) 444-7671
Mobile: (507) 781-3789

From: Cabral Neto, Fausto (DOT) <fausto.cabral@state.mn.us>
Sent: Monday, December 8, 2025 10:51 AM
To: Gaines, Ronald <ronald.gaines@steelecountymn.gov>
Subject: Dot Review of East Side Corridor

Ron,

Here you are a copy of the text I received from DOT Office of Environmental Services:

“I confirmed with CRU that they would not have a role in the state process.

MnDOT no longer has a role in the project as the funding changed and is not being reviewed/approved by SALT. This should be disclosed as a change since the EAW was published in the Findings of Facts and Conclusions document with reference to the sections of the EAW where MnDOT was mentioned- section 14, section 15, table 10 and table 11."

Thanks.

Fausto Cabral
507 251 1930