

920 Vesper Road
Ann Arbor MI 48103
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Eli Cooper
Transportation Program Manager
City of Ann Arbor
301 E. Huron St, 4th Floor
PO Box 8647
Ann Arbor, MI 48107

Re: Ann Arbor Intermodal Station, Environmental Assessment

These are my comments on the EA with regard to the requirements of the National Environmental Policy Act (NEPA), especially for Section (4f) properties. Kindly transmit them to all interested parties as appropriate, including the Federal Railroad Administration.

Evidently the EA is meant to support a location for a new station on Fuller Road, at the site of the current UM-leased parking lot in Fuller Park. Indeed, on p. 49 of the main document, it is stated: *Based on the analysis of potential impacts to the affected natural, human and physical environments, constructability and cost, and the evaluation of those impacts comparatively amongst the No Build Alternative and the four Build Alternatives, the City has identified Build Alternative 3A as its Preferred Alternative.*

Finding of No Significant Impact

A FONSI is a requirement under NEPA. Build Alternatives 3A, 3B, and 3C are all for design alternatives in Fuller Park. The EA correctly rules out alternatives 3B and 3C, which leaves a relatively circumscribed portion (3A) of the Park to be developed. But clearly even this smaller footprint does not protect Fuller Park from a significant impact. There is a substantial parking structure that faces the remainder of the park, and there will be additional roadways and signage associated with the parking and station. In addition, should this station truly be developed as a multimodal or “intermodal” facility, there appears to be no room for additional vehicles, loading, passenger routing, etc. Evidently the additional modes would be by city bus and possibly light rail (the “Connector”). These do not appear to be displayed in the design but would not be inconsequential.

There is an additional possible impact, in that by most modern perspectives, additional commercial or even residential development would be called for near such a substantial transit node. (Transit-oriented development or TOD.) But as the EA indicates, the only place for any development on this limited footprint would be in some additional stories to the parking garage. That in turn would limit the use of that building for expanded transit modes.

The remainder of Fuller Park would pose an inviting vista to development pressures. (Indeed, there have been schemes proposed there in the past.) Yet between the park, University of Michigan property, and the UM hospital grounds, there are no places to develop. It seems reasonable that political pressure in the future could threaten the survival of the park or limit its use because of development.

Prudent and feasible alternative

One requirement of the NEPA is that for Section 4f. properties, there is no “prudent and feasible alternative”.

P. 49 of the EA describes a screening system is described whereby (confusingly) higher numbers are a negative score, so that for each quality used to screen locations, (1) is a better score than (4) and a higher aggregate score would disqualify a particular site. Results of screening using that system are summarized in Exhibit B of the “AA Station Alternatives Analysis Report Phase II” (p. 42 of that other document). That table reveals that Alternatives 2A and 2B (Depot Street) received the same score (10) as did the chosen alternative 3A. Alternatives 2C, 3B, and 3C all received higher (less favorable) scores.

Table 7: Screening Summary

Criteria	Design Alternative		
	Site 2A	2B	2C
Location within the Community	2	2	2
Accessibility and Parking	3	3	4
Site Assessment	5	5	7
Aggregate Rating	10	10	13

Criteria	Design Alternative			
	Site 3A	3B	3C	3D
Location within the Community	2	2	2	2
Accessibility and Parking	3	4	3	3
Site Assessment	5	6	6	6
Aggregate Rating	10	12	11	11

Thus, it is evident that using the screening system developed to assess the different sites, there are indeed “prudent and feasible” alternatives.

TOD

Although future development plans for the City of Ann Arbor are perhaps beyond the scope of the EA, it should be acknowledged that TOD is a likely consequence and also a community goal. As commented earlier, alternative 3A does not offer many options other than developing more of Fuller Park. The Depot site (2A, 2B) is directly adjacent to considerable acreage owned by DTE Company. DTE has indicated in numerous interviews and comments that there is an interest in collaborating with the City of Ann Arbor in developing the riverfront area.

The EA comments (p. 55) that “Build Alternatives 2A, 2B, and 2C are near to more vacant property than 3A, particularly the Amtrak and DTE Energy property north of the existing station. However, Build Alternatives 2A, 2B, and 2C also occupy a substantial amount of the developable portion of this vacant land.” But this statement ignores the extent of the DTE property. Depot St. is also close to North Main Street, where development is contemplated, and a tunnel that would provide pedestrian access to Main Street has been discussed.

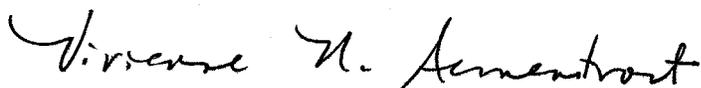
Extraneous arguments

Some of the justifications to choose 3A over 2 A/B are based on cost estimates that are open to question. For example, more study is needed to establish that the recently reconstructed Broadway Bridge would really have to be widened. Evidently road reconstruction related to a Fuller Road roundabout was not included. Indeed, an arithmetical error was found in the calculations (in the vicinity of \$5 M). These cost arguments do not seem to overwhelm the relative suitability of the two sites according to NEPA guidelines.

Another set of arguments seems to be related to two transit systems that do not currently exist. That includes the Connector (<http://www.aconnector.com/>), a light rail system that would extend a relatively short distance to connect two UM campuses. The cost of this system appears to have put it on indefinite hold and it is not currently going forward. Should that change in the future, it seems that a platform near the UM hospital could still be constructed with much less impact than the contemplated station complex.

The other envisioned transit system would be the Ann Arbor-Detroit Commuter Rail (<http://semcog.org/Ann-Arbor-to-Detroit-Regional-Rail-Project>). Again, though a fair amount of planning has gone into this concept, there has been no forward motion on it, and now that the hoped-for-host, the Southeast Michigan Regional Transit Authority, has not been able to secure funding, its future is uncertain. But clearly the ridership figures on which the parking requirement was based are at least in need of adjustment.

In conclusion, choice of the (3A) design alternative does not seem to be justified, given its placement and threat to Fuller Park. Neither the FONSI requirement nor the “prudent and reasonable alternative” have been satisfied.



Vivienne Armentrout