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

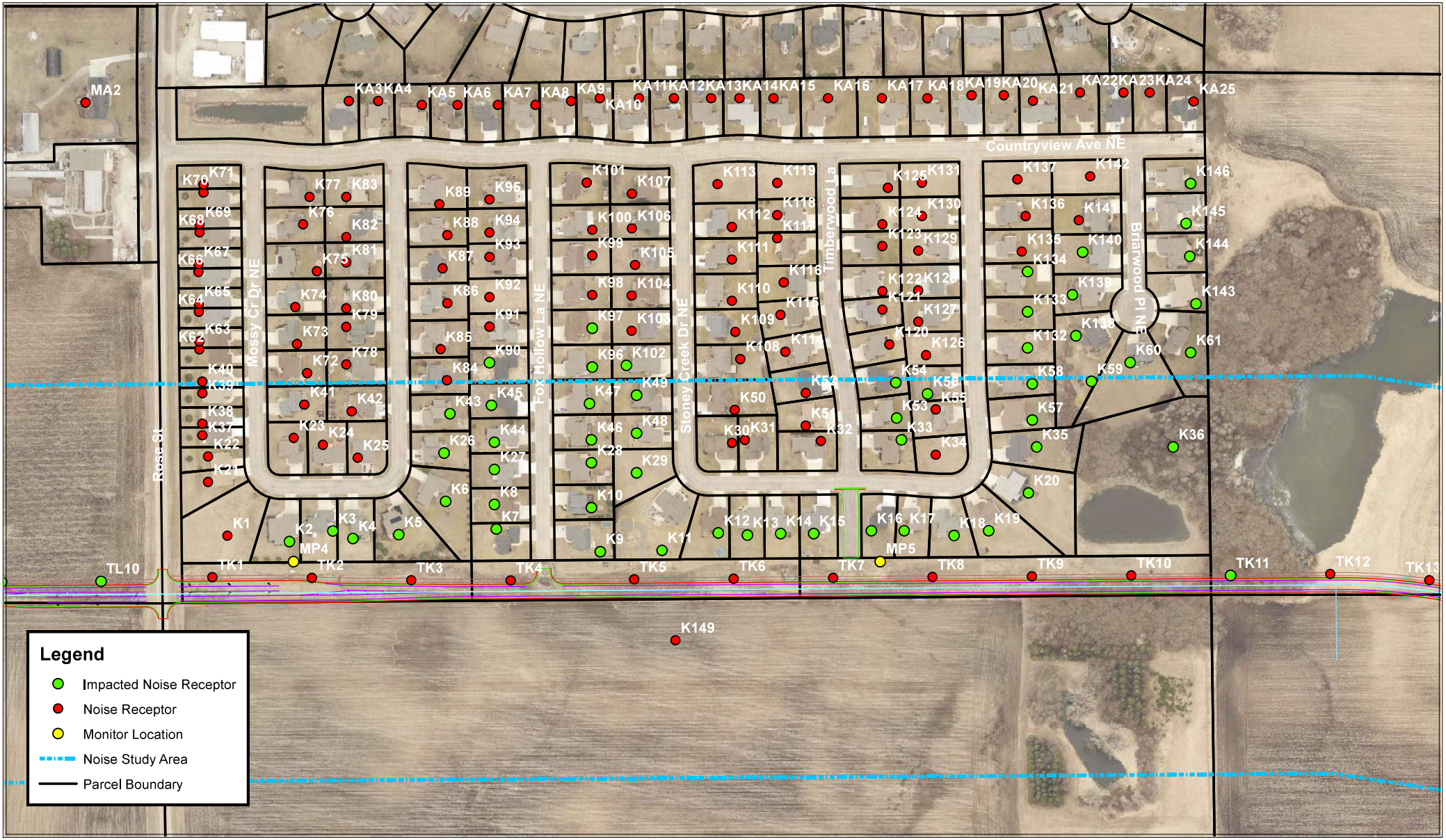
The need to contemplate mitigation equivalent to a 20-foot noise barrier constitutes an admission of **significant environmental impacts**. Significant impacts preclude a Finding of No Significant Impact (FONSI) and require preparation of an **Environmental Impact Statement (EIS)**.

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

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

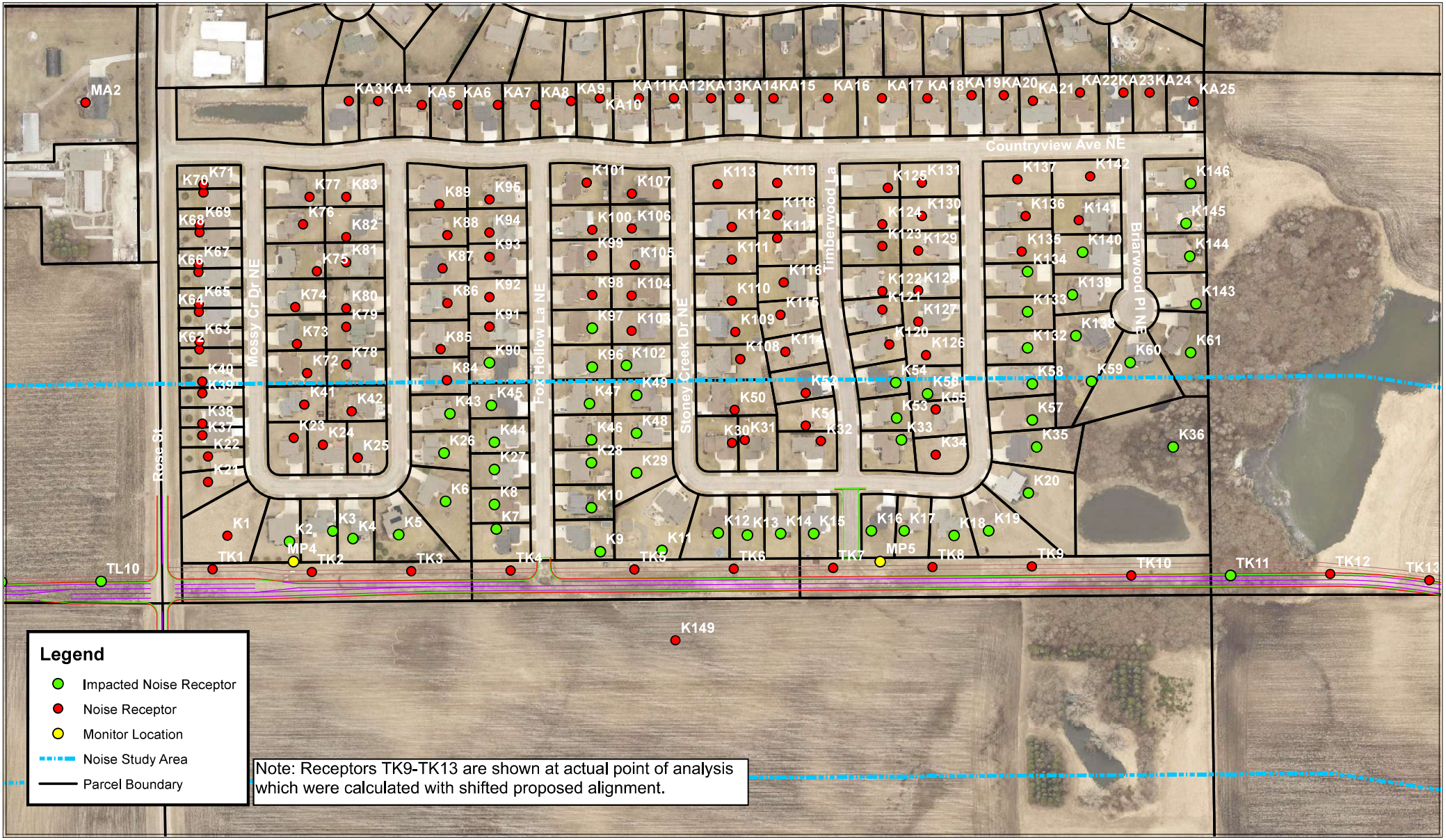
Elevated noise levels are, to a degree, unavoidable for this type of project. Scott County and its contractor(s) are exempt from local noise ordinances, it is the practice to require contractor(s) to comply with applicable local noise restrictions and ordinances to the extent that is reasonable. Advanced 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).

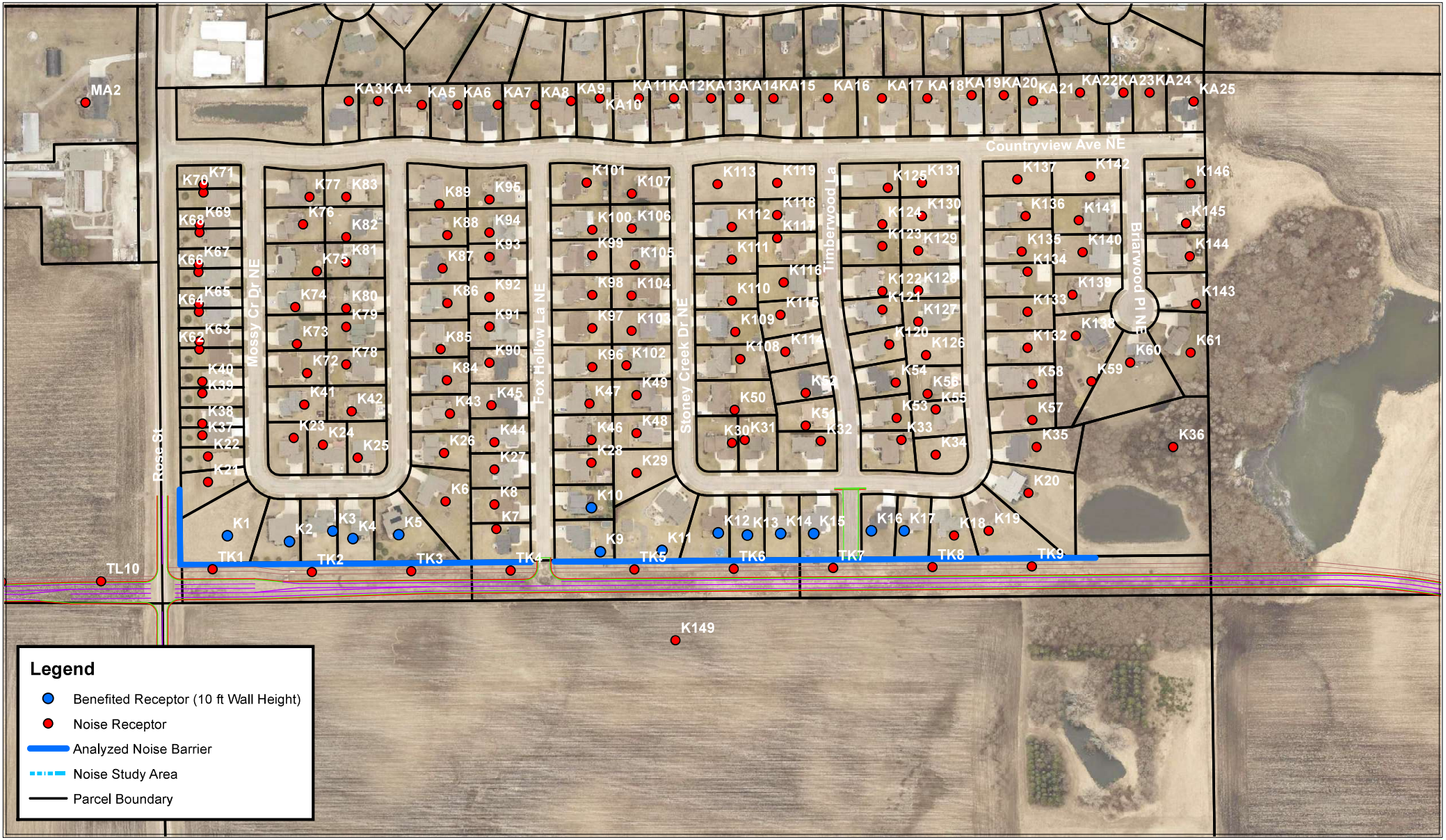
Statement of Likelihood



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	

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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

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

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

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.

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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.

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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.

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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.

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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

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.

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

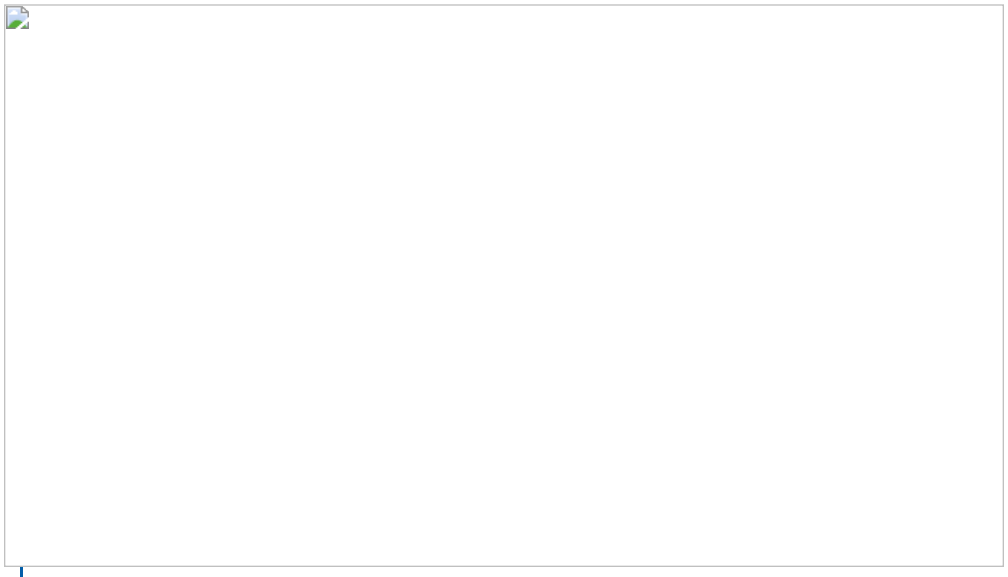
Absent preparation of an EIS, decision-makers and the public lack the information MEPA requires to evaluate the project's full environmental consequences. Accordingly, we request that the Responsible Governmental Unit order preparation of an Environmental Impact Statement prior to any further approvals 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.

IN OTHER NEWS

The American Swedish Institute celebrates its 75th annual holiday exhibition

"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."

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

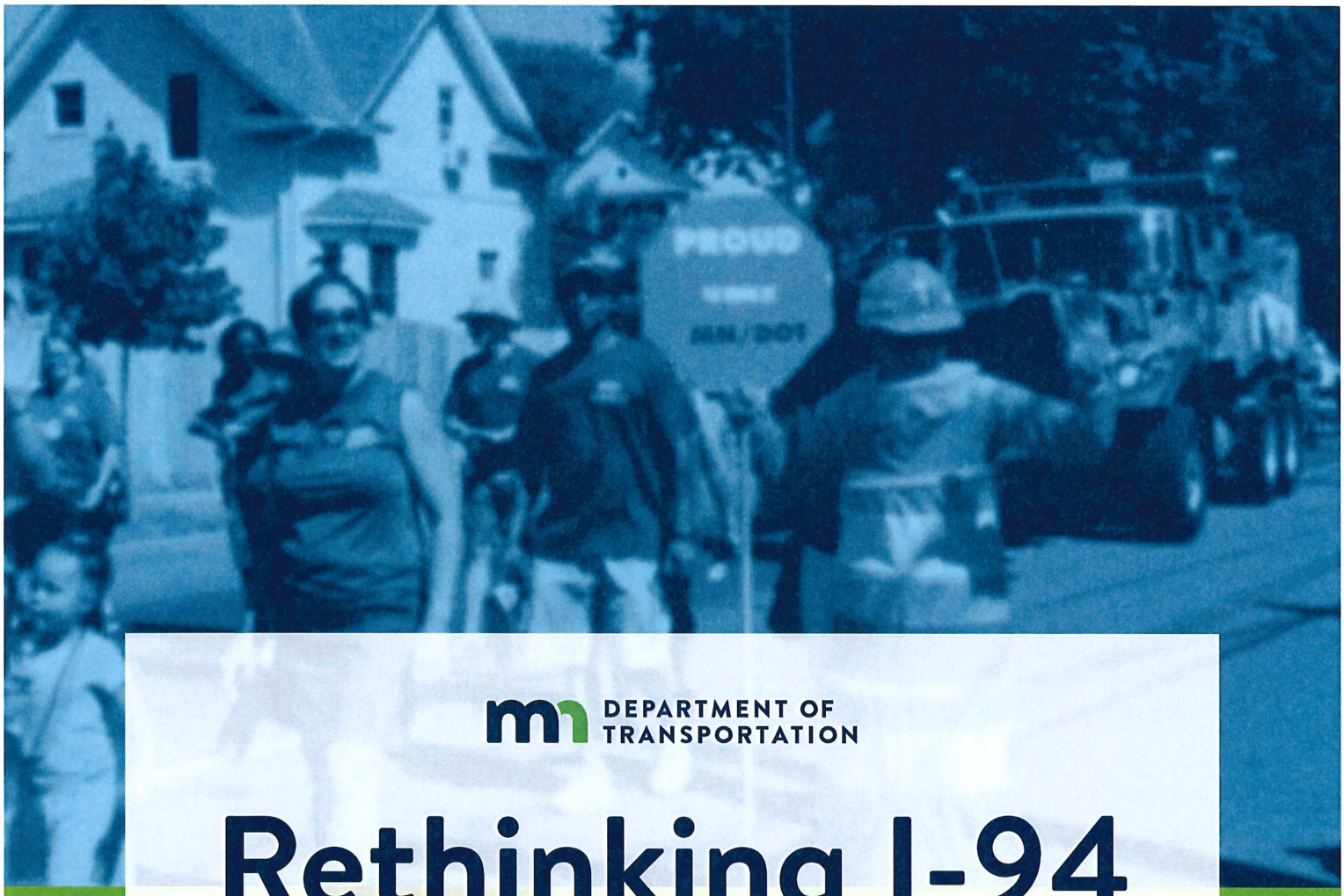
Project Description: Comprehensive study of I-94 issues and needs to guide future development projects and identify construction projects

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.

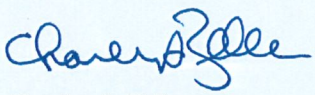
After two and a half years, I am proud of what our Rethinking I-94 team and partner agencies have learned and accomplished. Some highlights include:

- 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

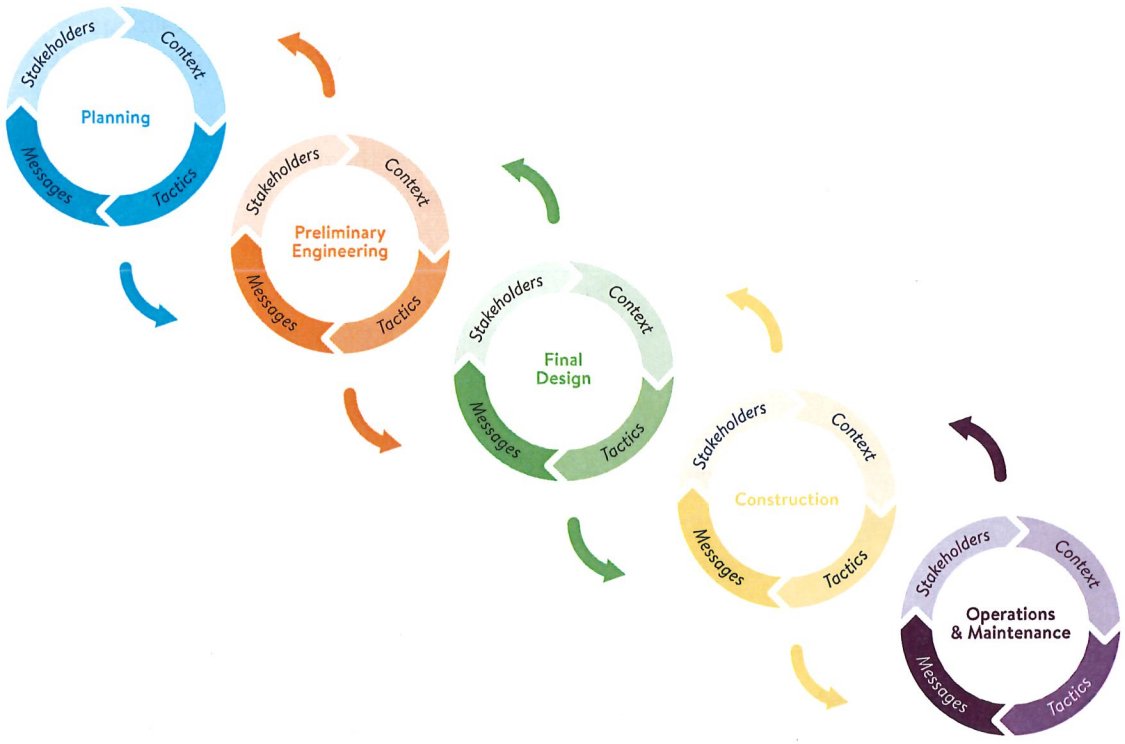
A key outcome of the innovative and comprehensive community engagement conducted during Phase 1 has been a new understanding of what communities in the I-94 corridor want from MnDOT.

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:

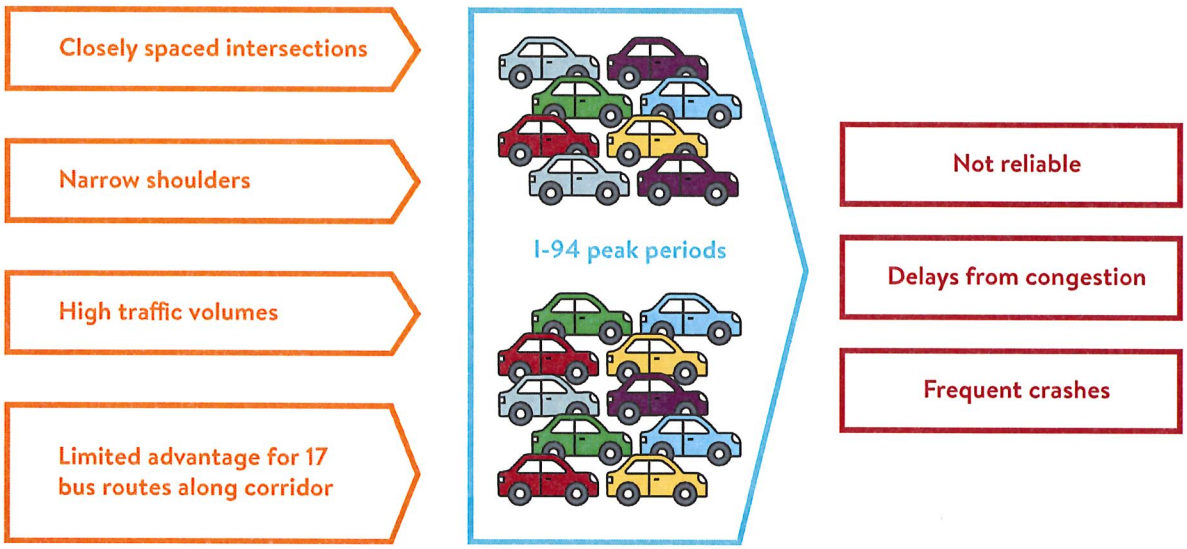
- Congestion issues
- Safety issues — bicycle, pedestrian, motorist
- Improved health and environment — noise, air quality
- No identity or sense of place
- Need for more job opportunities
- Better connections across the freeway
- More inclusivity in planning needed

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.

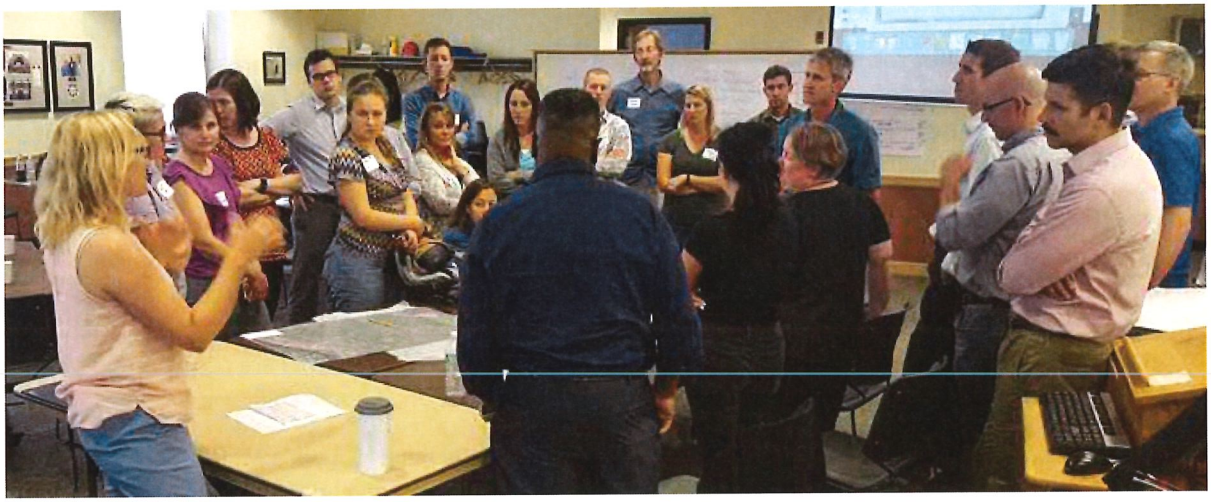
FREEWAY IMPROVEMENTS

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

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

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.

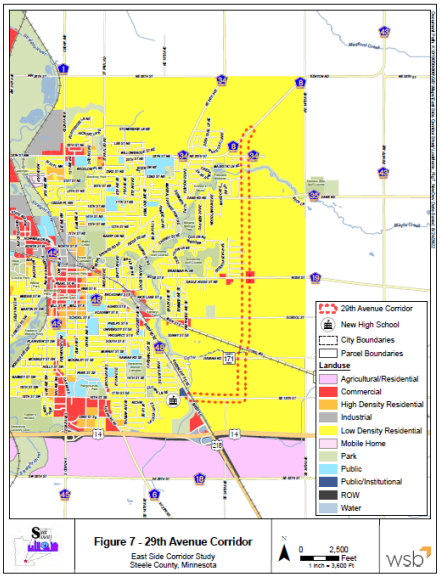
Alternative 3
This alternative rated either high or medium for all vehicle mobility measures. Relative to walkability and bikeability measures for which there are differences amongst alternatives, the alternative rated low for connections to existing trails. The majority of trips between origins and 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.

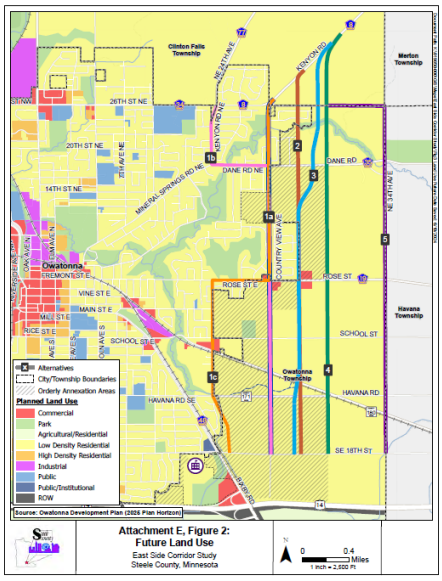
Alternative 4
This alternative rated low in multiple vehicle mobility measures, including trip length, distance, and travel time between origins and destinations; and the potential to support current and future land uses in proximity to the city's official boundary. The majority of trips between origins 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.

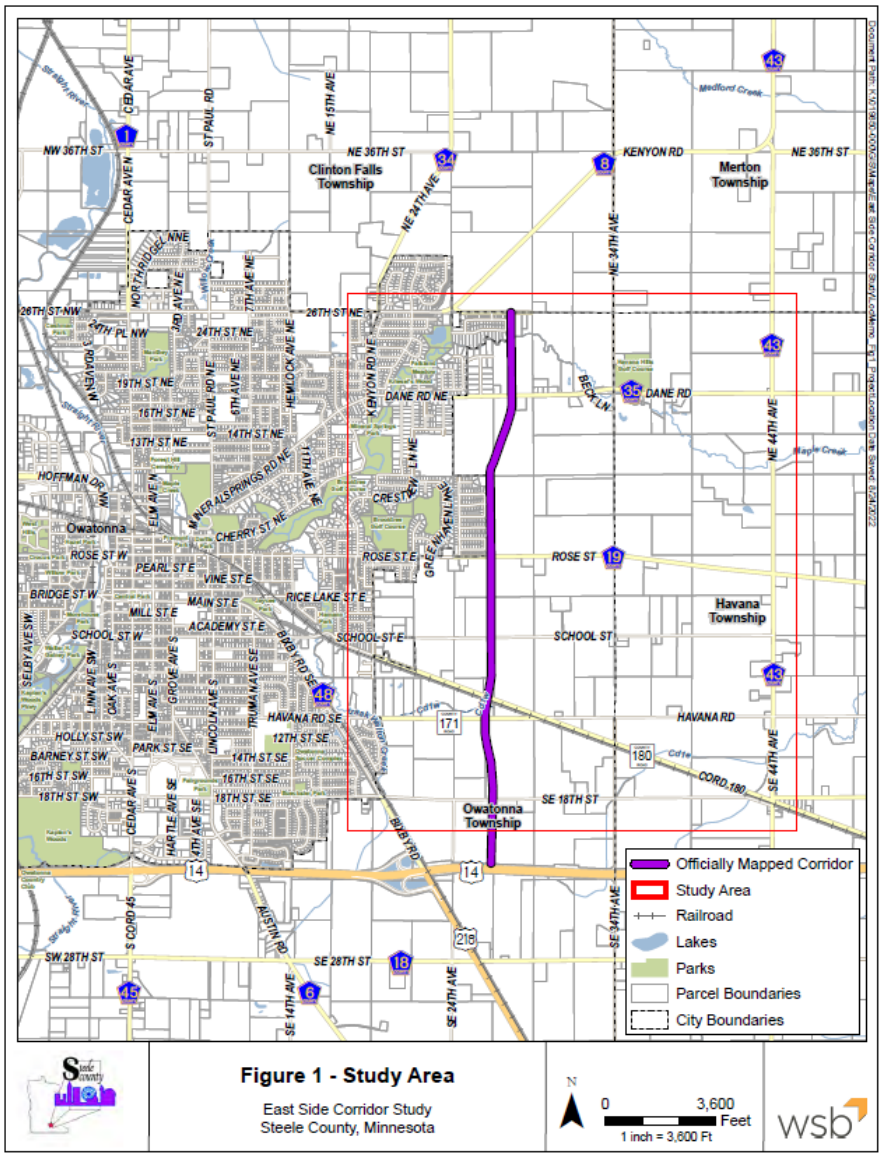
Today, 50 feet of the 150-foot-wide corridor runs through these private, occupied properties. Yet no formal relocation plans, compensation offers, or mitigation strategies have been proposed.

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.

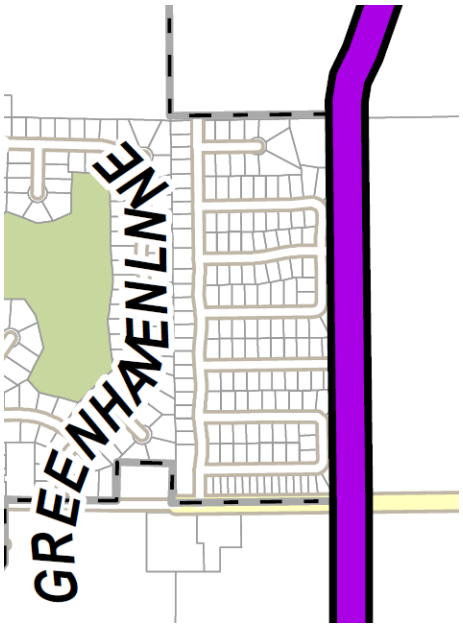
This pattern of omission and misrepresentation undermines the transparency, integrity, and credibility of the entire planning process.

Why This Matters

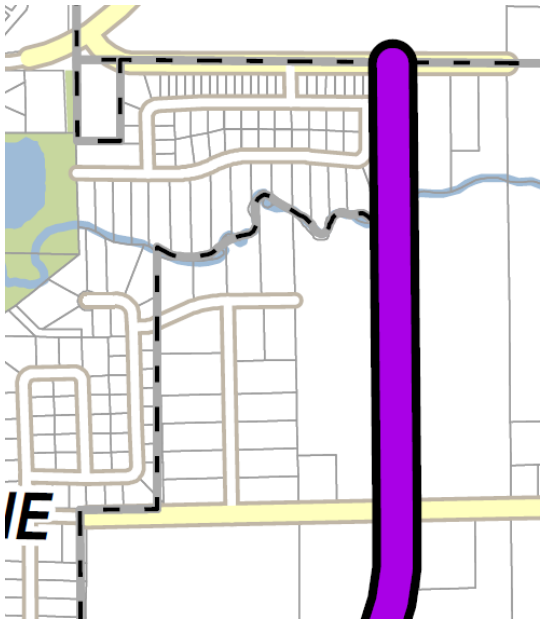
Public agencies are entrusted to act with transparency and prioritize the safety and well-being of residents. In this case:

- 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.

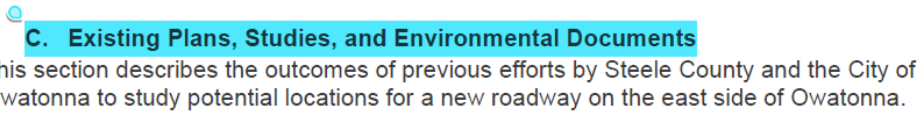
While the corridor still appears on maps, its legitimacy has eroded. Years of abandonment, approved development, and omission of key facts from the Memorandum undermine its legal and ethical standing. Reviving it now risks violating property rights and public trust.

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.



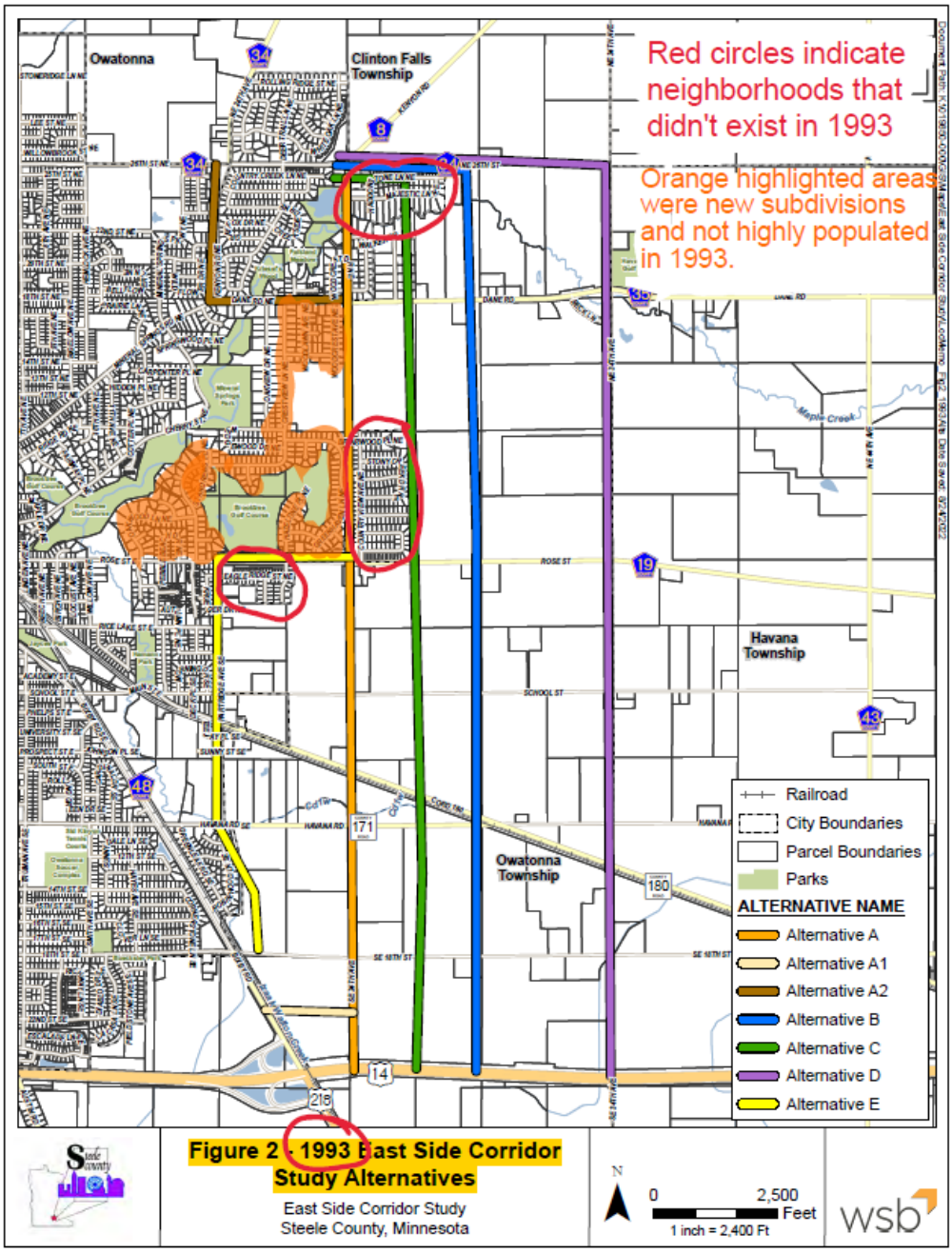
C. Existing Plans, Studies, and Environmental Documents

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

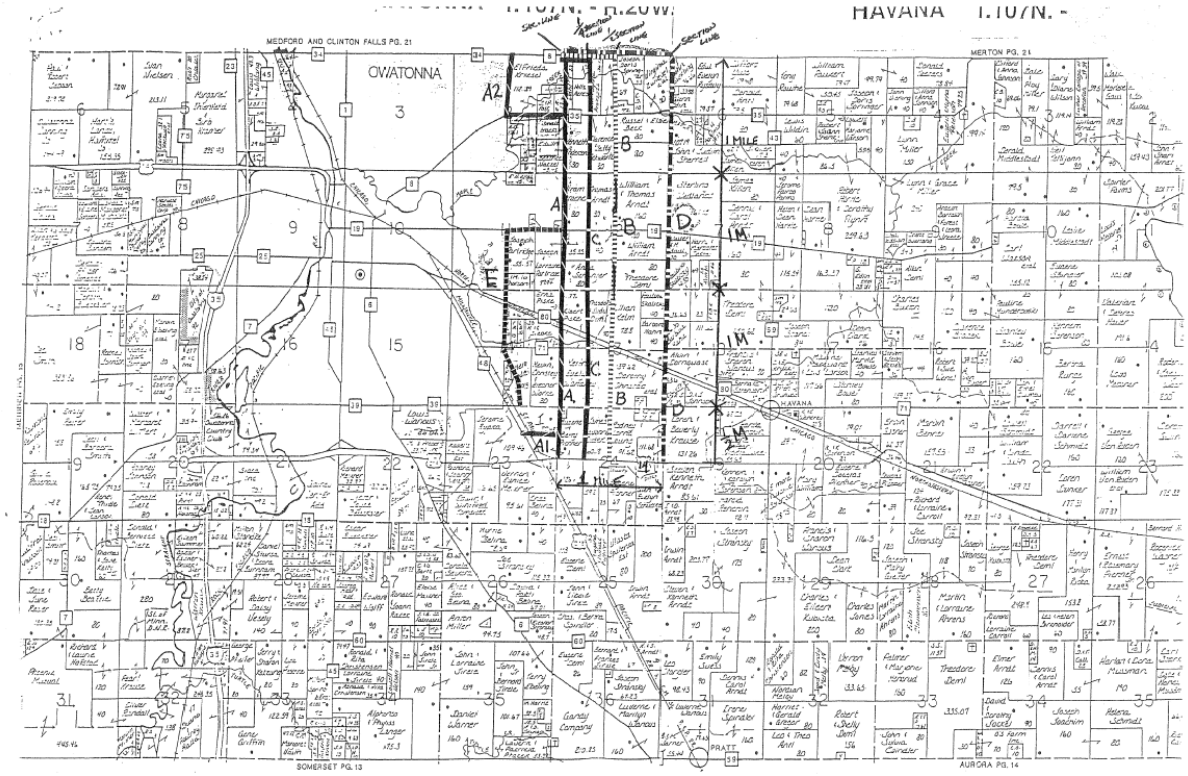


Figure R3: Maps the original 1990s alternatives, all located outside current city limits.

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.

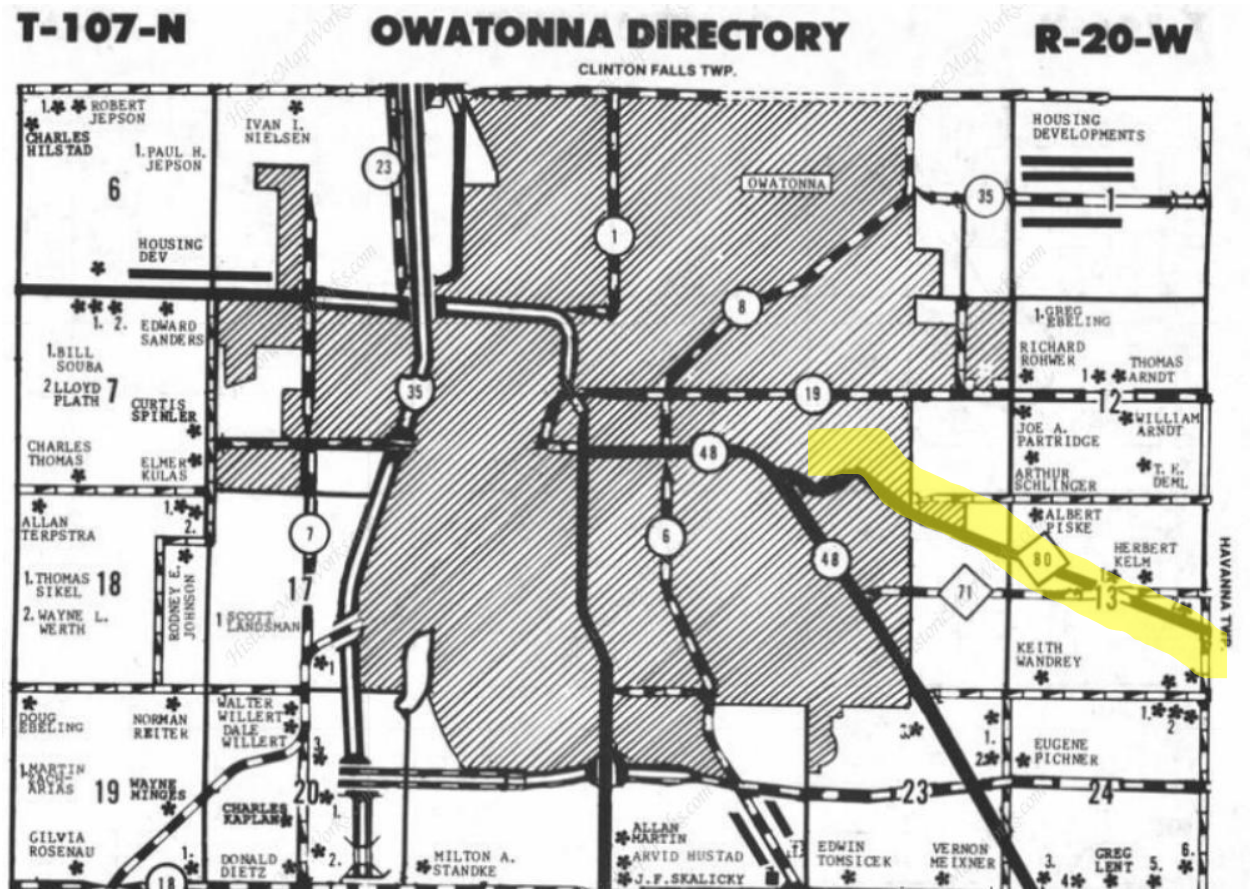


Figure R9 – 1995 Plat Map highlighting County Road 80.

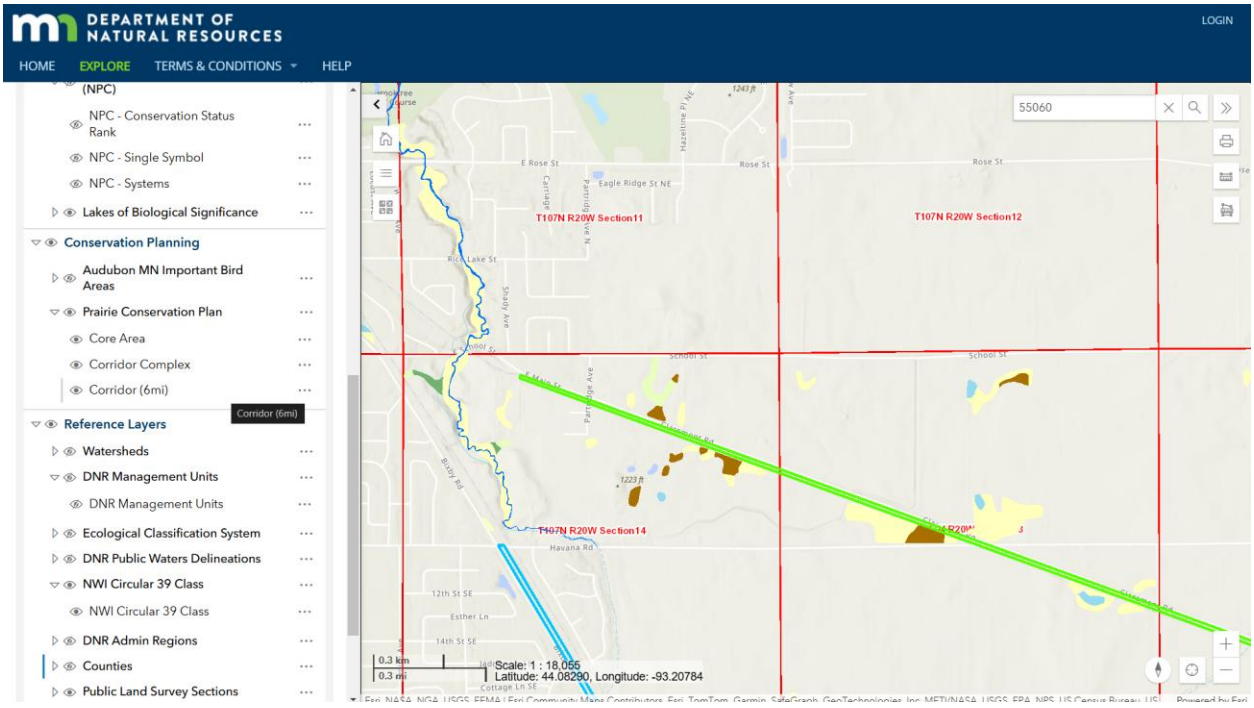


Figure R10 - MN DNR map of prairie wetlands along County Road 180/80.

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.

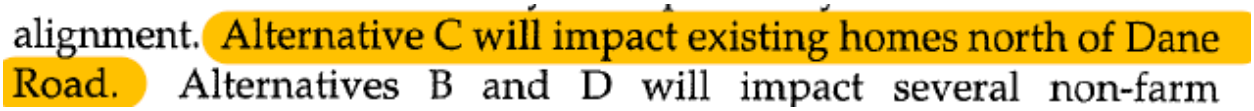

alignment. Alternative C will impact existing homes north of Dane Road. Alternatives B and D will impact several non-farm

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.

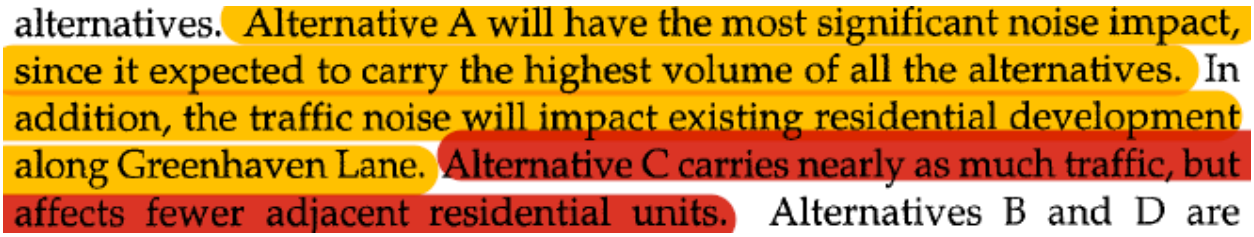

alternatives. Alternative A will have the most significant noise impact, since it expected to carry the highest volume of all the alternatives. In addition, the traffic noise will impact existing residential development along Greenhaven Lane. Alternative C carries nearly as much traffic, but affects 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

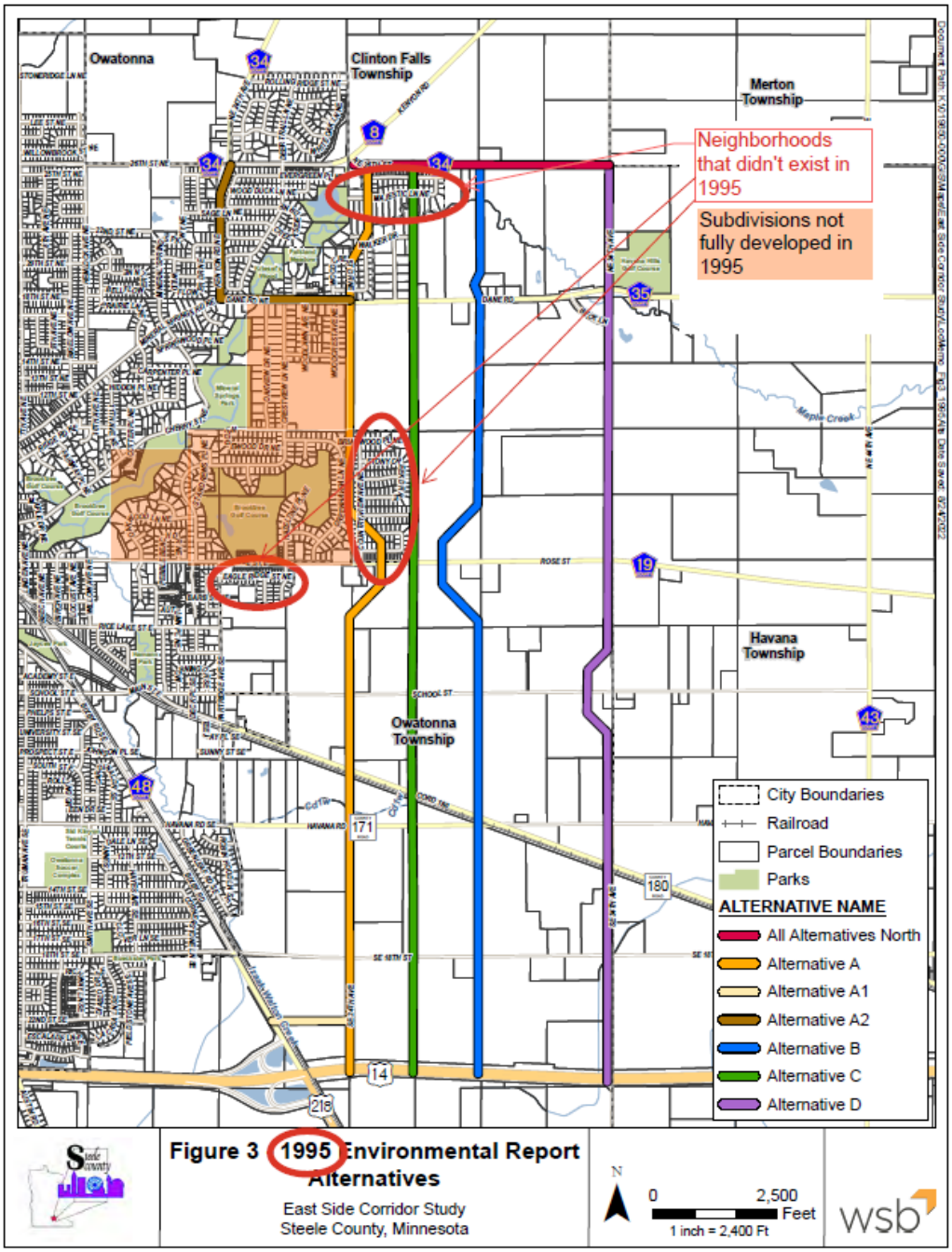
- C Provide a well-defined roadway surface showing continuous horizontal direction and movement;
- C Integrate a landscape plan that is functional and provides a connection in the project corridor;
- C Maple Creek Bridge. This is a key visual resource. The design and construction of the bridge should 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.

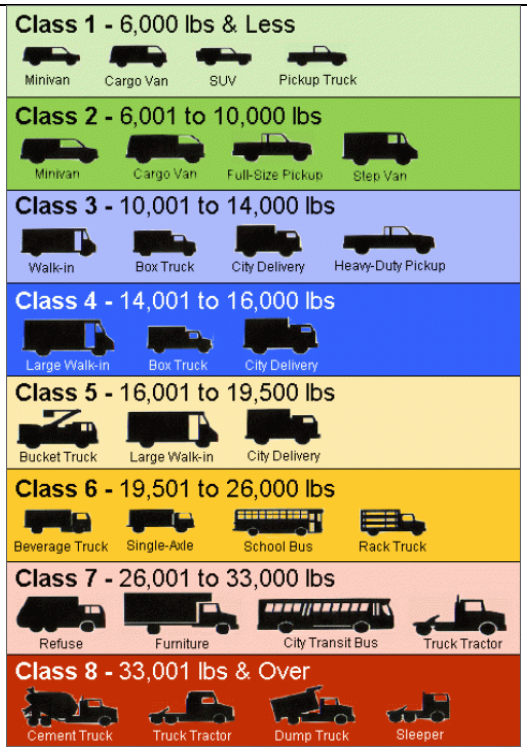


Figure R18 – Vehicle Classifications per the federal Government

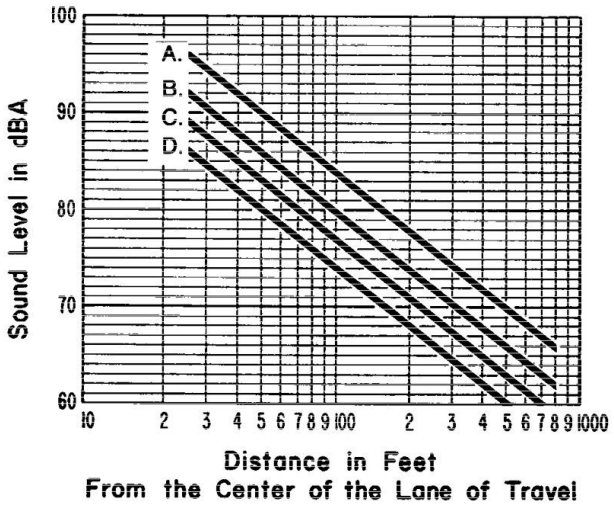


Figure R19 – Noise limits for vehicles over 10,000lbs
https://www.revisor.mn.gov/rules/7030.1040/

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.

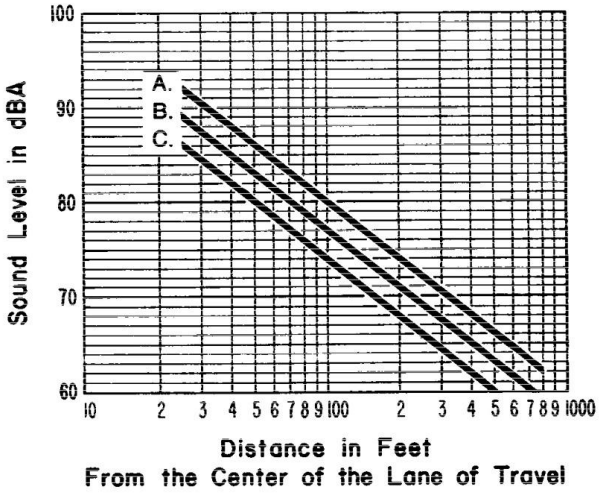


Figure R20 – Noise limits for Motorcycles
https://www.revisor.mn.gov/rules/7030.1050/

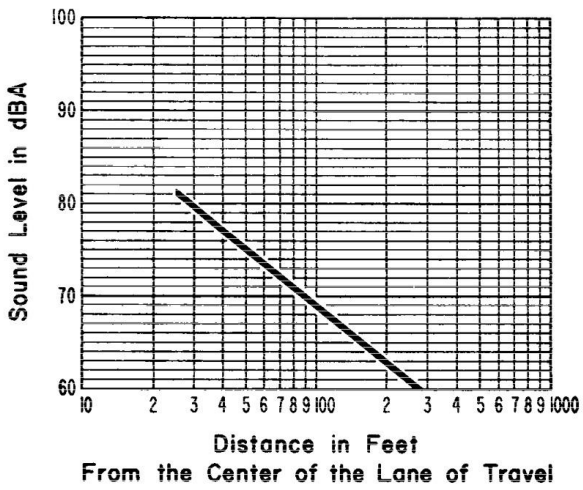


Figure R21 – Noise limits for other vehicles
https://www.revisor.mn.gov/rules/7030.1060/

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).

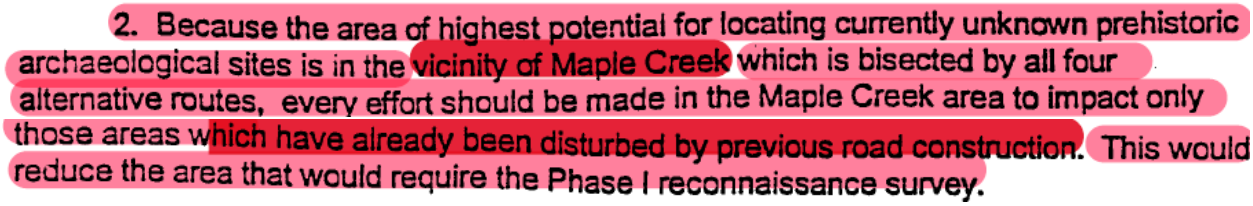

2. Because the area of highest potential for locating currently unknown prehistoric archaeological sites is in the vicinity of Maple Creek which is bisected by all four alternative routes, every effort should be made in the Maple Creek area to impact only those areas which have already been disturbed 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.

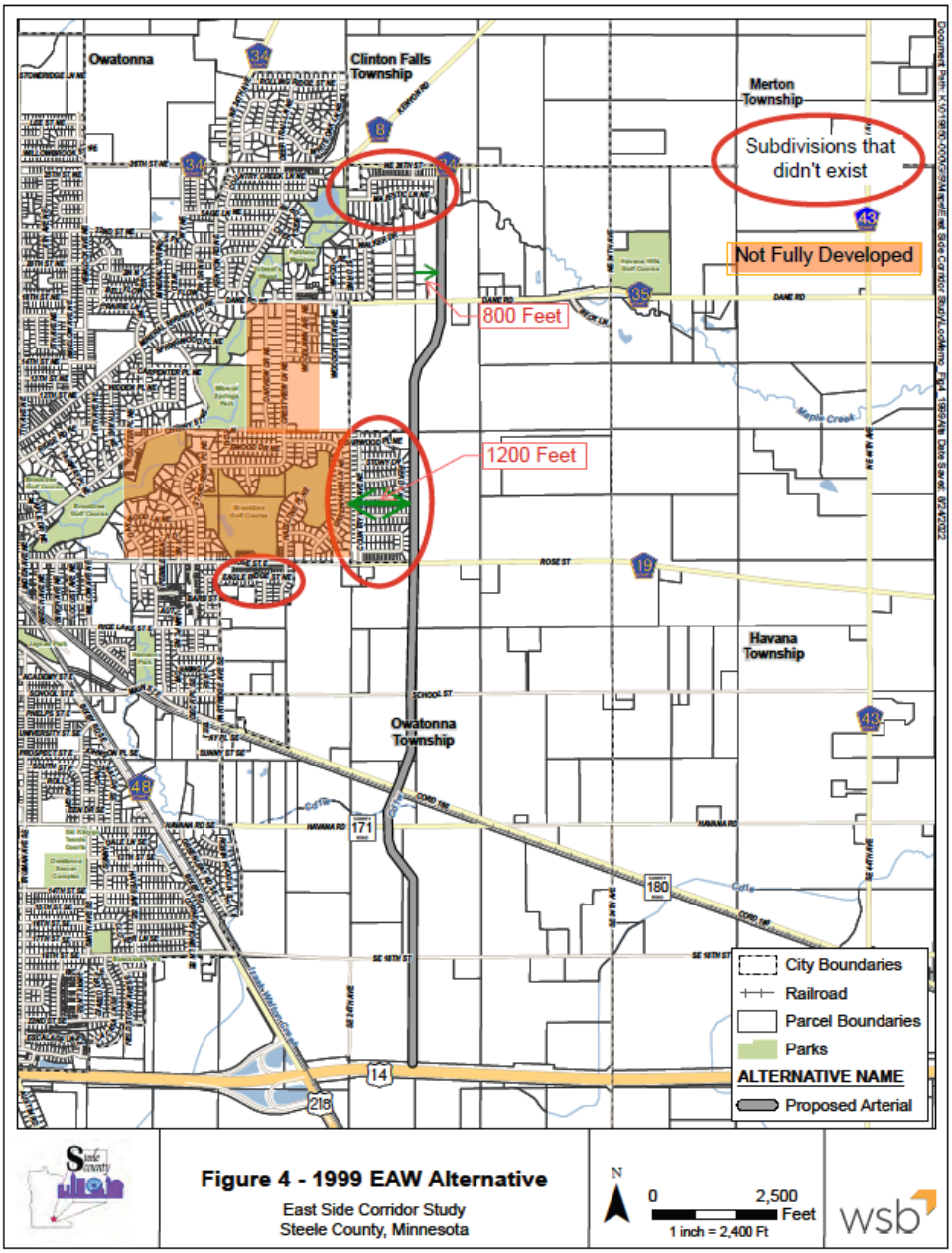
The EAW identified nine key issues, including noise impacts—and proposed a 150-foot right-of-way paired with an 800-foot setback from homes to avoid harm. This reflected a clear strategy of impact avoidance, in line with both environmental and ethical planning practices at the time.

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.

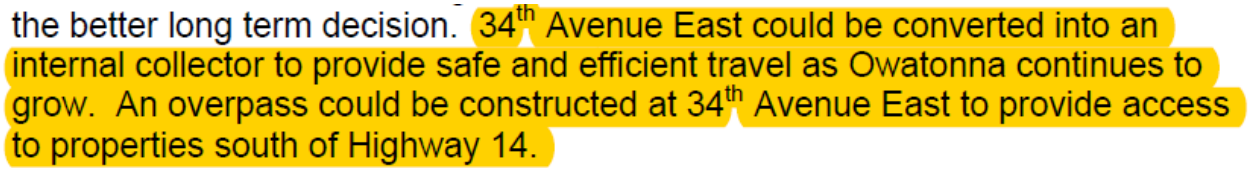
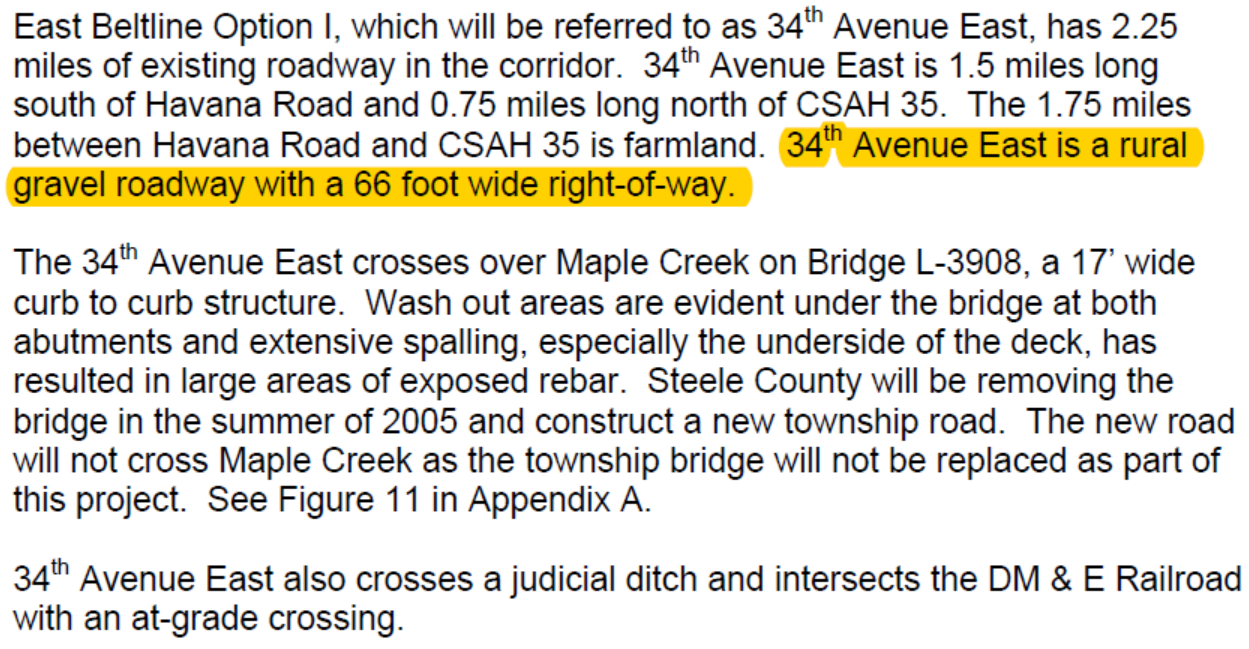

the better long term decision. 34th Avenue East could be converted into an internal collector to provide safe and efficient travel as Owatonna continues to grow. An overpass could be constructed at 34th Avenue East to provide access to properties south of Highway 14.

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).

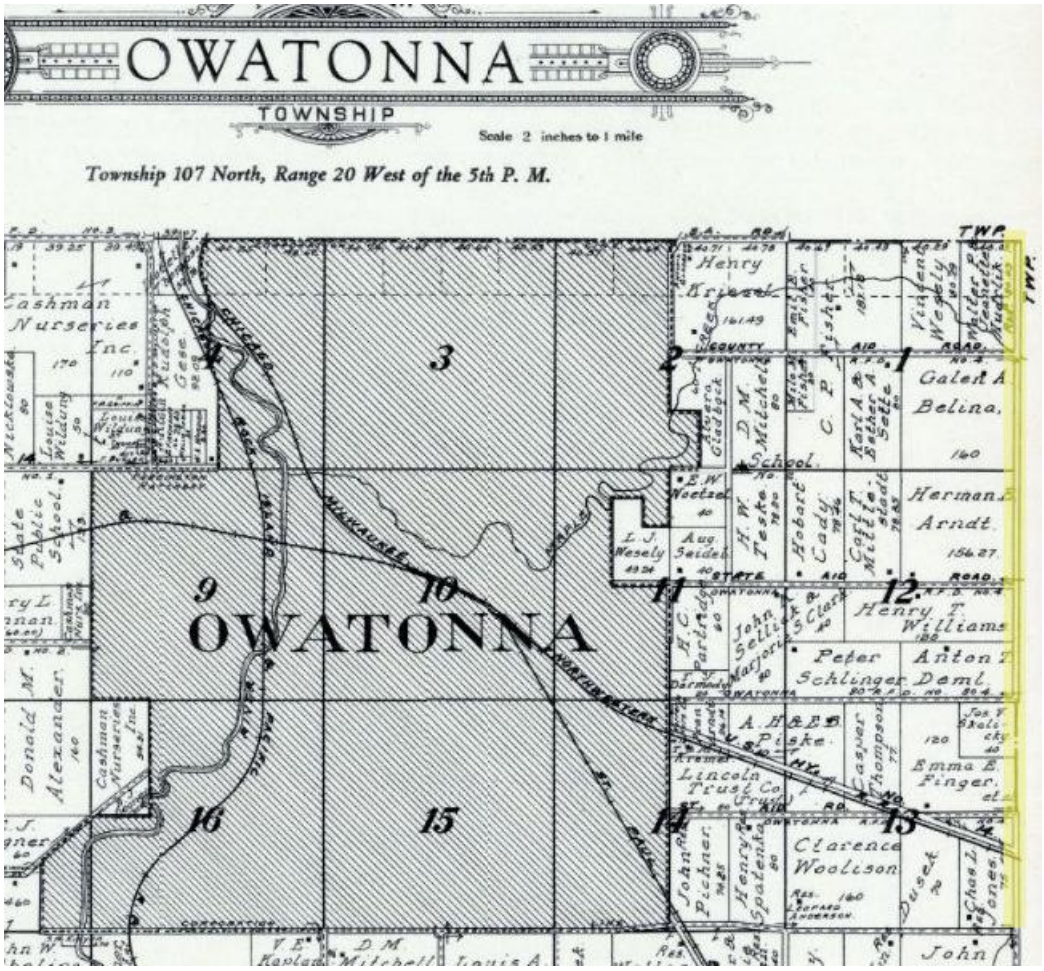


Figure R25 – *1937 Central Atlas Co.* plat of Owatonna Township showing 34th Avenue (Alternative 5).

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.

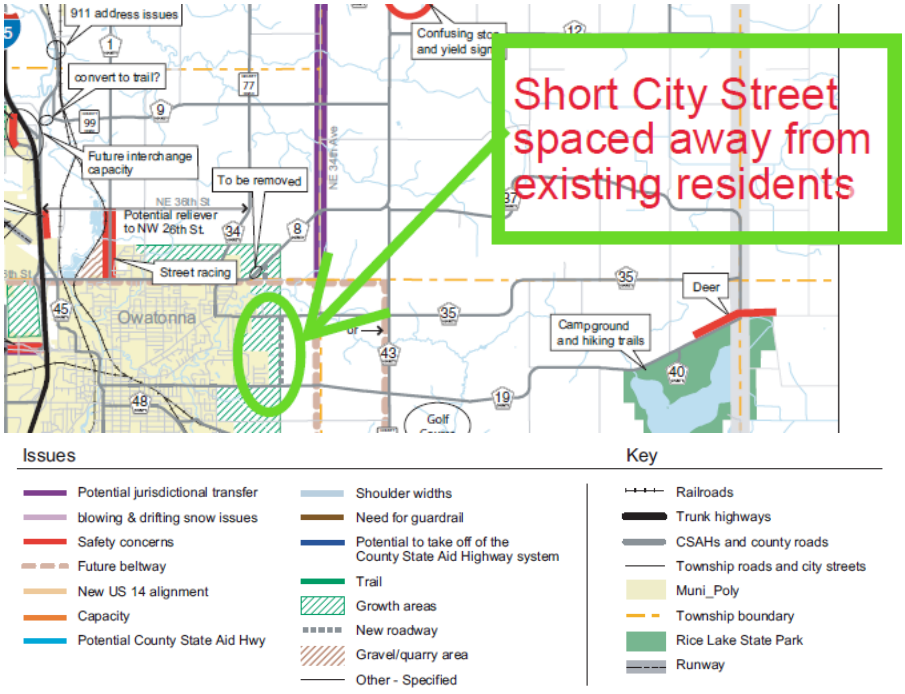


Figure R27 – The *2005–2025 Steele County Transportation Plan* illustrates planned growth between the North Country Subdivision, in its early stages of development, and a shorter proposed roadway.

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.

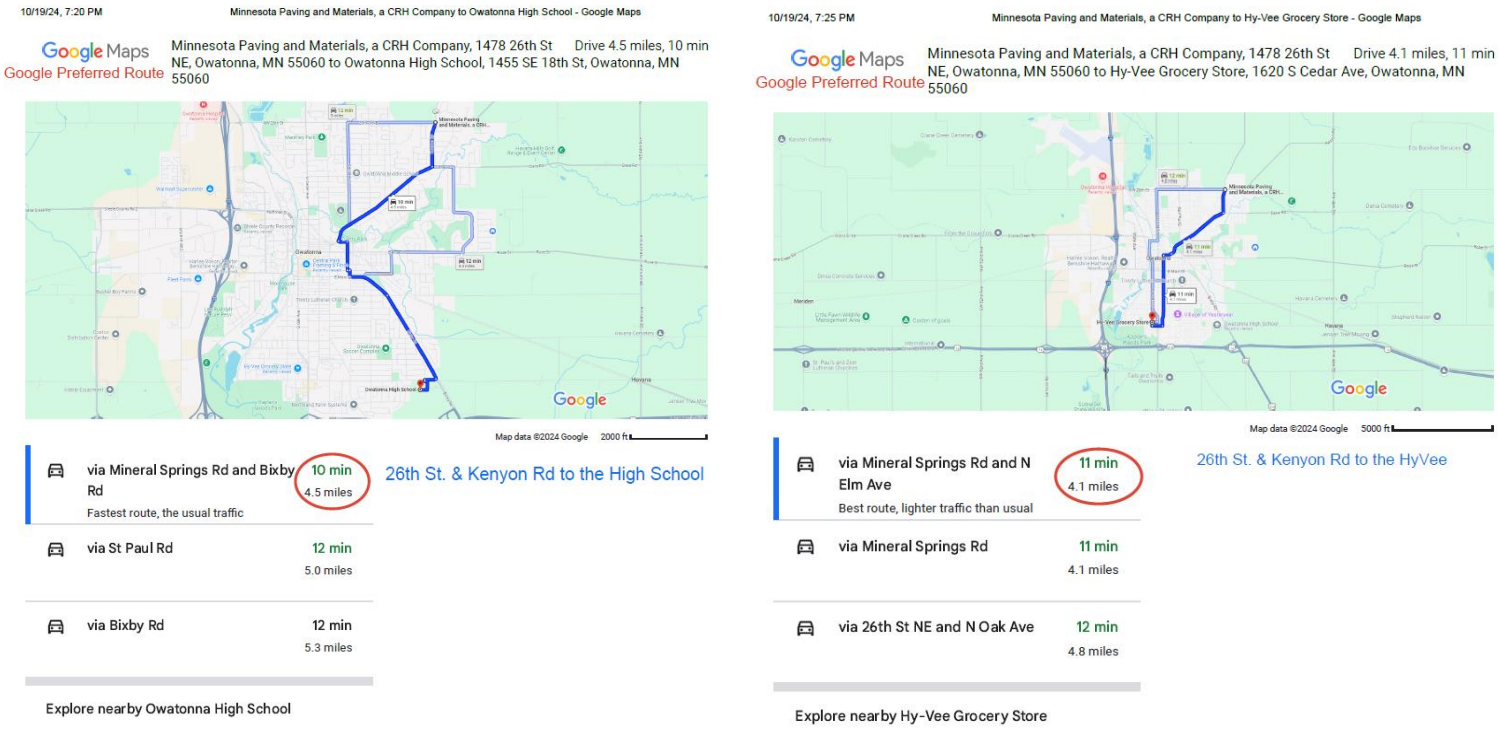


Figure R30 – 26th St. & Kenyon Rd to destination points

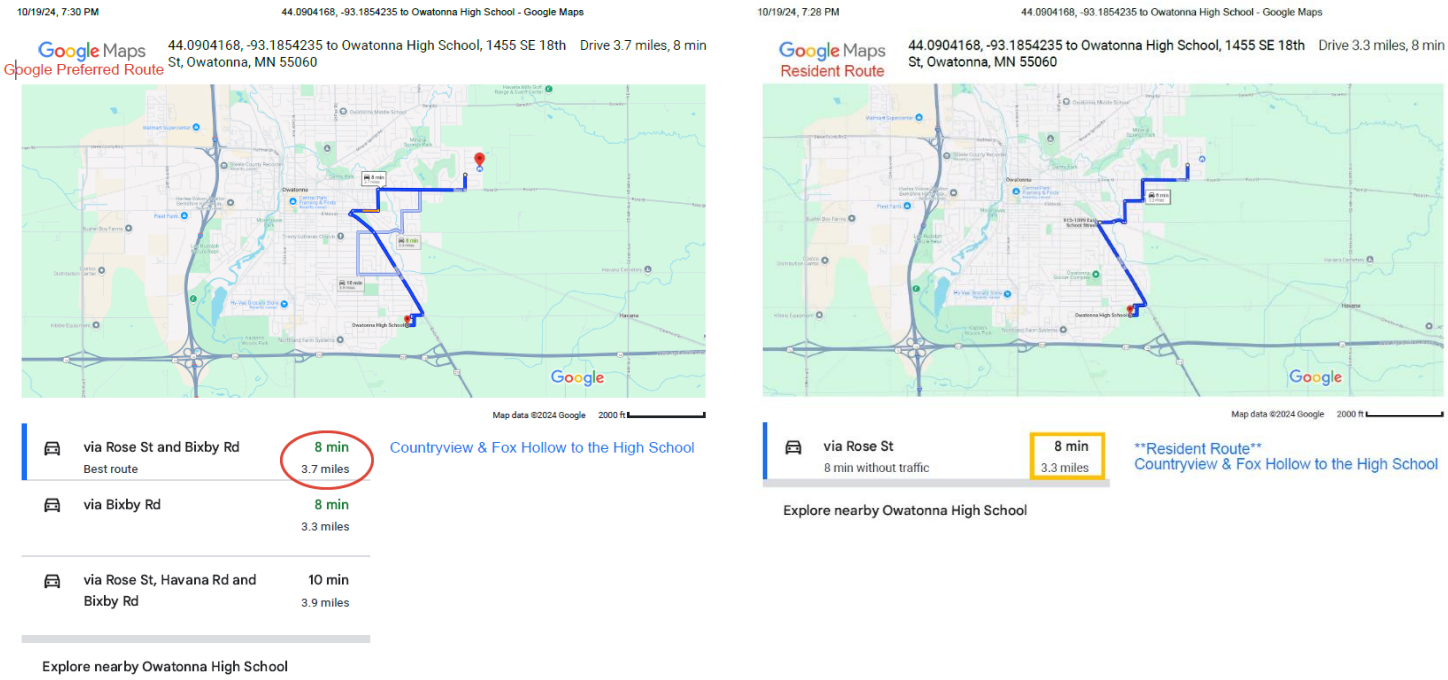


Figure R31 – Countryview & Fox Hollow Ln to the High School Google Recommended Route (left) 3.7 miles and Resident Preferred Route (right) 3.3 miles. Both 8 minutes travel time.

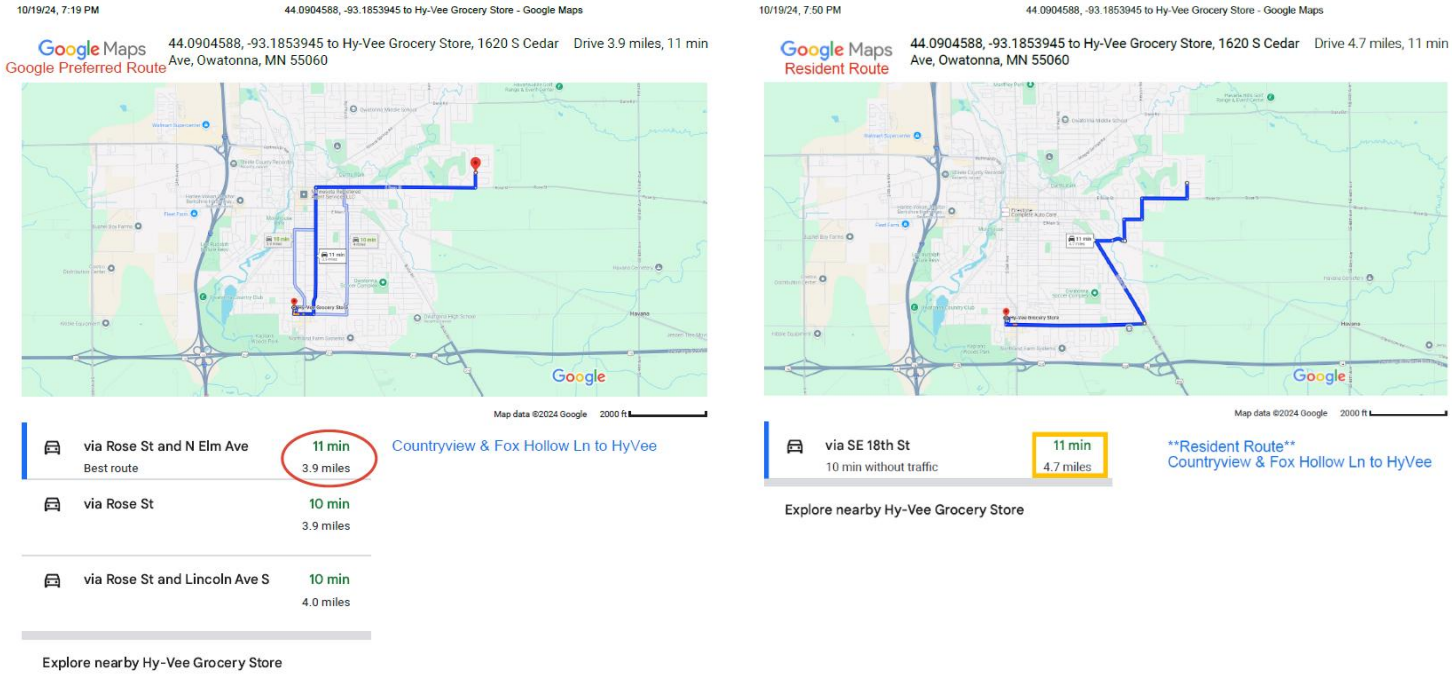


Figure R32 – Countryview & Fox Hollow Ln to Hy-Vee Google Recommended Route (left) 3.9 miles and Resident Preferred Route (right) 4.7 miles. Both 11 minutes travel time.

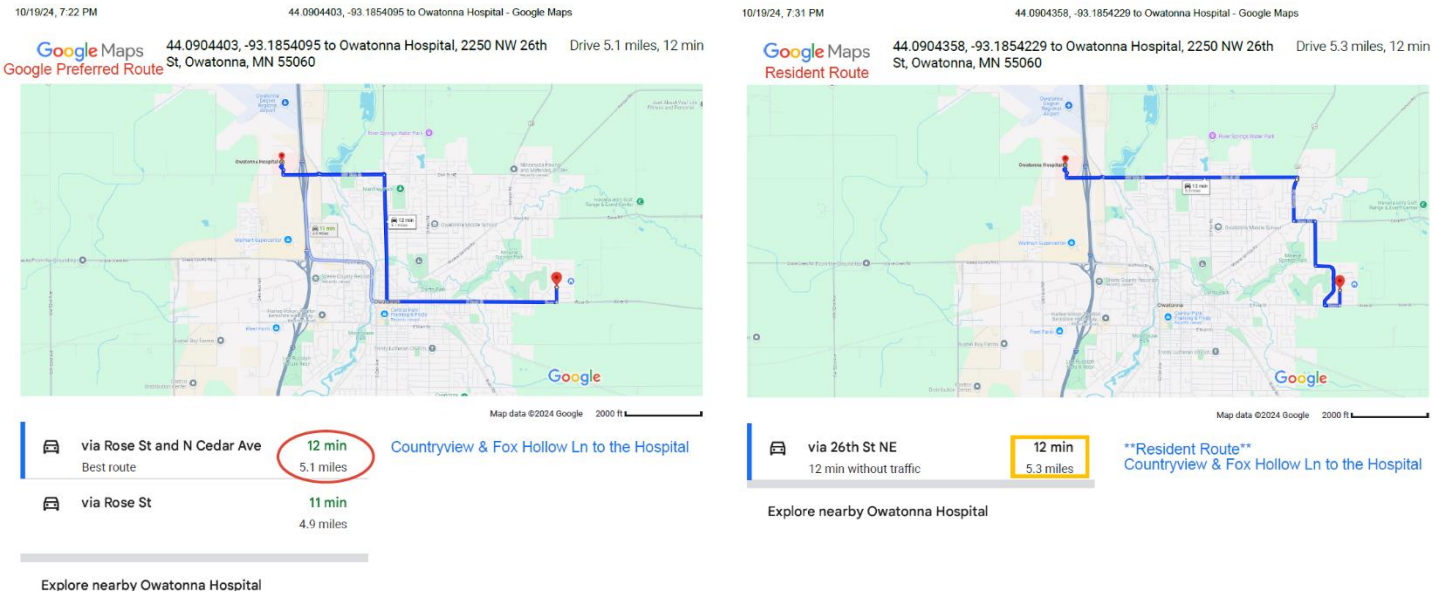


Figure R33 – Countryview & Fox Hollow Ln to the Hospital Google Recommended Route (left) 5.1 miles and Resident Preferred Route (right) 5.3 miles. Both 12 minutes travel time (although resident route is often faster).

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.

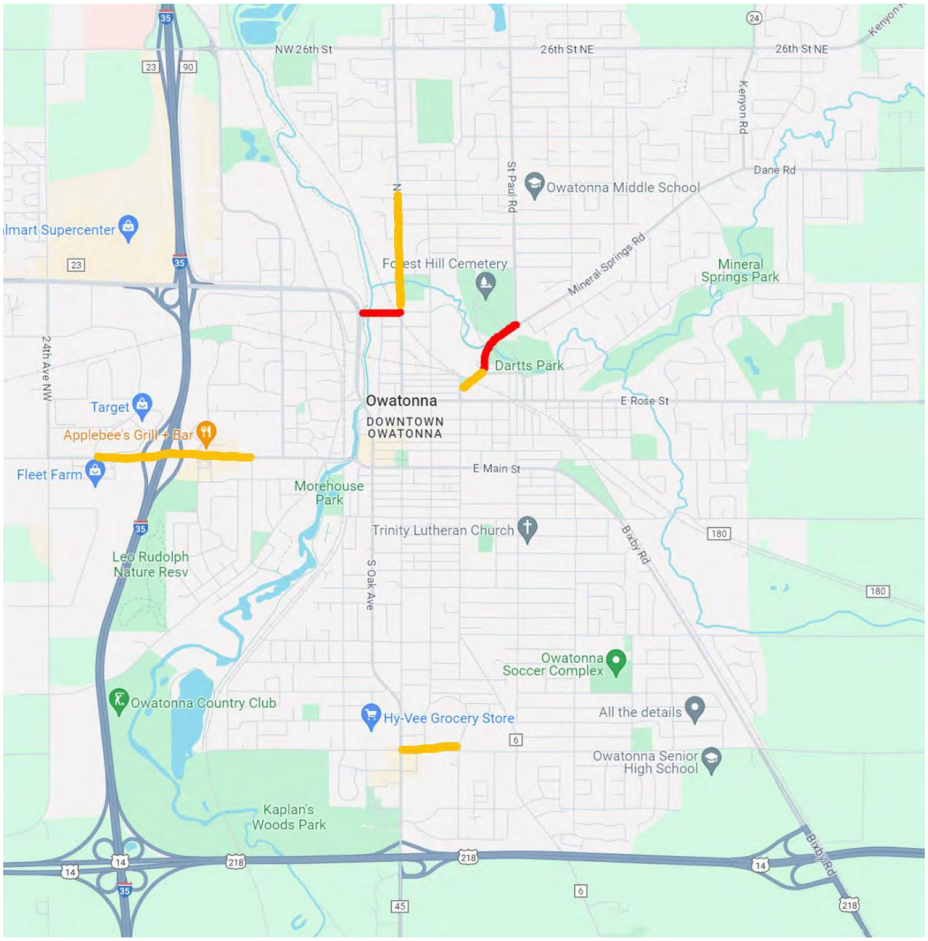
As Owatonna was designed with a spoke-and-wheel road system meant to draw people into the downtown core, the report also fails to address potential economic and logistical consequences of diverting traffic away from downtown—the very heart of the city.

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.

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
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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.

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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.

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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.

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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

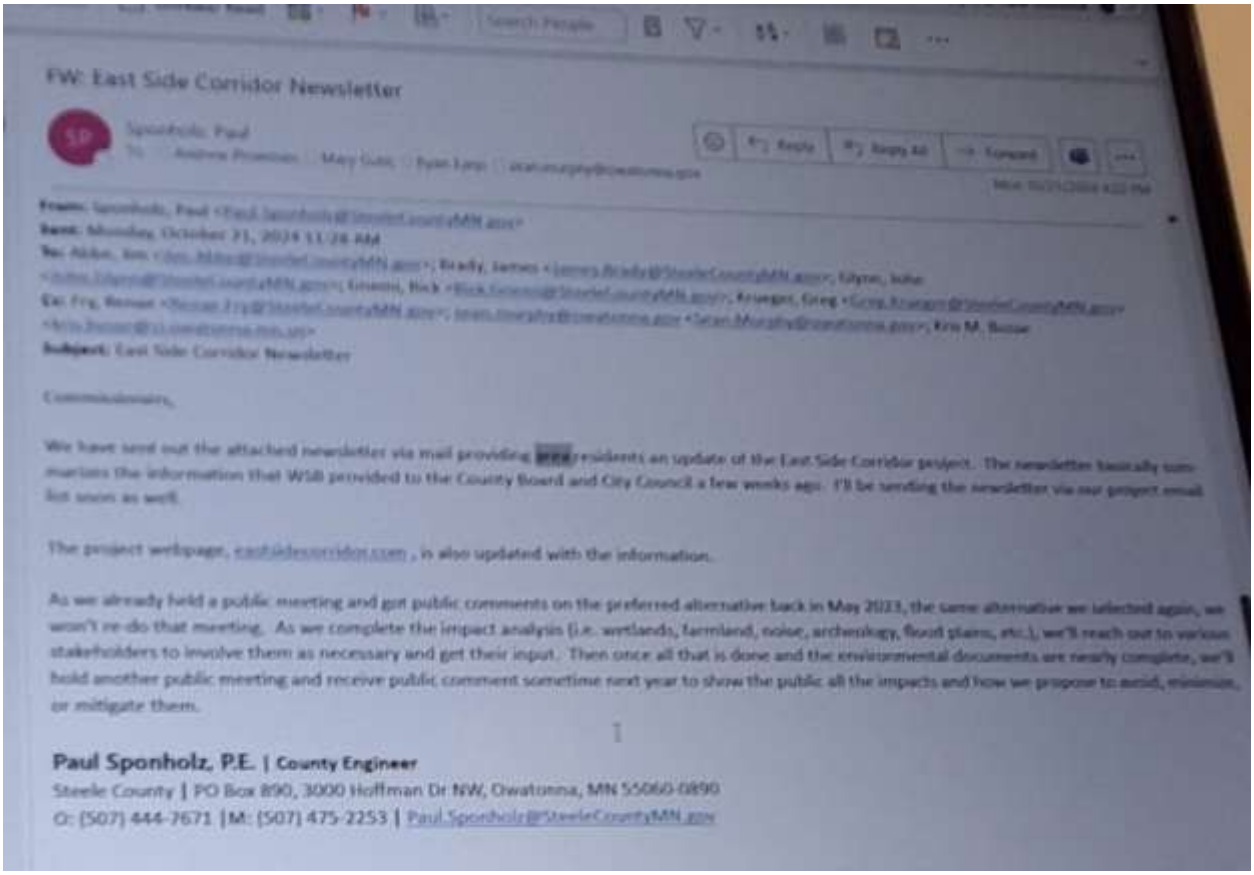
From: Cabral Neto, Fausto (DOT)
Sent: Monday, September 30, 2024 7:29 AM
To: Sponholz, Paul <Paul.Sponholz@SteeleCountyMN.gov>; Bottos, Elisa (DOT) <[redacted]>; Fry, Renae <Renae.Fry@SteeleCountyMN.gov>; sean.murphy@owatonna.gov
Subject: RE: Request for Clarification on East Side Corridor Project Updates 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

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,

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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

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.

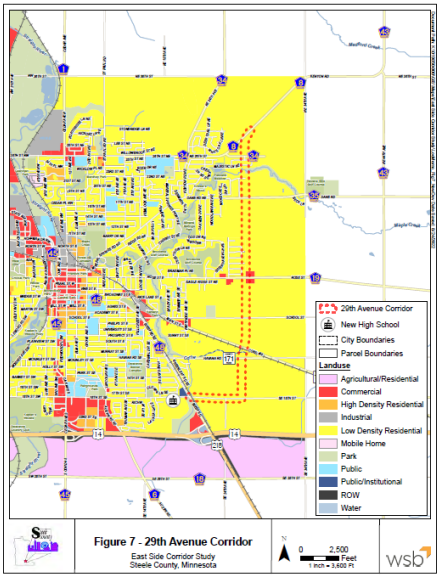
Alternative 3
This alternative rated either high or medium for all vehicle mobility measures. Relative to walkability and bikeability measures for which there are differences amongst alternatives, the alternative rated low for connections to existing trails. The majority of trips between origins and 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.

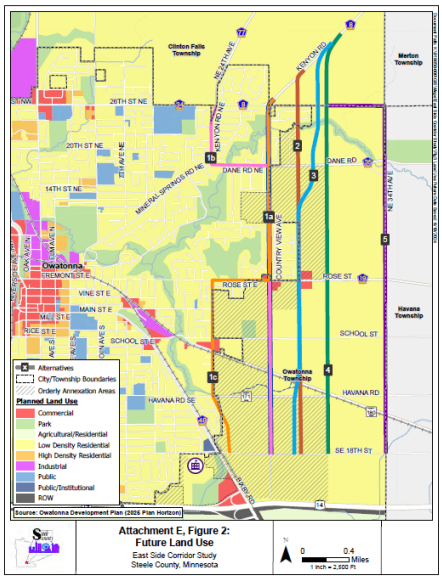
Alternative 4
This alternative rated low in multiple vehicle mobility measures, including trip length, distance, and travel time between origins and destinations; and the potential to support current and future land uses in proximity to the city's official boundary. The majority of trips between origins 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.

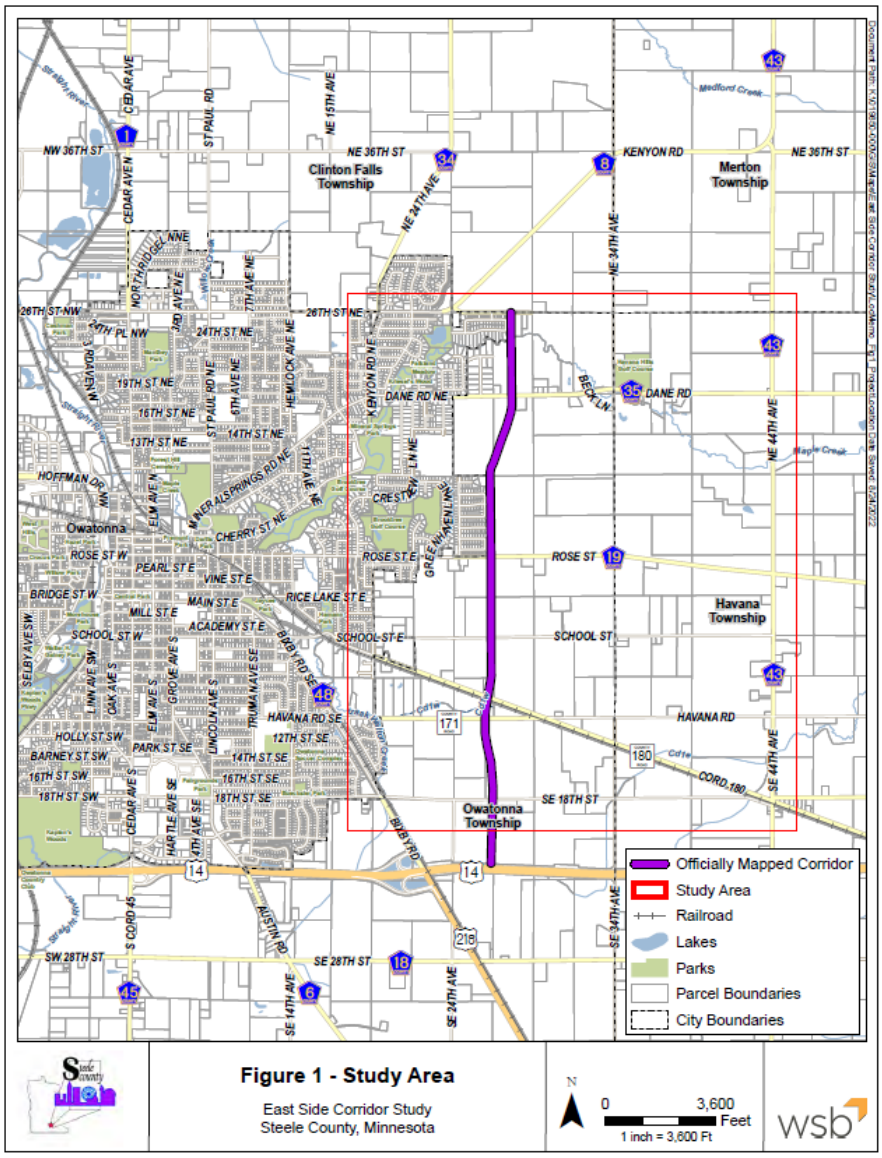
Today, 50 feet of the 150-foot-wide corridor runs through these private, occupied properties. Yet no formal relocation plans, compensation offers, or mitigation strategies have been proposed.

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.

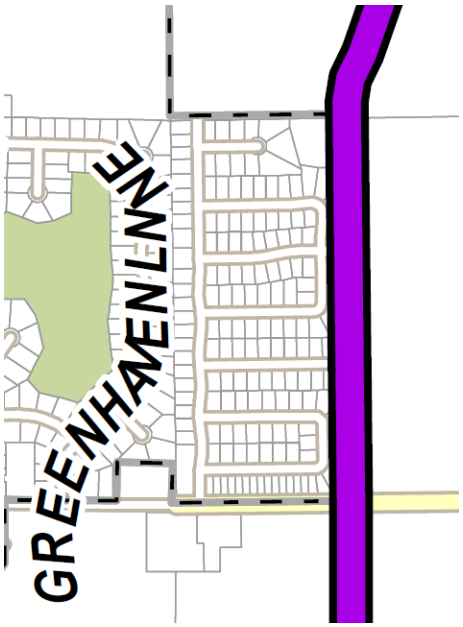
This pattern of omission and misrepresentation undermines the transparency, integrity, and credibility of the entire planning process.

Why This Matters

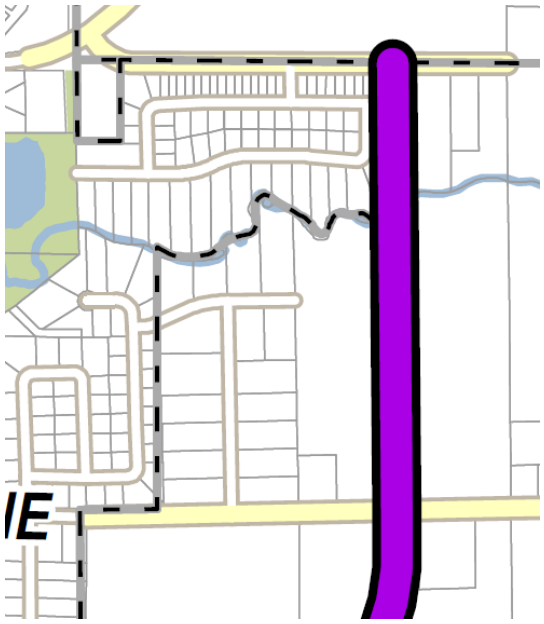
Public agencies are entrusted to act with transparency and prioritize the safety and well-being of residents. In this case:

- 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.

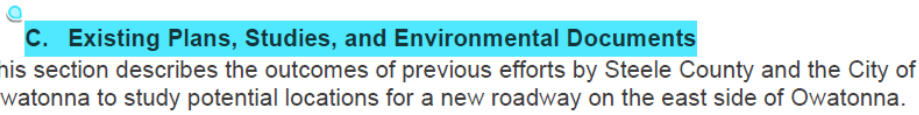
While the corridor still appears on maps, its legitimacy has eroded. Years of abandonment, approved development, and omission of key facts from the Memorandum undermine its legal and ethical standing. Reviving it now risks violating property rights and public trust.

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.



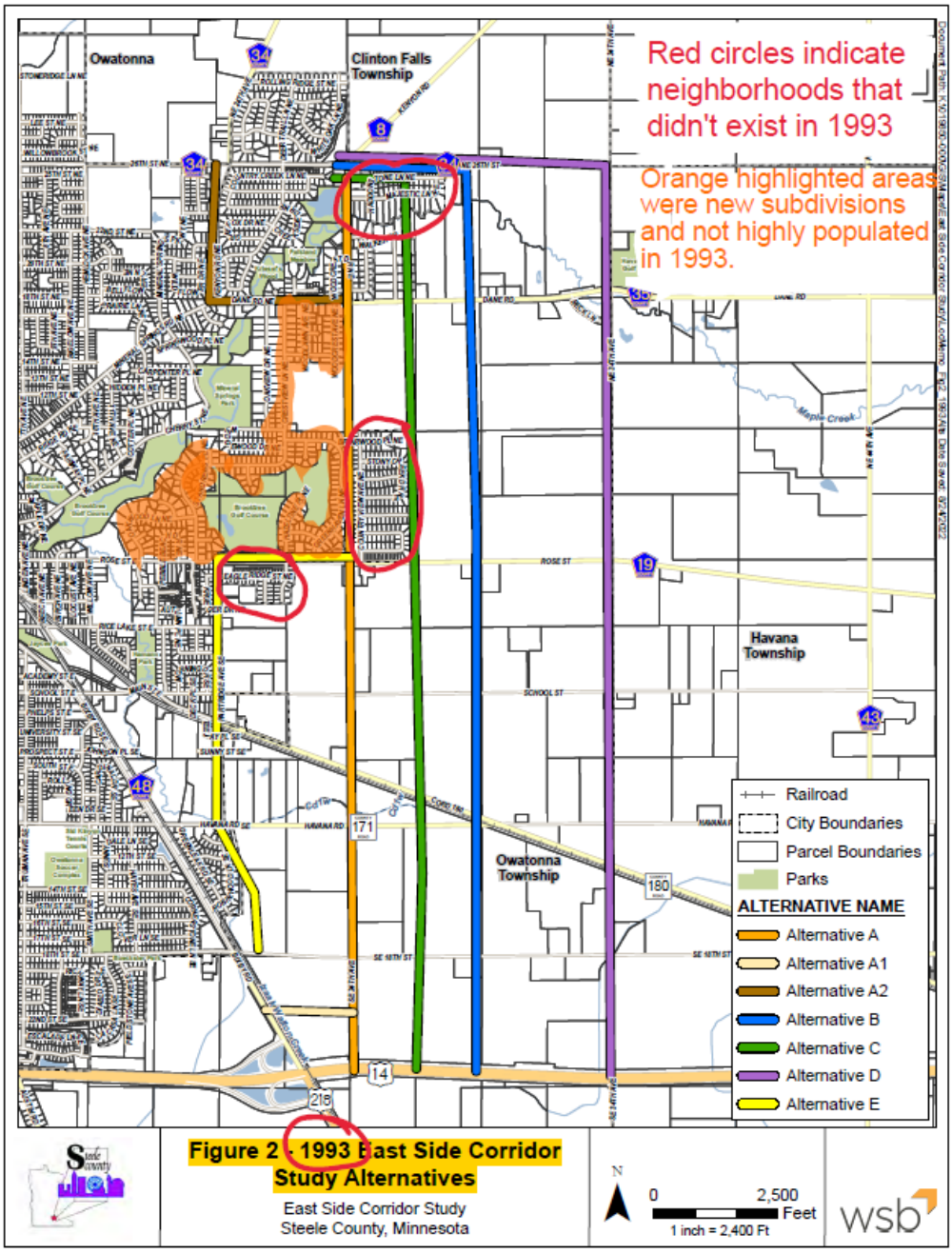
C. Existing Plans, Studies, and Environmental Documents

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

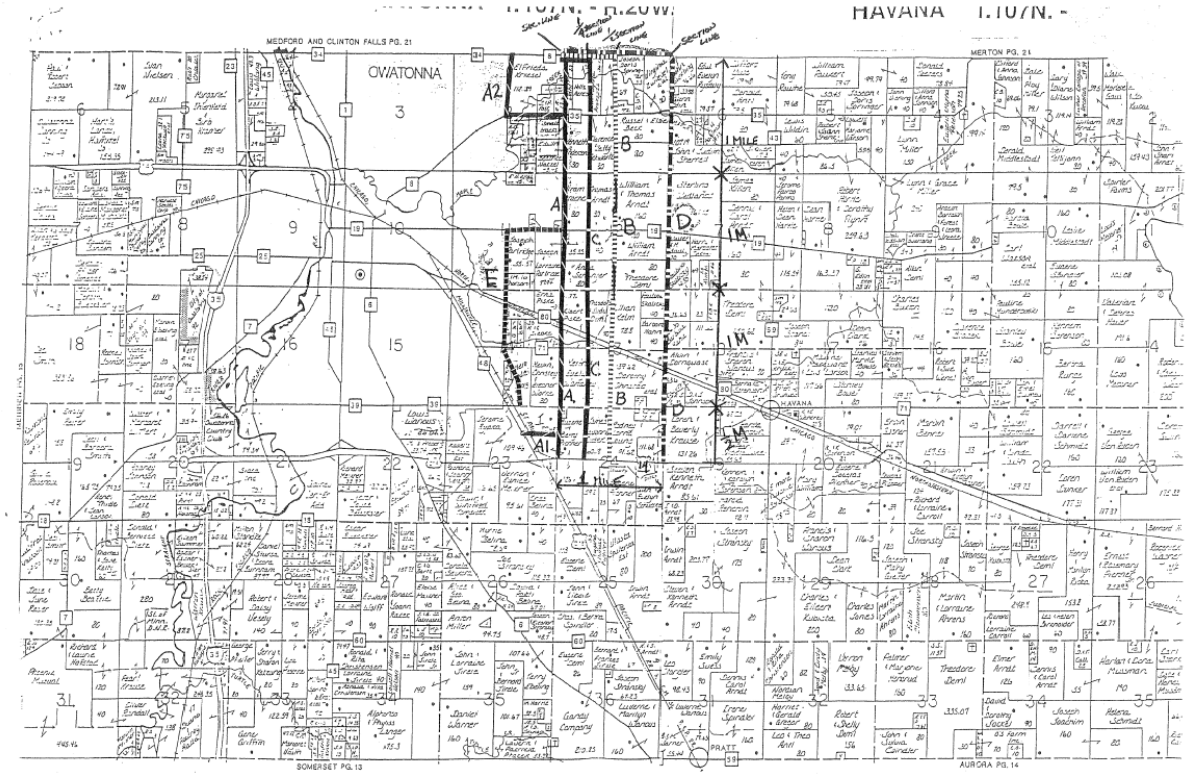


Figure R3: Maps the original 1990s alternatives, all located outside current city limits.

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.

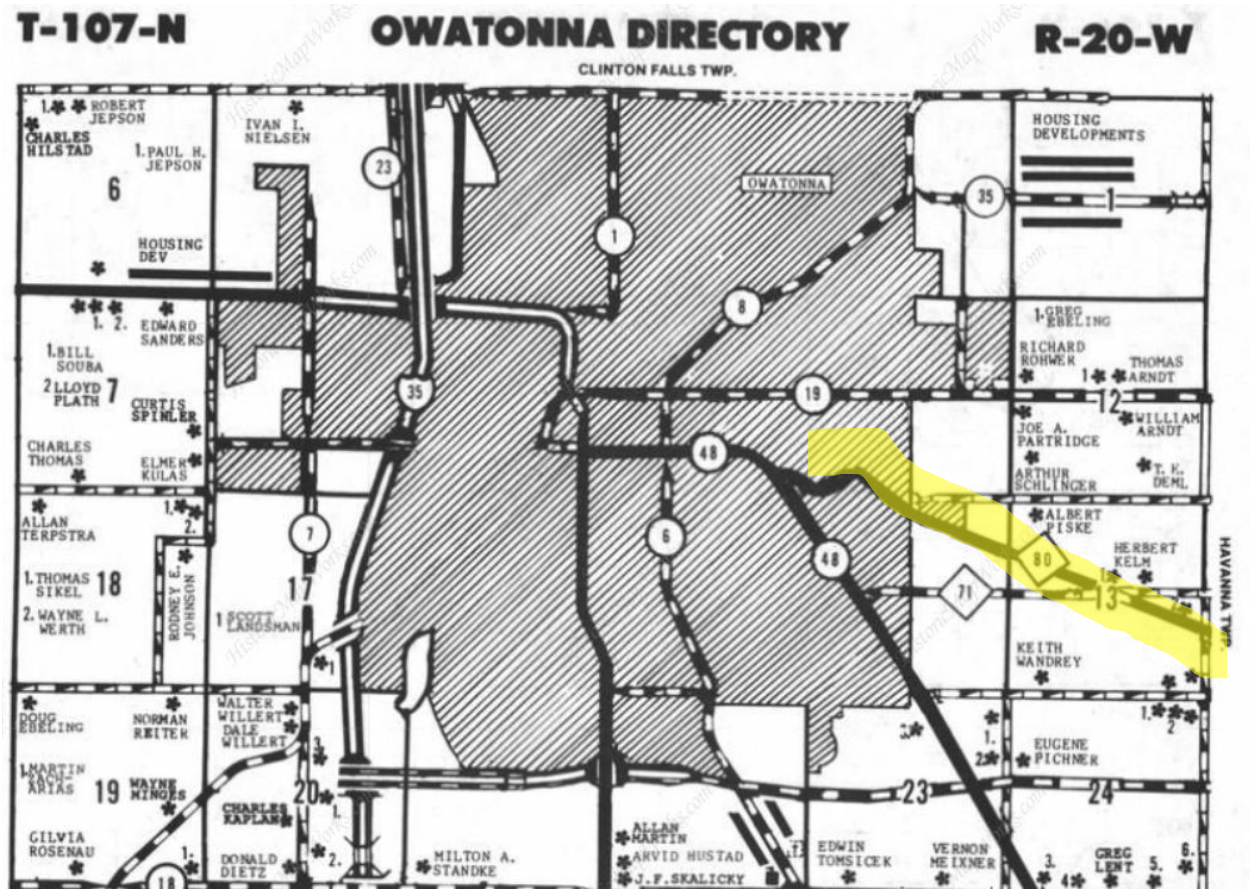


Figure R9 – 1995 Plat Map highlighting County Road 80.

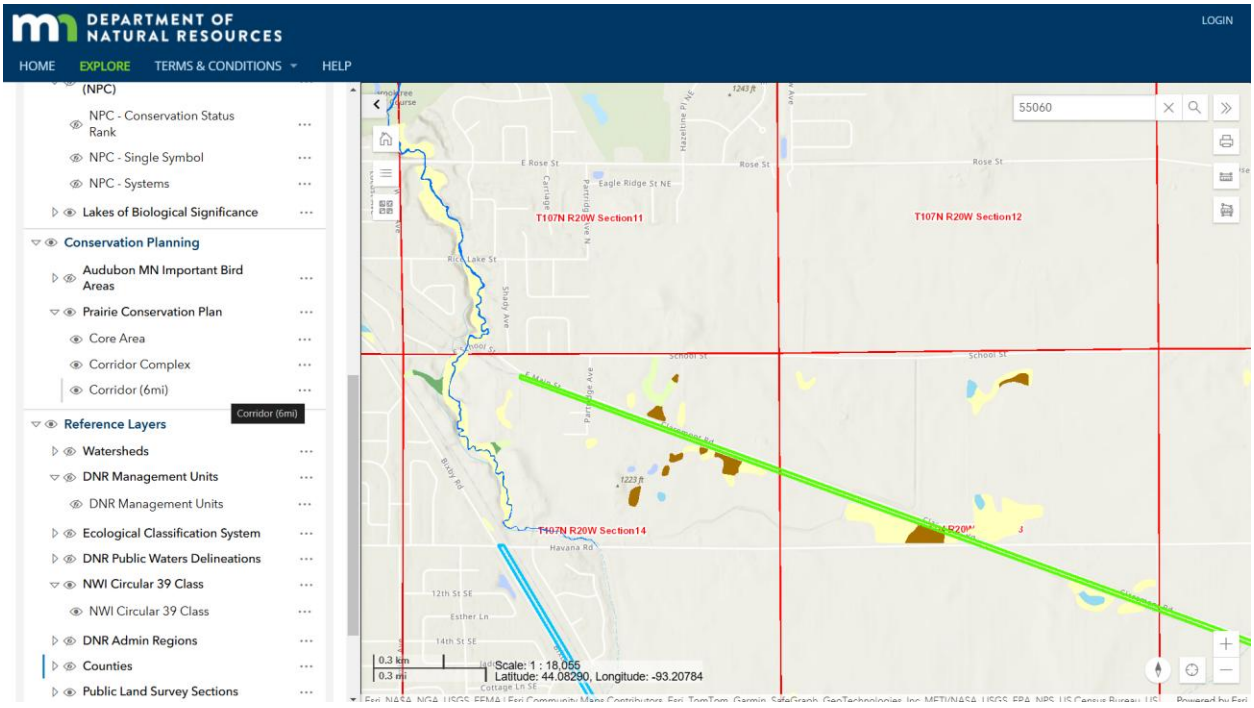


Figure R10 - MN DNR map of prairie wetlands along County Road 180/80.

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.

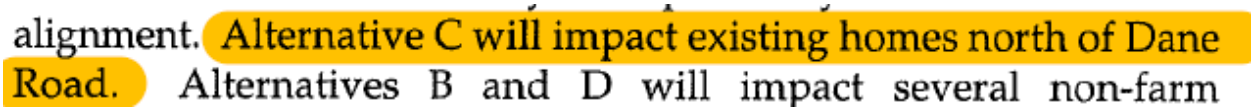

alignment. Alternative C will impact existing homes north of Dane Road. Alternatives B and D will impact several non-farm

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.

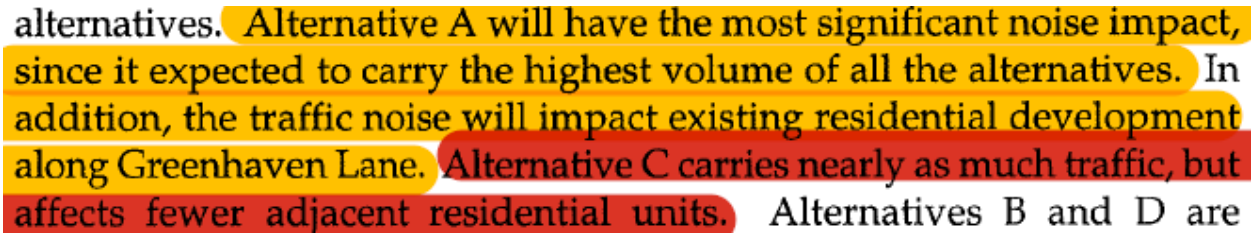

alternatives. Alternative A will have the most significant noise impact, since it expected to carry the highest volume of all the alternatives. In addition, the traffic noise will impact existing residential development along Greenhaven Lane. Alternative C carries nearly as much traffic, but affects 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

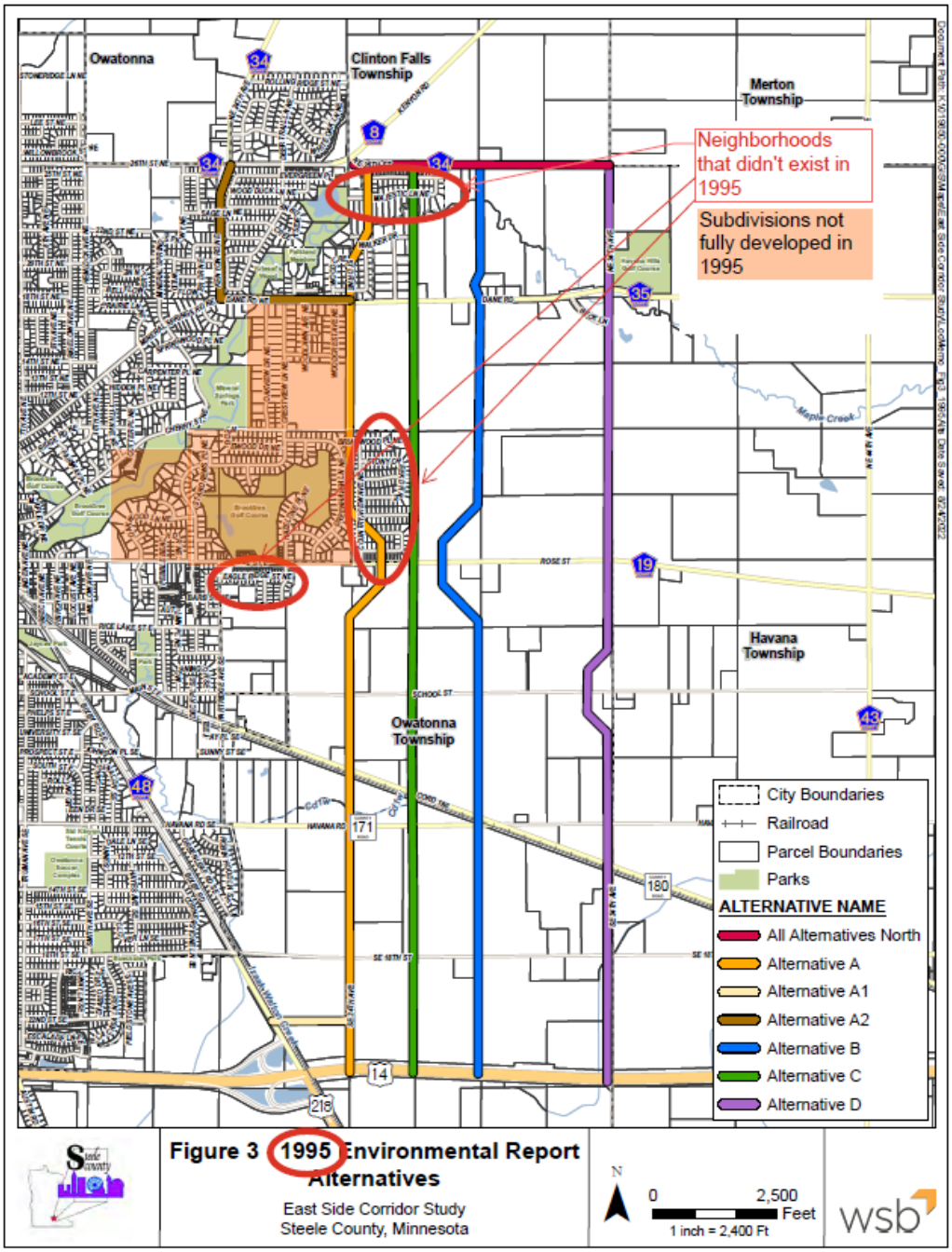
- C Provide a well-defined roadway surface showing continuous horizontal direction and movement;
- C Integrate a landscape plan that is functional and provides a connection in the project corridor;
- C Maple Creek Bridge. This is a key visual resource. The design and construction of the bridge should 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.

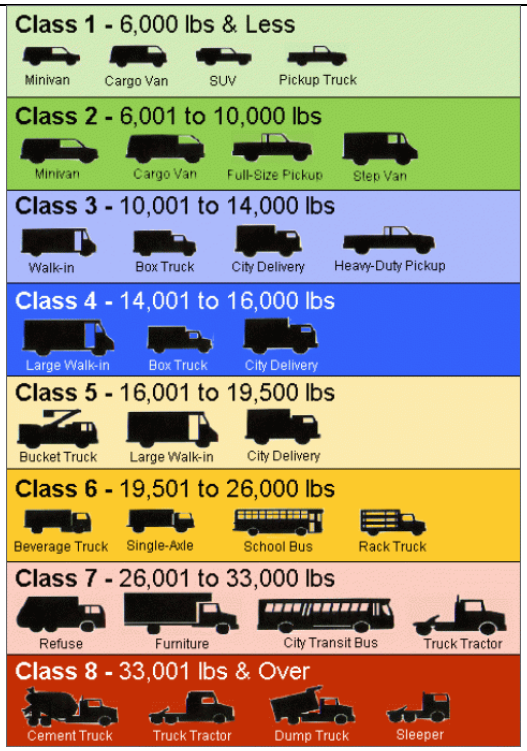


Figure R18 – Vehicle Classifications per the federal Government

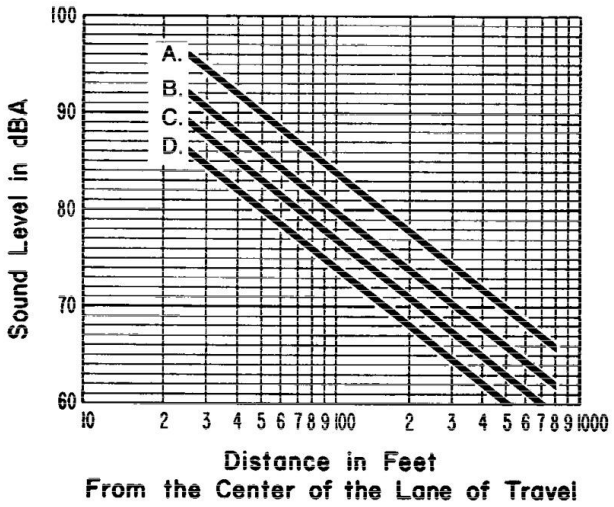


Figure R19 – Noise limits for vehicles over 10,000lbs
https://www.revisor.mn.gov/rules/7030.1040/

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.

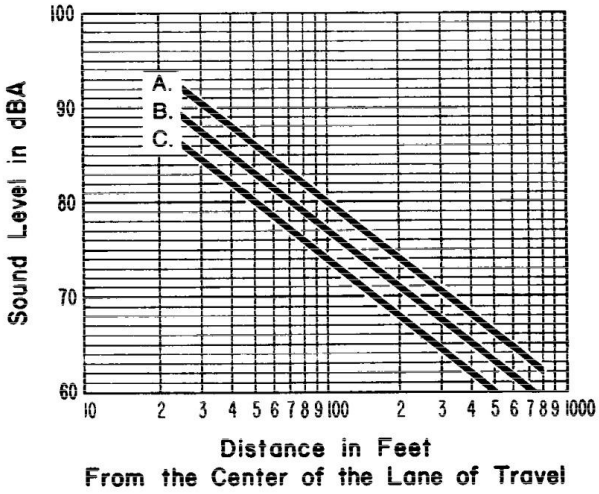


Figure R20 – Noise limits for Motorcycles
https://www.revisor.mn.gov/rules/7030.1050/

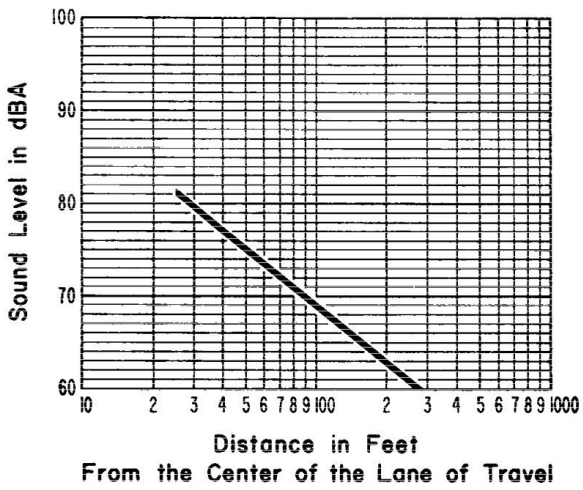


Figure R21 – Noise limits for other vehicles
https://www.revisor.mn.gov/rules/7030.1060/

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).

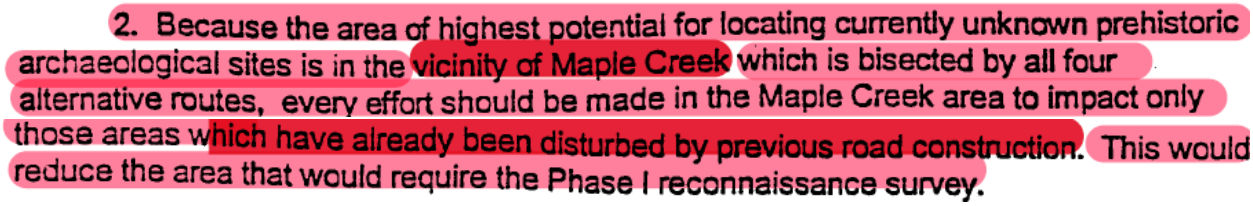

2. Because the area of highest potential for locating currently unknown prehistoric archaeological sites is in the vicinity of Maple Creek which is bisected by all four alternative routes, every effort should be made in the Maple Creek area to impact only those areas which have already been disturbed 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.

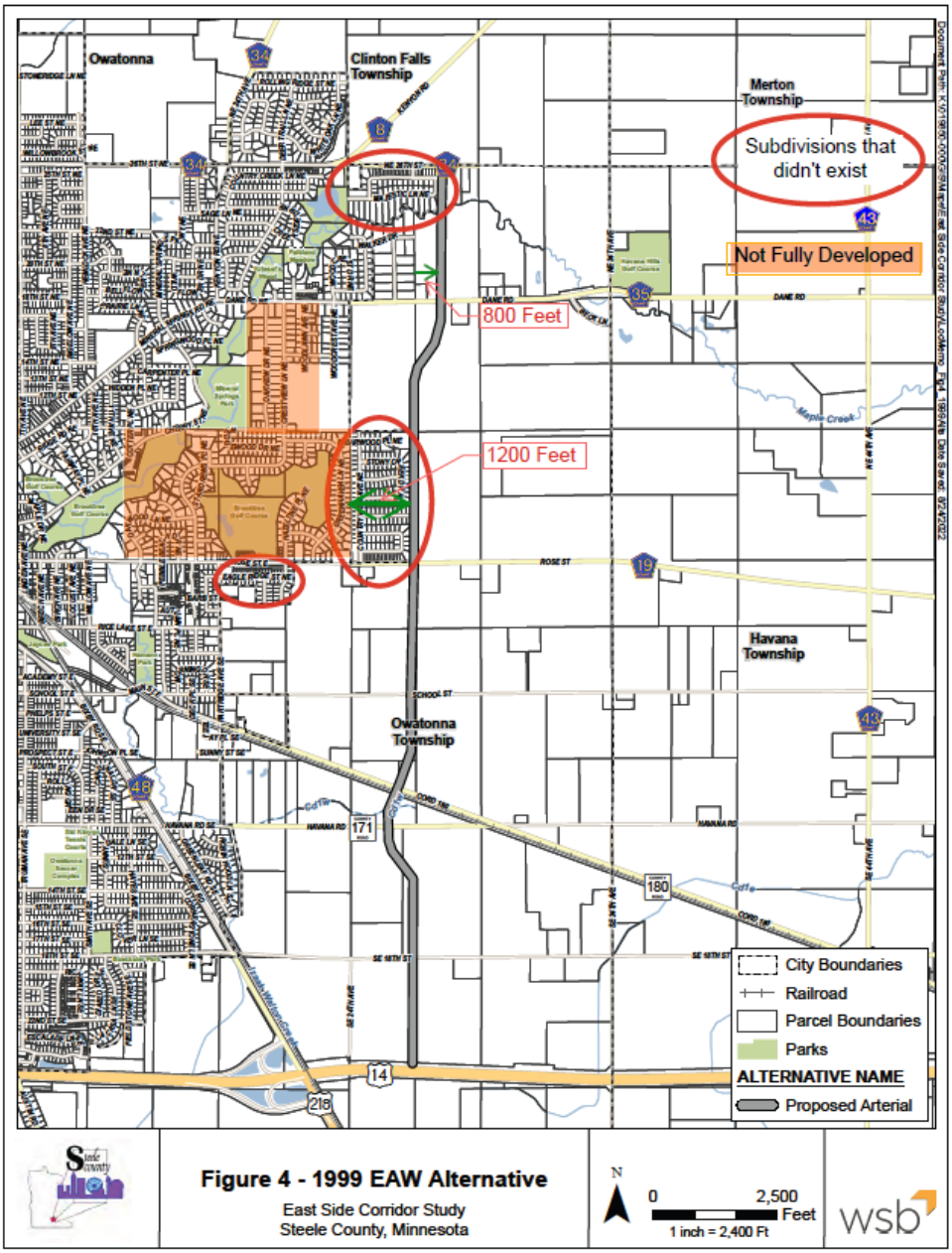
The EAW identified nine key issues, including noise impacts—and proposed a 150-foot right-of-way paired with an 800-foot setback from homes to avoid harm. This reflected a clear strategy of impact avoidance, in line with both environmental and ethical planning practices at the time.

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.

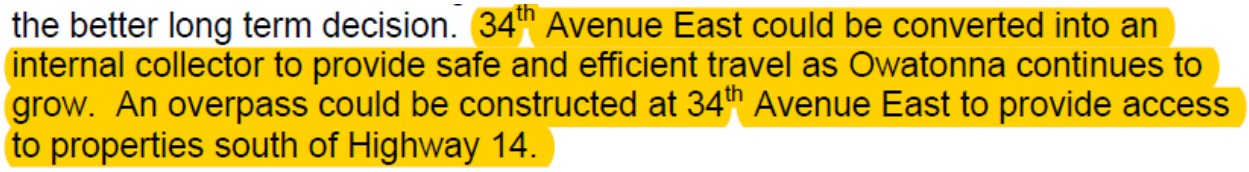
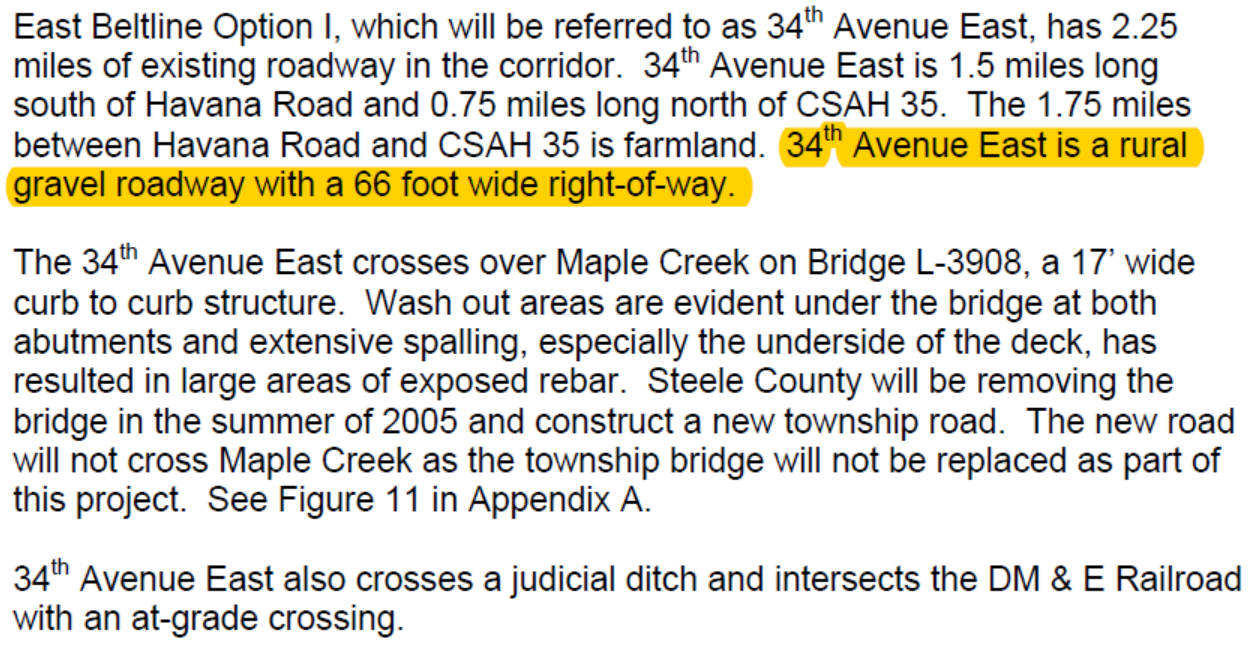

the better long term decision. 34th Avenue East could be converted into an internal collector to provide safe and efficient travel as Owatonna continues to grow. An overpass could be constructed at 34th Avenue East to provide access to properties south of Highway 14.

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).

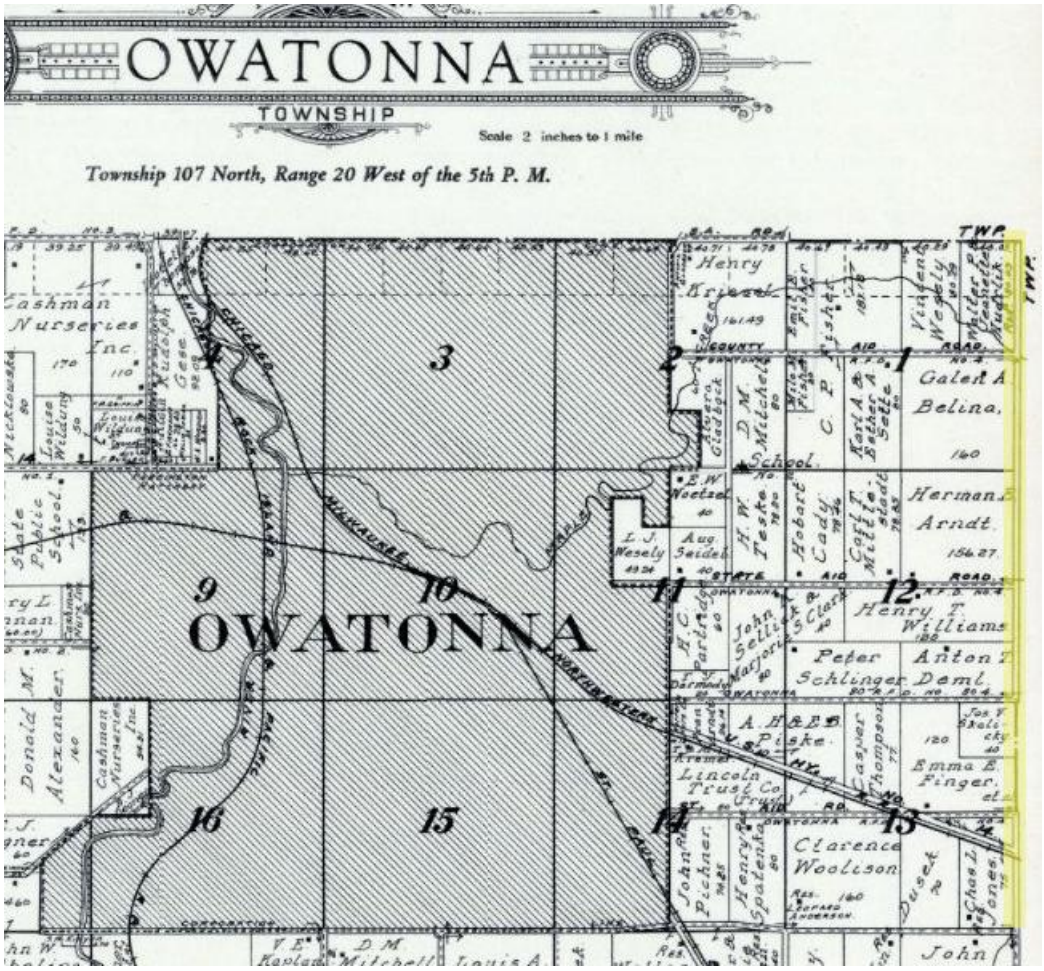


Figure R25 – *1937 Central Atlas Co.* plat of Owatonna Township showing 34th Avenue (Alternative 5).

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.

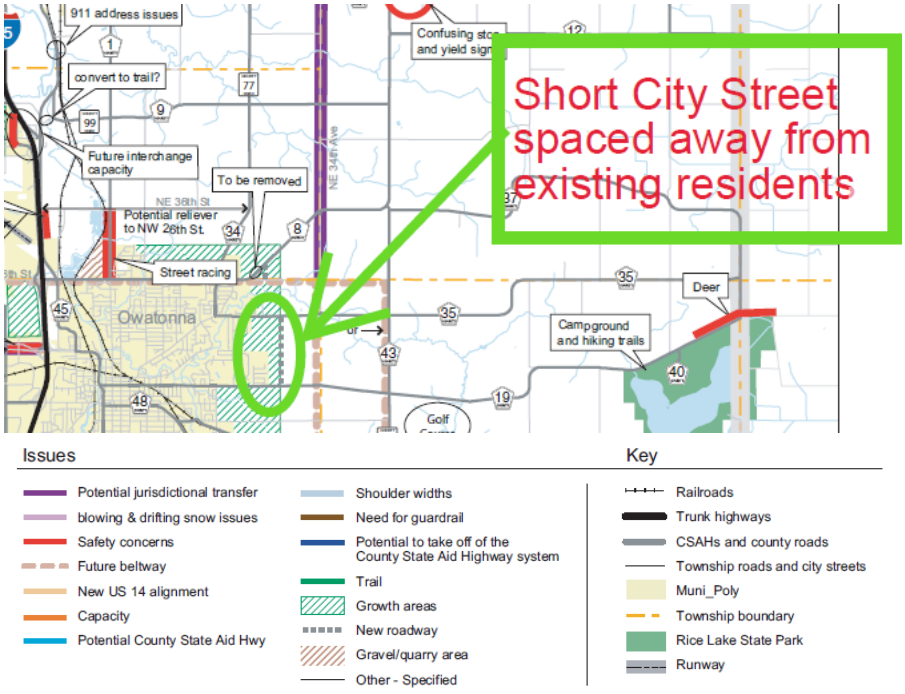


Figure R27 – The *2005–2025 Steele County Transportation Plan* illustrates planned growth between the North Country Subdivision, in its early stages of development, and a shorter proposed roadway.

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.

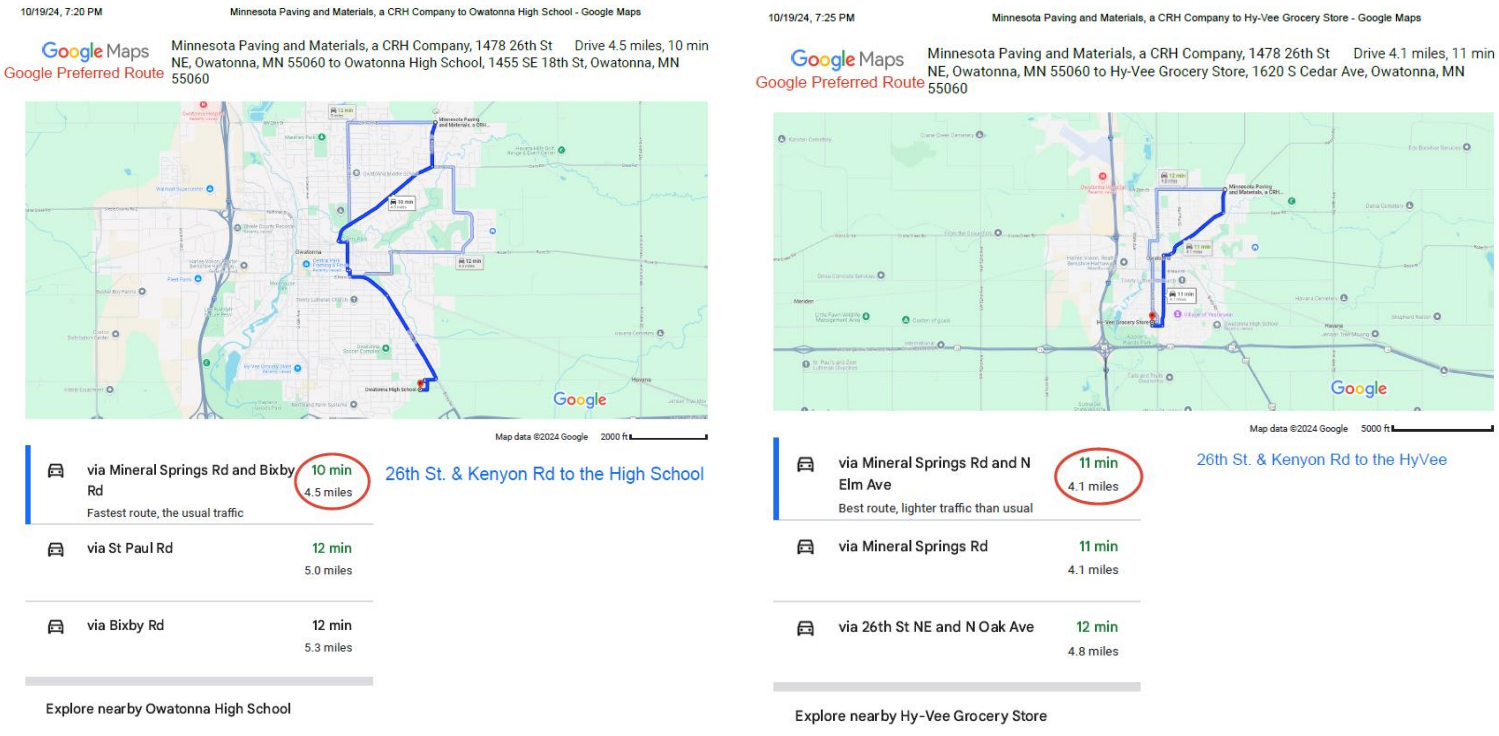


Figure R30 – 26th St. & Kenyon Rd to destination points

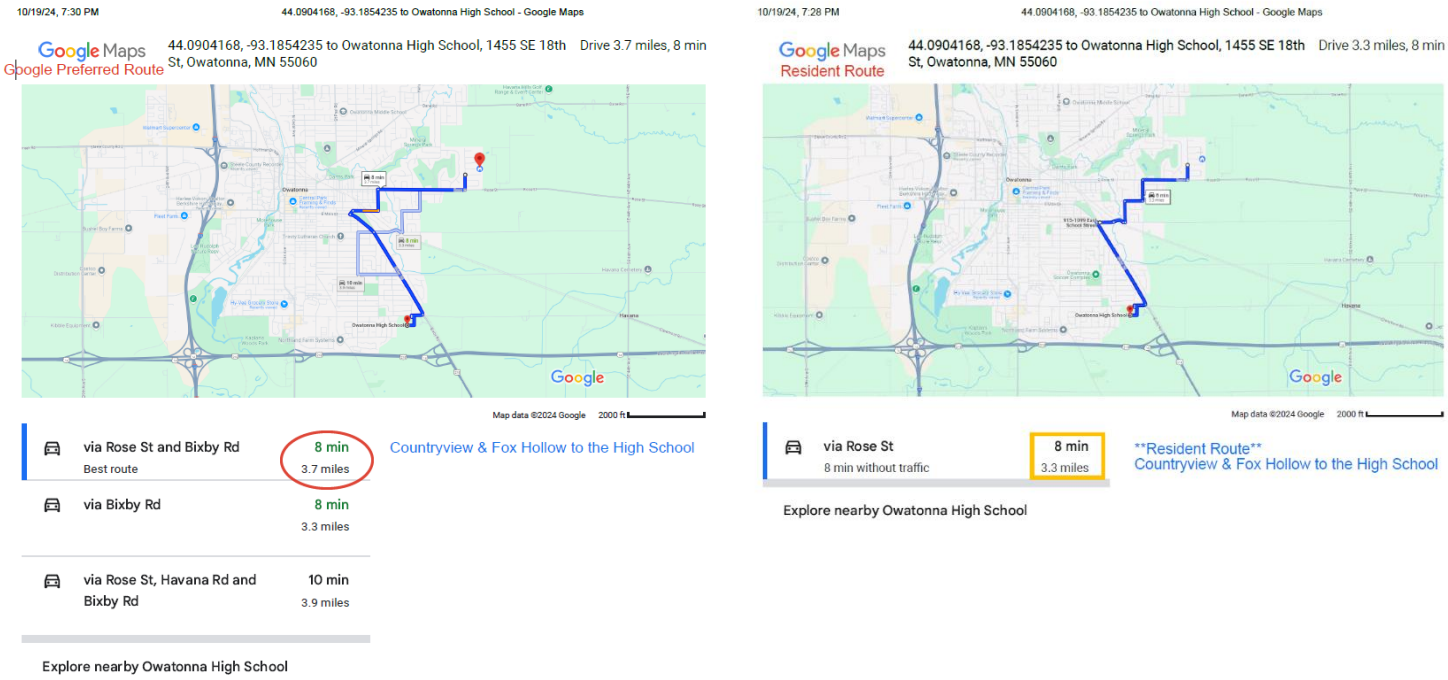


Figure R31 – Countryview & Fox Hollow Ln to the High School Google Recommended Route (left) 3.7 miles and Resident Preferred Route (right) 3.3 miles. Both 8 minutes travel time.

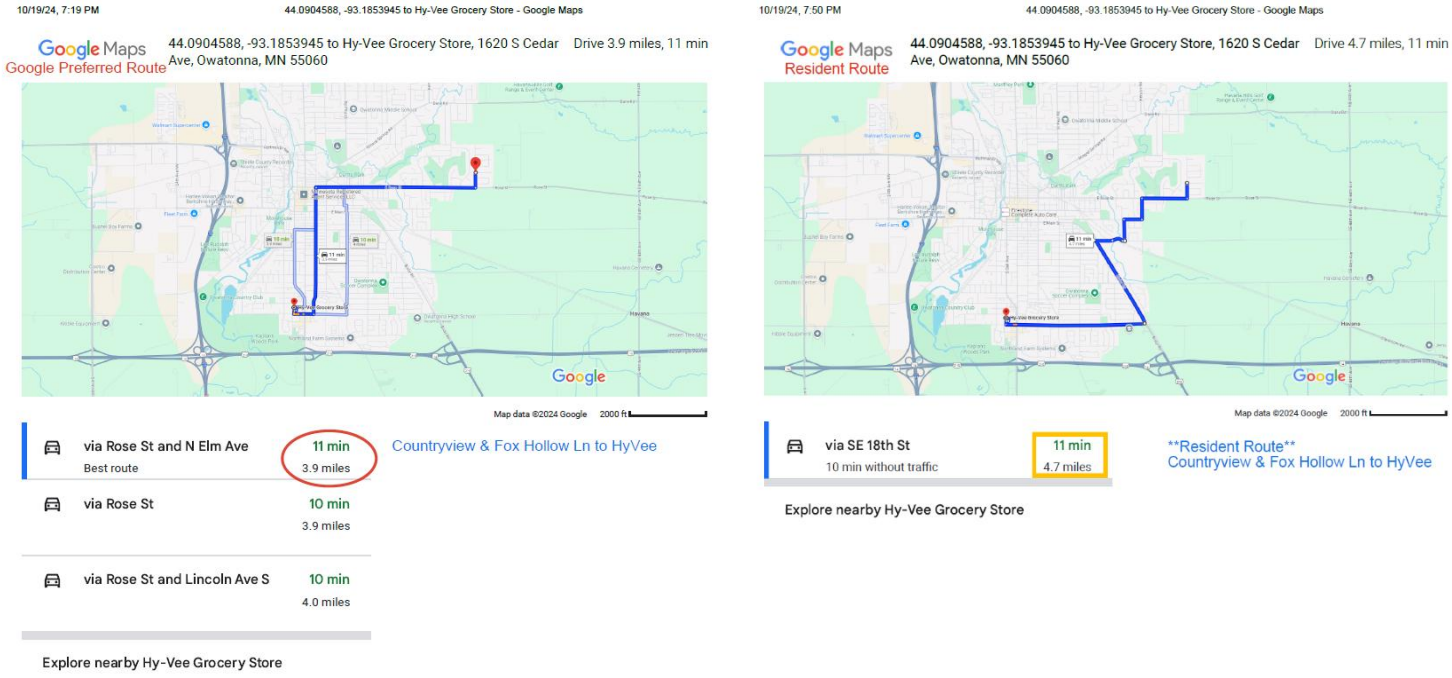


Figure R32 – Countryview & Fox Hollow Ln to Hy-Vee Google Recommended Route (left) 3.9 miles and Resident Preferred Route (right) 4.7 miles. Both 11 minutes travel time.

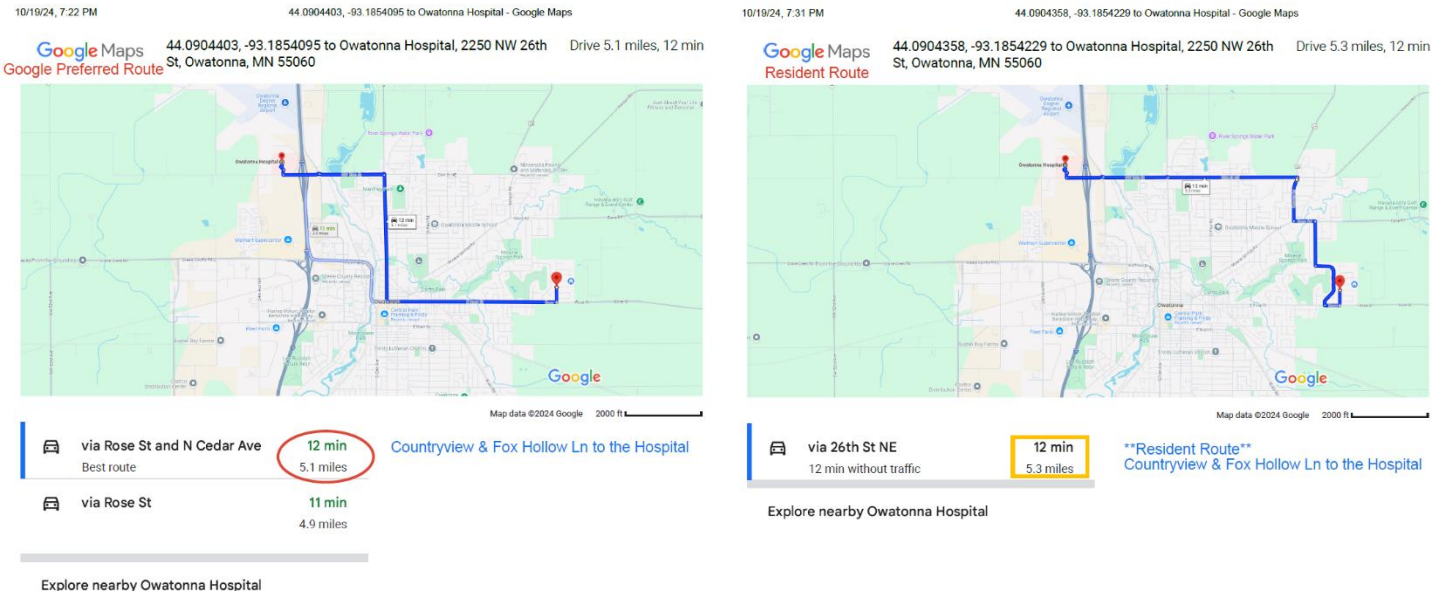


Figure R33 – Countryview & Fox Hollow Ln to the Hospital Google Recommended Route (left) 5.1 miles and Resident Preferred Route (right) 5.3 miles. Both 12 minutes travel time (although resident route is often faster).

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.

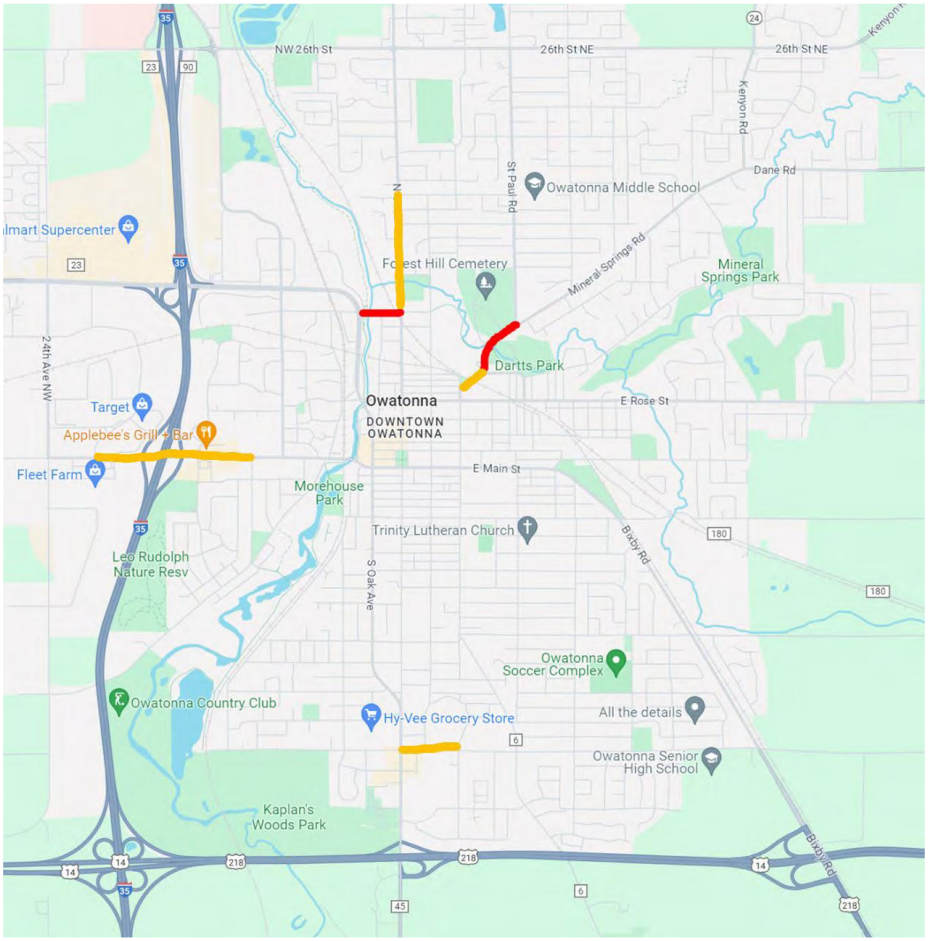
As Owatonna was designed with a spoke-and-wheel road system meant to draw people into the downtown core, the report also fails to address potential economic and logistical consequences of diverting traffic away from downtown—the very heart of the city.

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.