



SIERRA CLUB

Huron Valley Group

To:
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Re: Sierra Club comments on the Environmental Assessment for the Ann Arbor Station Intermodal Station

Submitted via email by
Nancy Shiffler, Chair
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These comments are submitted on behalf of the Huron Valley Group of the Sierra Club, which represents more than 3700 members in Washtenaw, Lenawee, and Monroe Counties. Our organization supports the goal of improving the public transportation systems within our city and region, including improvements to the Ann Arbor Amtrak station. At the same time we firmly support protecting and preserving our parklands and natural features from development for non-park uses. We do not believe these positions are mutually exclusive.

Over the past several years we have participated in numerous public meetings and submitted comments on this project to the city, the Michigan Department of Transportation, and the FRA. After reviewing the current Environmental Assessment (EA), we argue that the selection of alternative 3A (Fuller Park) as the preferred alternative is inappropriate for the following reasons, which are explained in depth below:

- the impact on Fuller Park is not de minimus; and
- the Depot Street site provides prudent and feasible alternatives that are in many ways superior to the Fuller Park site.

Impact on Fuller Park is not de minimus

The project would constitute a direct use of the parkland on the south side of Fuller Road, and the impact on the rest of the park north of Fuller Road would be sufficient to be deemed a constructive use. A constructive use by definition cannot be de minimus.

- This project proposes to change a PL (Public Land) use from “parkland” to “transportation facility.” This has not been done before in Ann Arbor. The repurposing of parkland to another non-park use would set a particularly egregious and significant precedent. Fuller

Park is one of the major regional parks, with an Olympic-sized pool and six major soccer fields along with additional athletic fields. The park is an essential river valley park providing some of the remaining open view sheds of the valley; it serves as a central link in the chain of parks along the river. There is no way to replace this value.

- 4.7 acres (7.9%) of the park would be permanently converted to transportation usage, including a 5-story parking structure, driveways, turn lanes, and storm water management. This is more than the current 1.8-acre surface parking footprint.
- Increased traffic congestion for entry to the station (and access to the UM Medical Center) would complicate access to and enjoyment of the park activities on the north side of Fuller Road. The Fuller Park corridor serves as a major center of recreational activity for walking, biking, swimming, canoeing, and soccer. Biking and walking would be less safe, less enjoyable, and less healthful due to the congestion and the complicated driveways, turn lanes and roundabout through this area.
- The EA admits to increases in noise and air pollution but minimizes the impacts as below established thresholds. However, the combined impact of noise and air quality, particularly in close proximity to activities in the swimming pool should be of concern.
- The EA admits that the parking structure would “add new visual features to Fuller Park,” but dismisses this as “not highly noticeable to park users, given the dominant multistory U-M facility structures south of Fuller Road.” The hospital structures are set back and uphill from the park; the eye-level view for park users would be of a decidedly noticeable 5-story parking garage.
- In its discussion of transit oriented development, the EA indicates properly that, being surrounded by publicly owned land (city or university), the Fuller Park site offers few opportunities for transit-oriented development. However, the presence of a station creates its own pressure for development. The EA itself suggests the potential for vertical development, presumably on top of the 5-story parking structure. Not included in the EA was this reference found in a recently FOIA’d copy of minutes from a May 22, 2017 project kickoff meeting of city, MDOT, and design consultant staff: a reference to “a 3,000 SF space in the parking deck for a future use,” with an indication that this would be on top of the parking deck. The possible uses included community space, University uses, and joint development projects with realtors. Indeed, a few comments from public meetings have suggested such commercial and office development and riverside restaurants in the park. We find it concerning that these references to usable space on top of the park deck were part of the initial design specs, but they were not mentioned in the EA. The potential for additional impact on the park view shed and on traffic congestion should be considered. By creating the precedent of repurposing parkland to another use, the selection of this site opens the door for more of the same.

For these reasons, the direct and constructive use impacts of alternative 3A adversely affect the features, attributes, and activities in Fuller Park in a manner much more than de minimus. They would create a very altered experience for park users. The EA should instead be considering the

potential for the other sites to serve as prudent and feasible alternatives to the use of parkland at Fuller Park.

The Depot Street site provides prudent and feasible alternatives that are in many ways superior to the Fuller Park site.

The EA states that all of the alternatives meet the Purpose and Need statement for the project. The section 4(f) analysis concludes alternatives 2A and 2B provide prudent and feasible alternatives to the historic property issues of 2C, and present no park use issues (Table 4.2); alternative 3A is categorized as having only de minimus use of Fuller Park. We have argued above that the impact of 3A is not de minimus. For the reasons listed below, we believe alternatives 2A and 2B (and potentially 2C) serve as prudent and feasible alternatives:

- In the EA Purpose and Need statement, one of the criticisms of the current station is that it “lacks visibility and compelling design to serve as a gateway to the City of Ann Arbor.” All of the Depot Street alternatives offer designs that can remedy that concern. In the design for the Fuller Park site, the station would be hidden behind the 5-story parking structure and would not even be visible from Fuller Road – hardly a gateway.
- The Depot Street site in general has the advantage of being closer to downtown, within relatively easy walking distance of housing, businesses, government offices, restaurants, and stores.
- The Depot Street site also splits the traffic impact of cars and buses between Broadway and Depot Street, roughly five lanes on each and at two different levels. The Fuller Park site, on the other hand, concentrates all of the traffic on one street – 4-lane Fuller Road, which is already congested and presents problems for emergency vehicles approaching the hospital. Traffic circulation and access is complicated. An AAATA bus traveling westbound on Fuller will have riders with different destinations – some may want to get off (or on) at the swimming pool on the north side of the road, others may want the bus to drop them off at the station, and still others may want to take the bus directly to the medical center or elsewhere, and they will be delayed as the bus pulls into the station and then must exit turning east on Fuller in order to use the Michigan left turn to get back to west-bound Fuller.
- The Depot Street site has closer access to freeways – M14, US 23, and I-94.
- The Depot Street site is better suited to encourage transit-oriented development on the DTE site and for proposed Lower Town development. It already has nearby access to restaurants and other businesses, and has the potential to become a true urban hub. As noted above, the Fuller Park site is primarily surrounded by public land, either city parkland or university property.
- The cost estimates, while currently very preliminary, show higher costs for the Depot Street sites (\$94-97million) compared to Fuller Park (newly adjusted upward to \$86 million).

However, the city admits that these are estimated primarily to provide an “order of magnitude” sense of the costs, not to provide a precise accounting.

- A major portion of the difference relates to the likelihood of needing to purchase land from Amtrak and possibly DTE at the Depot Street sites. These costs would be a matter of negotiation, so costs are speculative.
- While right of way costs at Fuller Park are listed at \$0, one might consider what it would cost to purchase land to replace the lost parkland, or consider to what degree the land purchase costs might be partially offset by increased development at the Depot Street site.
- One could also question the degree to which widening the 5-lane Broadway Bridge is actually necessary, or why the cost of the Fuller/Medical Center Drive round about was not included in the cost for the Fuller Park site.
- Costs for the parking structures and the actual station are similar across all alternatives, and savings could be considered in all cases, especially if the full build on the parking structures is less than projected. In the case of alternative 3A, there was no indication of what addition costs might be involved if the to-be-named-later 3,000 sq. ft. add-on to the top of the structure is realized.
- Site 2A at Depot Street has an advantage in that no track improvement costs would be required at phase one compared to all of the other sites.

We believe the EA grossly underestimates the impact alternative 3A would have on Fuller Park – significant impact well beyond the de minimus level. We also believe the EA mistakenly exaggerates the difficulties and underplays the strengths of the Depot Street site as a prudent and feasible alternative. We urge you to reconsider the choice of alternative 3A as the preferred alternative and to give stronger consideration to the Depot Street sites.

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