

July 27, 2009

Dwight B. Sinks
Federal Transit Administration
Region V Office
200 West Adams Street. Suite 320
Chicago, Illinois 60606

Re: Complaint against the Central Corridor Light Rail Project, Twin
Cities, Minnesota.

Dear Mr. Sinks,

On behalf of our members and those business and property owners listed herein, located in Minneapolis and St. Paul, Minnesota, where the Central Corridor Light Rail System is proposed to be built, the Capital City Business Council of Saint Paul submits this complaint. Although this complaint has been submitted within the 30 day public comment period provided by the Metropolitan Council more time is necessary to reasonably read, comprehend and comment on this 2500 page document.

Complaint and points to remedy

Time to review: The 30 day public review and comment time is simply inadequate for the volume and complexity of the 2500 page Environmental Impact Study. Additional time is required for a fair assessment by the public. In Addition, the \$800.00 purchase price has been a substantial barrier to the public's ability to obtain access to the study for reasonable review.

Community notification: Inadequate notification, inquiry, and discussion by the Metropolitan Council with business and property owners on University Ave. must be addressed. This problem became quite apparent during a survey commissioned by our organization which found that according to those contacted this was the only survey conducted during the entire multi year environment study period. It was the only time these effected parties had been contacted to solicit their opinions and concerns. The Metropolitan Council's assertion that 30,000 people interviewed and 1300 public meetings conducted managed to miss the most affected people by the train system.

Safety: During the estimated four year construction period and long term operation of the system, safety issues including, parking, noise, pedestrian safety, snow removal, automobile congestion and many others have yet to be adequately addressed or resolved.

Compensation and mitigation The absences of notice, reasonable terms of compensation and the burdensome application process for mitigation funds available to individual property owners and businesses have yet to be fully addressed.

Unequal treatment: The unequal and discriminatory treatment of some property and business owners with regards to the construction, noise and other effects relating to the building, maintenance and operation of the system must be addressed. Some larger entities have lobbied for and obtained special consideration, monetary compensation, and remedies for their private concerns while smaller entities with little or no lobbying resources have not.

Route alternatives: An inadequate and comprehensive study of other alternative sites has yet to be vetted.

Premature project start: According to the Metropolitan Council, construction has already begun. This negates any reasonable or serious consideration by the Metropolitan Council to comments and concerns made during the public comment period now concluding.

Conclusion:


We would ask the FTA to complete a thorough review of all compliance items pertaining to the FEIS and their findings published upon completion.

For the reasons above we believe the Metropolitan Council has failed in its responsibility to treat effected parties on a fair and equal basis and also it has compromised the trust of the citizens of our community by beginning construction of this project before the public has had an opportunity to fully review, comment, seek remedies and assess the full impact on our community.

Therefore we ask the project should be classified as "medium-low, or low" based on the results of the alternatives analysis, the project justification criteria, and the degree of local financial commitment, as required under individual ratings for each of the criteria established by regulation for Federal matching funding as required by 49 U.S.C. 5309.

These points are not the sum total of our complaint but a sampling due to the very short period given for public comment by the Metropolitan Council. Additional addenda are forthcoming as this environmental impact study is analyzed by our organization and others.

Sincerely,



Clint Gerner

President

Capital City Business Council