

To the members of the Parks Advisory Commission:

Attached please find comments from the Sierra Club Huron Valley Group regarding item G-3 of your October 17, 2017 agenda -- Resolution Regarding the Proposed Fuller Road Station. We believe the Environmental Assessment for Ann Arbor Station inappropriately minimizes the impact of the proposed station on Fuller Park. Please review our comments. We ask you to vote No on the resolution.

Thank you for your consideration.

Nancy Shiffler

Chair, Sierra Club Huron Valley Group



TO: The Ann Arbor Parks Advisory Commission
RE: Item G-3 on the PAC agenda for 10/17/17 – Resolution Regarding The Proposed Ann Arbor Station

These comments are submitted to PAC on behalf of the Huron Valley Group of the Sierra Club, which represents more than 3700 members in Washtenaw, Lenawee, and Monroe Counties. 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 Federal Railway Administration (FRA).

In this resolution, PAC is taking part in a FRA Section 4(f) analysis. Section 4(f) applies when a project involves the direct or the “constructive” use of public parkland, and requires a determination of whether the project “adversely affects the features, attributes or activities” of that parkland. In the face of adverse affects, the project must 1) determine whether there is a “prudent and feasible alternative” that would avoid the use of the parkland, or 2) determine that any adverse affects are minimal (de minimus) or can be made so with appropriate mitigation. A de minimus determination requires the concurrence of appropriate “officials with jurisdiction” – the officials of the agency that owns or administers the property.

Alternative 3A from the Environmental Assessment (EA) falls under the section 4(f) requirements because it directly and permanently uses a portion of Fuller Park south of Fuller Road and poses a constructive use of (impact on) the remainder of the park on both sides of Fuller Road. The EA argues for a de minimus determination. PAC is part of that nexus of officials with jurisdiction, hence the resolution before you tonight.

The Sierra Club argues that this is not just a pro forma action on PAC’s part. You have a choice in this matter and should consider it carefully. We believe the impacts on Fuller Park are much more than minimal for the following reasons:

- This project proposes to change a PL (Public Land) use from “parkland” to “transportation facility.” This has not been done before in Ann Arbor. Fuller Park is an essential river valley park providing some of the remaining open view shed of the valley. There is no way to replace this value. The precedent of repurposing public parkland to another use is particularly egregious in this instance.
- 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. 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 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 parking garage.
- 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.” In the design for the Fuller Park site, the station would be situated between the tracks and the parking structure and would not even be visible from Fuller Road.
- In its discussion of transit oriented development, the EA indicates properly that the current Depot Street site offers more opportunities for economic development. However, it does indicate that the sole option for the Fuller Park site would be vertical development, presumably on top of the 5-story parking structure. While this is obviously speculative, the potential for additional elevation impact on the park view shed should be addressed.

For these reasons, the impact of alternative 3A on Fuller Park is much more than de minimus. In particular PAC has the responsibility to consider carefully the impact on the park as a whole, not just the current surface parking lot. The resolution before PAC focuses only on the current surface lot and park funding issues (which are left unresolved). The station options at the current Depot Street site offer a prudent and feasible alternative to Fuller Park. Please consider carefully the value of the river valley in the future of our parks system. Please vote no on this resolution.

Nancy Shiffler
 Chair, Sierra Club Huron Valley Group