

6.0 DRAFT SECTION 4(F) EVALUATION

DRAFT

Section 4(f) Evaluation

MINNESOTA'S UNION DEPOT

State Project: 91-595-20

Rehabilitation and reuse of Minnesota's Union Depot as a multi-modal transit hub.

City of Saint Paul in County of Ramsey of Minnesota
Sections 5, 6 T 28N, 22W and 32, T29N, 22W

This document is available in alternative formats to individuals with disabilities by calling the Minnesota Relay Service at 1-800-627-3529.



This page is intentionally left blank.

TABLE OF CONTENTS

<u>I.</u>	<u>INTRODUCTION</u>	<u>152</u>
<u>II.</u>	<u>PROPOSED ACTION</u>	<u>153</u>
<u>III.</u>	<u>SECTION 4(F) PROPERTIES</u>	<u>155</u>
<u>IV.</u>	<u>IMPACTS ON SECTION 4(F) PROPERTY</u>	<u>162</u>
	TEMPORARY CONSTRUCTION ACTIVITY IMPACTS	164
<u>V.</u>	<u>AVOIDANCE ALTERNATIVES</u>	<u>166</u>
	NO BUILD	166
	BUILD ALTERNATIVE	166
<u>VI.</u>	<u>MEASURES TO MINIMIZE HARM</u>	<u>168</u>
	SITE DESIGN OPTIONS	168
	MITIGATION MEASURES	169
<u>VII.</u>	<u>COORDINATION</u>	<u>170</u>
	NATIVE AMERICAN CONSULTATION	170
	CONSULTATION WITH THE SHPO AND THE SAINT PAUL HPC	170
	SUMMARY OF ALL FORMAL COORDINATION COMMENTS RECEIVED	171
<u>VIII.</u>	<u>CONCLUSION</u>	<u>173</u>



I. INTRODUCTION

The Section 4(f) legislation as established under the Department of Transportation Act of 1966 (49 USC 303, 23 USC 138) provides protection for publicly owned parks, recreation areas, historic sites, wildlife and/or waterfowl refuges from conversion to a transportation use. The Federal Highway Administration (FHWA) may not approve the use of land from a significant publicly owned park, recreation area, or wildlife and waterfowl refuge, or any significant historic site unless a determination is made that:

- There is no feasible and prudent alternative to the use of land from the property; and
- The action includes all possible planning to minimize harm to the property resulting from such use (23 CFR 771.135).

The purpose of this Section 4(f) Evaluation is to provide the information required by the Secretary of Transportation to make the decision regarding the use of properties protected by Section 4(f) legislation with the concept plan selected in the *Minnesota's Union Depot Environmental Assessment* (the EA for this project).

This Section 4(f) Evaluation describes all identified Section 4(f) properties which are proposed to be “used” with the proposed project, potential impacts on those properties, and possible mitigation measures to minimize impacts. A “use” occurs (1) when land from a Section 4(f) site is acquired for a transportation project, (2) when there is an occupancy of land that is adverse in terms of the statute's preservationist purposes, or (3) when the proximity impacts of the transportation project on the Section 4(f) sites, without acquisition of land, are so great that the purposes for which the Section 4(f) site exists are substantially impaired (normally referred to as a constructive use).

The Section 4(f) process requires that any impacts from use of a park, recreation area, historic site, wildlife or waterfowl refuge for transportation purposes be evaluated in context with the proposed transportation activity. An inventory of these types of properties was completed based on a review of the preliminary design for the project. Figure 1 shows the regional location of the project; Figure 2 shows the project location on a USGS topographic map; Figure 3 shows the Section 4(f) resources identified in the area of the project.

As documented in the EA, and shown on Figure 3, many Section 4(f) resources exist in the vicinity of the project. These resources include parks, recreation areas, wildlife or waterfowl refuges and historical properties. With the exception of the Union Depot, these properties do not have a Section 4(f) use.

II. PROPOSED ACTION

The proposed action for the Minnesota's Union Depot project is to re-establish the Depot's former function as a passenger transportation terminal. Through new construction and rehabilitation of existing facilities, the railroad access, concourse and waiting room would be utilized to provide transit passenger services (including inter-modal transfer, ticketing, baggage, and other auxiliary uses). In order to reuse the Union Depot as a multi-modal transit hub as described, the Ramsey County Regional Rail Authority (RCRRA) is proposing several actions the potential impacts of which are identified in this document.

The proposed action includes the following components:

- Acquisition of the property from the United States Postal Service (USPS) and Saint Paul Housing and Redevelopment Authority (HRA).
- Demolish the 1978 USPS Annex to provide increased space on the train deck for vehicle operations. This loading dock facility is currently located on the western edge of the train deck adjacent to Sibley Street.
- Reestablish the passenger rail tracks and platforms for use by Amtrak.
- Reconstruct the pedestrian vertical circulation with stairs, elevators and escalators between the waiting room and the passenger platforms on the train deck.
- Construct a bus transfer island for use by both the regional transit provider (Metro Transit) and inter-city (Greyhound, Jefferson Line) buses.
- Rehabilitate the historic concourse and waiting room.
- Accommodate taxi service on the train deck.
- Modify the vehicular ramp to the train deck from Kellogg Boulevard and Broadway Street. Vehicles (including all bus service) would access the upper (train deck) level on a newly-constructed ramp. This action would include removing approximately 44,000 cubic yards of fill from the train deck and filling in/building a structure over the southern portion of the existing ramp.
- Reconfigure the parking layout on the existing deck east of Broadway Street.
- Construct a 15- to 20-foot-wide bicycle/pedestrian facility in the under track level.
- Build a pedestrian and bicycle way along Kellogg Boulevard.
- Remove the northwestern portion of the train deck to provide adequate headroom over a portion of the pedestrian and bicycle way.
- Relocate passenger service from the Midway Amtrak Station and Greyhound Bus Station.
- Create ADA-accessible routes through the site.



In addition, the RCRRRA is also exploring the possibility of obtaining and utilizing a pedestrian easement through the “head house” to connect the future Central Corridor Light Rail Station with other transportation modes within the Union Depot; however, an easement is not necessary for a successful project. Also, the Central Corridor Light Rail Transit (LRT) line, which is currently in Preliminary Engineering, may be extended to include a station on the train deck under the waiting room. For the purposes of this Section 4(f) Evaluation, these components are considered part of the project and are included as possible impacts to the Section 4(f) properties.

III. SECTION 4(f) PROPERTIES

MAP OF SECTION 4(f) PROPERTIES

Figure 3 shows a map of all of the Section 4(f) properties in the vicinity of the Union Depot project; with the exception of the Union Depot, these properties do not have a Section 4(f) use..

Parks, Wildlife and Water Fowl Refuges, and Recreation Areas

Bruce Vento Nature Sanctuary

The Bruce Vento Nature Sanctuary is a 27-acre nature sanctuary located east of the Union Depot site owned by the City of St. Paul. There will be no Section 4(f) use of this property.

Tot Lot

The Tot Lot is a small park (less than one acre) located on the southwest corner of the intersection of Fourth Street and Sibley Street. The park is owned by the Saint Paul Housing and Redevelopment Authority. There will no Section 4(f) use of this property.

Kellogg Mall Park

Located in downtown Saint Paul, Kellogg Mall Park features two fountains, an arbor, and electrical outlets. This park offers unimpeded views of the Mississippi River. Kellogg Mall Park is owned by the City of St. Paul. There will be no Section 4(f) use of this property.

Sam Morgan Regional Trail (Mississippi River Trail)

The Sam Morgan Regional Trail is a bicycle trail along the north side of the Mississippi River. It is part of a large national network of bicycle facilities along the Mississippi River connecting Lake Itasca with the Gulf of Mexico. The portion of trail by the Union Depot is maintained by the City of Saint Paul. There will be no Section 4(f) use of this property.

Historic Properties

One historic district, seven individual buildings and one historic railroad corridor have been identified as historic properties (and therefore Section 4(f) resources) that are located in the vicinity of the project:

Saint Paul Lowertown Heritage Preservation District

The Saint Paul Lowertown Heritage Preservation District (EA Figure 4.1.11-1) is a locally designated heritage preservation district. Table 1 summarizes the extant properties that contribute to the NRHP Lowertown Historic District. There will be no Section 4(f) use of this district (with the exception of the Union Depot, discussed below).



TABLE 1
PROPERTIES LOCATED WITHIN THE LOWERTOWN HISTORIC DISTRICT

MnSHPO No.	Name	Address	Description
*RA-SPC-0388	Tighe Building	364-382 Broadway St.	Warehouse
*RA-SPC-0389	Allen Building Annex	417 Broadway St.	Warehouse
*RA-SPC-3008	Northern Pacific Railway Warehouse	308 Prince St.	Warehouse
*RA-SPC-3351	Smith (Mears) Park	Block between Sibley & Wacouta, 5 th & 6 th Streets	Park
*RA-SPC-3352	Gordon & Ferguson Building	331-341 Sibley St.	Factory
*RA-SPC-3353	John Wann Building	350-365 Sibley St.	Commercial Building
*RA-SPC-3355	Noyes Brothers & Cutler Building	400 Sibley St./219-225 6 th St. E.	Commercial Building
*RA-SPC-4519	Depot Bar	241 Kellogg Blvd. E.	Bar
*RA-SPC-4520	Weyerhaeuser-Denkman Building	255 Kellogg Blvd. E	Warehouse
*RA-SPC-4522	James J. Hill Office Building	281-299 Kellogg Blvd. E.	Commercial Building
*RA-SPC-4523	Griggs & Foster's Farwell, Ozmun & Kirk Building	319 Kellogg Blvd. E./300 Broadway St.	Wholesale House
*RA-SPC-4524	Samco Sportswear Company	205-213 4 th St. E.	Building Complex
*RA-SPC-5225	St. Paul Union Depot**	214 4 th St. E.	Railroad Depot
*RA-SPC-5226	Michaud Brothers Building	249-253 4 th St. E.	Commercial Building
*RA-SPC-5227	Hackett Block	262-280 4 th St. E.	Commercial Building
*RA-SPC-5228	Chicago, St. Paul Minneapolis & Omaha Office Building	275 4 th St. E.	Office Building
*RA-SPC-5229	St. Paul Rubber Company	300 4 th St. E.	Warehouse
*RA-SPC-5246	Railroad & Bank Building	176 5 th St. E.	Office Building
*RA-SPC-5248	Fairbanks-Morse Company	220 5 th St. E.	Manufacturing Facility

MnSHPO No.	Name	Address	Description
*RA-SPC-5249	Powers Dry Goods Company	230-236 5 th St. E.	Warehouse
*RA-SPC-5250	Conrad Gotzian Shoe Company	242 5 th St. E.	Warehouse
*RA-SPC-5251	Mike and Vic's Café	258-260 5 th St. E.	Commercial Building
*RA-SPC-5252	Rayette Building	261-279 5 th St. E.	Commercial Building
*RA-SPC-5253	Crane Building	281-287 5 th St. E.	Warehouse
*RA-SPC-5271	Konantz Saddlery Company/Railroad	227-231 6 th St. E.	Factory
*RA-SPC-5272	Koehler & Hinrichs	235-237 6 th St. E.	Commercial Building
*RA-SPC-5273	George Somers Company	245 6 th St. E.	Commercial Building
*RA-SPC-5274	Seestedt Carpets	282 6 th St. E.	Commercial Building
*RA-SPC-5275	J. H. Allen Building	287 6 th St. E.	Warehouse
*RA-SPC-5461	Gotzian Building	352 Wacouta St.	Warehouse
*RA-SPC-5462	Finch, Van Slyck & McConville Dry Goods Company	366 Wacouta St.	Commercial Building
RA-SPC-5364	J. H. Weed Building	208-212 7 th St. E.	Commercial Building
RA-SPC-5365	Constans Block	224-240 7 th St. E.	Hotel
RA-SPC-5366	Walterstroff and Montz Building	216-220 7 th St. E.	Commercial Building
RA-SPC-5369	B & M Furniture (western building)	252 7 th St. E.	Commercial Building
RA-SPC-5370	B & M Furniture (eastern building)	256 7 th St. E.	Commercial Building
RA-SPC-5371	O'Connor Building	264-266 7 th St. E.	Commercial Building
RA-SPC-5463	Engine Company No. 2	412 Wacouta St.	Fire Station
RA-SPC-5464	Boston and Northwest Realty Company Wacouta St. Warehouse	413 Wacouta St.	Warehouse

*Within project APE

**Also individually listed in the NRHP



Lowertown National Register Historic District

The Lowertown National Register Historic District (1983) is also within the locally designated Saint Paul Lowertown Heritage Preservation District (EA Figure 4.1.11-1). Table 1 identifies properties included in this historic district. There will be no Section 4(f) use of this district (with the exception of the Union Depot, discussed below).

Merchants National Bank Building

The Merchants National Bank Building is bank and office building listed on the NRHP. It is located at 366-368 Jackson Street N. There will be no Section 4(f) use of this property.

Pioneer and Endicott Complex

The Pioneer and Endicott Complex is a series of office buildings listed on the NRHP, located at 141 Fourth Street E and 350 Robert Street N. There will be no Section 4(f) use of this property.

Manhattan Building

The Manhattan Building is an office building listed on the NRHP. It is located at 360 Robert Street N. There will be no Section 4(f) use of this property.

Farwell, Ozmun, Kirk & Company

The Farwell, Ozmun, Kirk & Company is an warehouse located at 150-160 Kellogg Boulevard E that has been recommend eligible for inclusion as a NRHP and is pending SHPO approval. There will be no Section 4(f) use of this property.

United States Post Office – Custom House

The United States Post Office – Custom House located at 180 Kellogg Boulevard E has been recommended for inclusion as a NRHP and is pending SHPO approval. There will be no Section 4(f) use of this property.

Endicott Arcade Addition

The Endicott Arcade Addition is a commercial building that has been recommended for inclusion as a NRHP and is pending SHPO approval. It is located at 142 East Fifth Street. There will be no Section 4(f) use of this property.

Chicago Milwaukee and Saint Paul Railway Company Railroad

The Chicago Milwaukee and Saint Paul Railway Company Railroad is the railroad corridor that runs along the southern edge of the Union Depot. The railroad corridor has been recommended eligible for inclusion as a NRHP and is pending SHPO approval. There will be no Section 4(f) use of this property.

Union Depot

The Saint Paul Union Depot is a listed NRHP property (1974) and is located within the Lowertown National Register Historic District (1983). It is also within the locally designated Saint Paul Lowertown Heritage Preservation District (EA Figure 4.1.11-1). The Union Depot Elevated Rail Yards has been recommended eligible for inclusion as a NRHP and is pending SHPO approval. The rehabilitation and reuse of Minnesota's Union Depot will have a Section

4(f) use. As a result, this Draft Section 4(f) Evaluation was completed with regard to the historic properties.

The remainder of this Section 4(f) evaluation will focus on the Union Depot property.

SIZE AND LOCATION

The Union Depot site is approximately 28.8 acres in size, located between Kellogg Boulevard, Shepard Road, Sibley Street, and a railroad wye in downtown Saint Paul, Minnesota (Figure 2).

OWNERSHIP AND TYPE OF SECTION 4(F) PROPERTY

The Union Depot site currently has multiple property owners:

- RCRRA owns the property along the south side of Kellogg Boulevard, east of Broadway Street, north of the elevated rail yard and west of the railroad tracks. This property is approximately 5.4 acres.
- The United States Postal Service owns the property along the south side of Kellogg Boulevard between Sibley Street and Broadway Street, north of the railroad tracks. This includes the Union Depot concourse, waiting room, and elevated rail yard. This property is approximately 9.8 acres.
- The Saint Paul HRA owns the elevated rail yard east of Broadway. This property is approximately 13.6 acres.
- Ramsey County property records show that the Union Depot head house is 59 separate parcels, 39 of which are residential condominiums/apartments. JAS Apartments, Inc. owns many of the units with many other individuals owning the balance of the units. The property also has 17 commercial/retail parcels. The other parcels include the parking garage (two parcels) and courtyard.

FUNCTION OF PROPERTY AND AVAILABLE ACTIVITIES

Union Depot - The upper deck of the Union Depot property is currently used as a mail transfer facility and is closed to public use. The lower level of the Union Depot building is currently used for public parking.

DESCRIPTION AND LOCATION OF ALL EXISTING AND PLANNED FACILITIES

Union Depot - Existing facilities on the project site are dedicated to mail transfer operations. External access and interior space programming is designed to accommodate loading and unloading mail from trucks and associated mail handling facilities. Private parking is also offered.

Planned facilities in the rehabilitated Union Depot include a comprehensive range of facilities inherent in a multi-modal transit hub. Such facilities include ticketing and baggage handling facilities, transit vehicle driver convenience facilities, taxi pick-up and drop-off areas, bicycle storage and bicycle rider convenience facilities, pedestrian and bicycle access, and parking and pick-up/drop-off of passengers from personal automobiles. Figure 4 shows a conceptual site plan of the project.



ACCESS

Vehicle access is currently from Kellogg Avenue. Pedestrian access is only available in the loading dock area.

RELATIONSHIP TO OTHER SIMILARLY USED LANDS IN THE VICINITY

The Union Depot building is located in an area of Saint Paul (Lowertown) that retains a commercial character dating back to the 1840s, and shows strong railroad influence dating to the introduction of railroads in 1862. At that time, Lowertown developed into a railroad hub characterized by railroad infrastructure and formed the foundation for St. Paul's economy, lasting well into the twentieth century. As a testament to the importance of the railroading to the city, a plethora of railroad-related structures were located and still remain within Lowertown, including the Union Depot, the James J. Hill Office Building (281-299 East Kellogg Boulevard) and the Chicago St. Paul Minneapolis & Omaha Office (275 East Fourth Street). Many buildings of Lowertown today are constructed of brick because wood structures were destroyed in a series of fires. These buildings, including the Union Depot, form an intact concentration of late nineteenth and early twentieth century commercial buildings in a variety of architectural styles.

Indicative of its current role as a distribution center, the operation of trucks loading and unloading mail and boxes at the Union Depot is similar to other warehouse type commercial uses in the area. Surface parking facilities provided on the train deck are consistent with uses of land in the area. Proposed use as a transit hub is consistent with the adjacent land uses – railroad lines, package distribution and passenger travel.

APPLICABLE CLAUSES AFFECTING THE OWNERSHIP

Union Depot - The known applicable clauses and covenants are described in the Agreement for Purchase of the Saint Paul Main Post Office/P&DC and in the Environmental Assessment of the Twin Cities Consolidation Project Eagan, St. Paul, and Minneapolis, Minnesota prepared by the USPS⁷.

UNUSUAL CHARACTERISTICS REDUCING OR ENHANCING THE VALUE OF THE PROPERTY

Union Depot - The Union Depot's central location, high quality construction and design, and historical value enhance the value of the property. Close proximity to the city's highest employment concentration and close adjacency to regional rail and pedestrian/bicycle corridors enables the Union Depot to serve as the ideal transfer point between several transportation modes. The original design of the depot and the successful handling of the requirements to expand the operation on an existing site, to work out issues with changes in grade, and to resolve ways to handle high volumes of passengers, mail, and packages resulted in an engineering achievement as well as an architectural one. The NHRP nominating form accurately described the Union Depot as "a landmark of westward rail expansion and a symbol of the vast railroading

⁷ U.S. Postal Service, August 2007. Environmental Assessment Twin Cities Consolidation Project Eagan, St. Paul, and Minneapolis, Minnesota, USPS Project: Q82823. Arlington, VA.



empire established in Saint Paul by James J. Hill” and “signifies the importance that railroad transportation played in the early growth and expansion of Saint Paul and the Northwest.”



IV. IMPACTS ON SECTION 4(f) PROPERTY

The Union Depot site will experience impacts from the project – which is to rehabilitate the site as a multi-modal transit hub. Beyond the temporary construction impacts on the Union Depot, the project is expected to have additional effects on the Section 4(f) resource through impacts on its appearance, from changes to the vehicular traffic/parking/access in the area, from pedestrian access, from bicycle circulation, and from physical alteration of the structure.

VISUAL IMPACTS

The concourse and waiting room currently have the appearance of a boarded-up and abandoned building. The elevated rail yard is perceived as a two-story motor vehicle parking structure. The re-use of the Union Depot would reinstate the visual character of a property being used for transportation purposes, as well as introduce some new structural elements. This project would not impact views of or from the head house portion of the Union Depot complex. Views of the waiting room and concourse from the east, north, and south would be altered with the addition of new exterior vestibules and changes to the elevated rail yard: a new ramp, new track, new train sheds, and rehabilitated vehicle parking areas.

VEHICLE TRAFFIC IMPACTS

The elimination of USPS operations from the Union Depot would eliminate approximately 550 daily truck trips and 1,960 daily automobile trips from the project site. As a multi-modal transit hub, the facility is expected to generate approximately 1,620 vehicle trips per day, including approximately 670 daily bus trips. The area would experience a net reduction of 890 vehicles per day. Existing condition capacity analysis performed at 29 key intersections in the study area indicated that two intersections (the Kellogg Boulevard/Jackson Street and Jackson Street/Shepard Road intersections) operate at or near the capacity on critical movements. Projected year 2015 and 2030 capacity analysis reveals that operations of the study intersections would not deteriorate as a result of the proposed Union Depot project. The intersections operating at near capacity will continue to do so. Therefore, there are no substantial traffic impacts associated with the proposed Union Depot project.

VEHICLE PARKING IMPACTS

The project includes construction of a new vehicle access ramp, rehabilitation of the track deck and under track areas for vehicle parking and reconfiguring the parking layout on the track deck level. The addition of 155 parking spots on the train deck, and a total of about 200 spots reserved for Amtrak and USPS operations would result in approximately 1,900 parking stalls available. Assuming an annual parking demand growth rate of 0.5 percent, the analysis indicated that in year 2015 and year 2030, the total spaces of the two parking lots would provide sufficient parking capacity to meet the estimated parking demands. The parking facilities are projected to experience a 54 percent parking occupancy in year 2015 and 57 percent parking occupancy in

year 2030. It should be noted that vehicles that are currently parked at the West Broadway Undertrack Parking Lot (as well as all future growth in parking demand) would have to park at the East Broadway Parking Lot or the Train Deck.

VEHICLE ACCESS IMPACTS

The Broadway Street/Kellogg Boulevard intersection is the only access for pick-up/drop-off vehicles and buses to enter and exit the proposed Union Depot. Currently, a parking access to the East Broadway Parking Lot is provided on Broadway Street just south of Kellogg Boulevard. The proximity to the Broadway Street/Kellogg Boulevard intersection has introduced safety concerns. Bus waiting on the south approach stop line could easily block this parking access. Closing the existing parking access has been discussed and determined to be recommended with the build out of the Union Depot. All vehicles entering and exiting the East Broadway parking lot would use the other two parking accesses on Kellogg Boulevard approximately 500 feet east of Broadway Street. The westernmost parking access is signalized and the eastern one is stop controlled. The traffic analysis indicated that both Broadway Street/Kellogg Boulevard and Kellogg Boulevard/East Parking Access intersections would operate at Level of Service A (high-quality operations) or Level of Service B (minimal disruption of traffic flow) in year 2015 and year 2030. The closure of the Broadway Street access to the East Broadway Parking Lot is not expected to cause any traffic operation deficiencies with the forecast traffic volumes.

PEDESTRIAN ACCESS IMPACTS

The narrow sidewalk along Kellogg Boulevard is not wide enough for the increased pedestrian traffic that will be generated by the rehabilitated Union Depot. To accommodate the demand and enhance the pedestrian environment, a pedestrian and bicycle way would be constructed along the south side of Kellogg Boulevard. To create the necessary space for the pedestrian and bicycle way, the deck of the track level along the south side of Kellogg Boulevard would be removed from Sibley Street to approximately Wacouta Street back to the second set of support pillars, creating an additional 20 feet of right-of-way for pedestrians and bicyclists. At Wacouta Street, the pedestrian and bicycle way would go under the track level to Broadway Street. East of Broadway Street pedestrians would travel parallel to Kellogg Boulevard on the existing sidewalk until it connects with the shared-use path on the Kellogg Bridge. Lighting would be added to the underside of the track level over the sidewalk and under the tracks along Sibley Street.

For access to the train deck from the west, stairs and an ADA-compliant ramp would be constructed to enable access from the intersection of Sibley Street and Kellogg Boulevard to the train deck. On the east end of the site there would be a sidewalk going up the ramp from the intersection of Broadway Street and Kellogg Boulevard to the train deck. Within the parking facility, an elevator and stairs would also be provided from the under-track level to the train deck and concourse. Curb ramps will be installed at all crosswalks within the project site. The entire Union Depot facility will be ADA compliant.



BICYCLE FACILITY IMPACTS

The Union Depot will include construction of a bicycle station on the under-track level to meet the project goal of enhancing bicycle circulation. This bicycle station will be designed primarily to benefit bicycle commuting in downtown Saint Paul and promote inter-modal transfers at the Union Depot; however, due to its location in proximity to the Sam Morgan and Bruce Vento Regional Trails, it would also enhance recreation and tourist cycling in Saint Paul. The bicycle station is proposed to include shower, locker room facilities, and enclosed parking for 200 bicycles.

TEMPORARY CONSTRUCTION ACTIVITY IMPACTS

With the historical nature of the building and surrounding area, reviewing and monitoring plans will need to be put in place to ensure maintenance of the integrity of the historical buildings.

Temporary impacts from construction noise, vibration and dust are anticipated. Vibration due to construction operations would need to be continuously monitored, especially with regard to the historical structures and the structural integrity of the various elements. Structural stability of the concrete deck and lower level columns would require monitoring during removal of the soil on top. Fugitive dust (i.e. soil material that becomes airborne) and emissions from construction equipment are potential air quality impacts. Air quality will need to be monitored during construction due to the various contaminants in the soil.

Temporary visual impacts would result during operation of equipment, transportation of materials to and from the construction site, staging of equipment, and stockpiling of materials.

Temporary impacts to the transportation system could include short-term roadway lane restrictions, and short-term roadway closures. Temporary closure of sidewalks adjacent to the project site may be necessary during construction. Property access surrounding the construction area could be temporarily impacted, and temporary construction easements may be required during construction.

Current 'surface' parking within the project site would be either eliminated by the construction, or temporarily closed during construction. Parking in the lower level area would need to be temporarily closed during construction operations.

Contaminated materials have been identified as part of the Phase II Environmental Site Assessment. Further testing of materials would be needed to determine what type of monitoring and disposal are required to meet state regulations.

PHYSICAL ALTERATION

The physical alteration of the Union Depot (described in Section II – Proposed Action of this document) would be planned and designed carefully to meet the Secretary of Interior's Standards (Standards) for the Treatment of Historic Properties, where possible. The specific impacts and



mitigation measures of this alteration are the subject of the Section 106 Programmatic Agreement developed for this project.



V. AVOIDANCE ALTERNATIVES

The Union Depot's purpose and need are described in detail in the EA. The project is intended to address deficiencies in the existing transportation network related to:

- Inadequate connections between regional and local transit service
- Lack of overall connectivity in local and regional transportation system
- Inadequate local transit layover facilities
- Inadequate ability to accommodate planned future rapid transit lines
- Existing facilities discourage bicycle circulation
- Existing facilities discourage pedestrian movements
- Existing transportation system promotes dependence on the private automobile
- Limited potential uses for the transportation portion of the Union Depot
- Lack of economic opportunities at transit facilities

The No Build and Build Alternatives were evaluated in light of the project's purpose and need.

NO BUILD

Initially, the No Build Alternative would have little impact on the Union Depot. The vehicular traffic near the Union Depot would experience a decrease in USPS truck traffic when postal operations are moved to another facility in Eagan, MN.

There would be little change in the viewsheds of the historic Union Depot. Over the long-term, the No Build Alternative leaves the Union Depot historic property without a use that would ensure its long-term maintenance and repair; consequently preservation through use would be unlikely. A condition where the property is not occupied and maintained adequately could result, over time, in the loss of a contributing property from the Lowertown Historic District.

The No Build Alternative does not meet the project purpose and need. It does not increase connections between local and regional transit service, increase overall connectivity in the transportation system, correct transit operations deficiencies, accommodate future rapid transit connections, improve non-motorized transportation access, improve potential transportation uses of the Union Depot or encourage economic development at transit facilities.

BUILD ALTERNATIVE

The LOCATE task force considered alternative sites for the location of a multi-modal transit facility in Saint Paul. Due to high space and infrastructure costs, and the long life of railroad alignments, particular attention was given to the relationship between the terminal's assumed future passenger train activity and the large and growing volume of freight traffic on the mainline railroad tracks passing through and near downtown Saint Paul. The sites were also evaluated relative to accessibility to all public transportation modes, parking availability, and motor vehicle and pedestrian access. Based on these criteria, it was determined three of the four

alternatives were not prudent or feasible to achieve project goals and were thus eliminated from further consideration. The discussion of these alternatives and their elimination from further consideration is discussed in Section 3.1 Screening of Alternatives in the Environmental Assessment for Minnesota's Union Depot.

The Build Alternative described in this Section 4(f) Evaluation meets the project purpose and need. It increases connections between local and regional transit service, increases connectivity in the transportation system, corrects transit operations deficiencies, accommodates future rapid transit connections, improves non-motorized transportation access and improves potential transportation uses of the Union Depot or encourage economic development at a transit facility.



VI. MEASURES TO MINIMIZE HARM

SITE DESIGN OPTIONS

After identifying the Union Depot site as the most appropriate location for a downtown multi-modal transit hub, a number of site design options were considered. These design options were intended to minimize the exterior visual impact of new construction or minimize physical alteration of the existing structure.

Alternative Vehicular Access: Initial alternatives considered vehicular access to the train deck from Sibley Street and a number of alternative locations along Kellogg Boulevard to avoid disturbing the current configuration of the train deck. Either of these locations would have required adding a new signalized intersection on Kellogg Boulevard. In addition, providing access from Sibley Street would have limited egress from the under track level. As a result, access to the train deck was eventually located on Kellogg Boulevard opposite Broadway Street, where the current ramp is located, to minimize impacts to traffic operations. There is an existing traffic signal at Broadway that can accommodate turning movements into and out of the site.

Pedestrian Vertical Circulation. Consideration was given to locating pedestrian vertical circulation elements (elevators, escalators, stairs) both on the exterior of the east wall of the concourse and waiting room and through the floor of the waiting room. Vertical circulation into the floor of the waiting room was eliminated from consideration for the following reasons:

- The floor of the concourse and waiting room was built of two concrete slabs with an air space of about 18 inches between them in which a radiant heating system was placed for warming the floor. Cast-iron plates, 30 inches wide, are imbedded in the lower slab directly over the center lines of tracks to protect the concrete against the direct blast from locomotive exhaust chimneys.
- During the construction period for the original buildings composing the Union Depot and during later maintenance activities, it is likely that asbestos was used as a building material. Minimizing physical impacts to the structures limits the amount of asbestos that could be disturbed by construction activities associated with the proposed project.
- Bringing the vertical circulation into the floor of the waiting room would use much of the floor space and present an obstacle to pedestrian circulation through the length of the waiting room.
- In some of the platform locations, it would not be possible to locate the vertical circulation in the floor of the waiting room without relocating the columns supporting the waiting room.

Maintaining Historic Character - In the development of the Build Alternative, extreme care was taken to re-introduce elements that were formerly part of the Union Depot facility or to plan for making only inconspicuous modifications to existing components of the historic resource.

For instance, the vertical circulation to the train platforms and bus transfer island are located on the east side of the waiting room, as they were in the past. Exterior vestibules are envisioned to be similar to the vestibules shown in historic photos of the Depot. New elements of the project, such as the new vehicle access ramp to the train deck near Broadway Street, would be introduced on the southern boundary of the district and would not be visible from many other contributing properties in the Lowertown Historic District or nearby parkland. The only building demolished in the project is a non-contributing building (1978 USPS Annex Building).

MITIGATION MEASURES

The Mn/DOT CRU on behalf of Federal Highway Administration (FHWA), and in consultation with Minnesota State Historic Preservation Office (MnSHPO) and the HPC, determined that the project potentially could have adverse effects on the Union Depot. A Programmatic Agreement between FHWA, Mn/DOT, RCRRA, American Council on Historic Preservation (ACHP), and MnSHPO is being developed to guide the design and construction of the multi-modal transit hub and satisfy Section 106 requirements. Provisions in the Programmatic Agreement are being developed to minimize impact to the Section 4(f) properties as stated below (and in the attached Draft Programmatic Agreement in Appendix E).

1. All design work related to this rehabilitation project will meet the Secretary of Interior's Standards (Standards) for the Treatment of Historic Properties where possible.
2. RCRRA will consult with the MnSHPO and the Mn/DOT Cultural Resources Unit throughout the design process to ensure that the rehabilitation meets the Standards.
3. RCRRA will develop an historic narrative for the Union Depot complex for use in the interpretation of the depot. The narrative will be completed by an historian who meets the Secretary of Interior's professional standards. The narrative will be reviewed and approved by Mn/DOT Cultural Resources and MnSHPO.
4. In the event that adverse effects can not be avoided, RCRRA will consult with the Mn/DOT Cultural Resource Unit and MnSHPO to reach a mitigation strategy.

Design review and consultation under the Programmatic Agreement has focused on ways to avoid and minimize impacts to this important historic resource from the rehabilitation to a modern multi-modal transportation hub. It is the goal of the agreement that all aspects of the rehabilitation meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.



VII. COORDINATION

Native American Tribes, the SHPO, Minnesota Department of Natural Resources, Mn/DOT and the St. Paul Heritage Preservation Commission were consulted to discuss impacts and solicit recommendations regarding mitigation of the property. A Section 106 Programmatic Agreement will be executed that includes documentation of the responsibilities and measures to protect the Section 4(f) resource. .

NATIVE AMERICAN CONSULTATION

Mn/DOT CRU conducted Native American consultation for the proposed project. Letters were sent to 21 tribes. Mn/DOT received three responses; each indicated that the tribe had no objections to the proposed project but requested that construction be halted if human remains and/or other cultural materials are discovered in the project area. The responding tribes were the Flandreau Santee Sioux Tribe of South Dakota, the Leech Lake Band of Ojibwe of Minnesota, and the Mille Lacs Band of Ojibwe Indians of Minnesota.

CONSULTATION WITH THE SHPO AND THE SAINT PAUL HPC

Mn/DOT CRU and RCRRA initiated the consultation process for Section 106 in spring 2007. On June 7, 2007, the first coordination meeting was held with Mn/DOT CRU, RCRRA, SHPO, and HPC representatives in attendance.

On June 26, 2007, Mn/DOT CRU submitted the *Phase I and II Architectural History Survey for the Union Depot Multi-Modal Transit HUB Project, Saint Paul, Ramsey County, Minnesota* (Stark and Mark 2007) to the SHPO and HPC for review. This report documented the field survey and research efforts for historic and architectural properties for the proposed Union Depot project. On August 31, 2007, Mn/DOT CRU provided additional information related to the Endicott Arcade property located within the Area of Potential Effect (APE) for the project with respect to historic architectural resources.

RCRRA met with the HPC staff several times to review conceptual plans for the reuse of the Union Depot property and consultations with the SHPO and Mn/DOT CRU continued during fall 2007. Because the Build Alternative would require the removal of the 1978 USPS Annex Building, Mn/DOT CRU consulted with the SHPO regarding the effect of this removal on October 17, 2007. On October 22, 2009, the SHPO concurred that removal of this structure, if done with care to preserve the extant historic components of the elevated train deck, would not constitute an adverse effect.

Mn/DOT CRU provided additional information to the SHPO in a letter dated December 14, 2007. In this letter, Mn/DOT CRU indicated that the APE for historic and architectural properties would be extended to the opposite (south) side of the river. At that time, Mn/DOT CRU suggested that there would be no adverse effect to properties located on the south side of

the river because of the use of that area for industry and as a barge loading area. The boundaries of the Union Depot Historic Property were also discussed, as was the fact that an archaeological investigation of the property east of Broadway Street was planned.

The SHPO responded to the December 14, 2007 letter on January 23, 2008. In this letter, the SHPO acknowledged receipt of the December letter and requested clarification on several points. A May 23, 2008, letter from Mn/DOT CRU provided the clarifications. In it, Mn/DOT CRU indicated that the archaeological investigation had been completed and that it was unlikely that intact archaeological resources are located within the bounds of the APE for the Union Depot project. Mn/DOT agreed to evaluate two buildings located on the south side of the river for eligibility to complete the survey and evaluation for historic properties appropriate for the proposed project.

Mn/DOT CRU, on behalf of FHWA and in consultation with SHPO and the HPC, determined that the project potentially could have adverse effects on historic properties. Therefore, FHWA, Mn/DOT, and RCRRA developed a draft Programmatic Agreement with SHPO, to guide the design and construction of the Union Depot Multi-modal Transit Hub and to satisfy Section 106 requirements (Appendix E).

With respect to Section 4(f), as described in the EA, there are no Section 4(f) uses (excluding the Union Depot of the proposed project).

Consultations with SHPO and the HPC continue as project planning and design proceed. The project was presented to the HPC on December 6, 2007.

SUMMARY OF COORDINATION WITH APPROPRIATE FEDERAL AGENCIES

A documentation of coordination with appropriate federal agencies, accompanied by copies of all formal coordination comments, is contained in Appendix D.

SUMMARY OF ALL FORMAL COORDINATION COMMENTS RECEIVED

AMTRAK (5/13/04 AND 2/4/09)

Amtrak expressed its general support of the project, then reaffirmed its commitment to the project, are contained in Appendix A.

GREYHOUND (8/5/08)

Greyhound expressed interest in participating in the project but could not fully commit until it resolved issues involving site, facility plan, lease terms, and financial commitment, is contained in Appendix A.



JEFFERSON LINES (7/24/08)

Jefferson Lines supports the project and would operate its passenger service from the proposed Union Depot, is contained in Appendix A.

METRO TRANSIT (9/12/08)

Metro Transit appreciated the concern given to accommodating a high volume of local bus transit service in the concept plans but noted that details remain to be resolved on rerouting bus service to terminate at the Union Depot so that it cannot commit to the precise number of bus trips or routes that will use the rehabilitated facility, is contained in Appendix A.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES (12/20/07)

MnDNR reviewed its database and stated that it does not believe the project will negatively effect any known occurrences of rare features, is contained in Appendix I.

MNDOT'S NATURAL RESOURCE SPECIALIST (1/15/08)

MnDOT reviewed the proposed action for potential effects to federally-listed threatened, endangered, proposed, candidate species and listed critical habitat and made a determination of no effect, is contained in Appendix H.

STATE HISTORIC PRESERVATION OFFICE

(To be completed when Programmatic Agreement is finalized.)

VIII. CONCLUSION

(To be completed following public comment.)



This page is intentionally left blank.