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APPENDIX K
COMMENTS AND RESPONSES ON THE DEIS AND SDEIS
PART 2: SDEIS
Guide to Appendix K

Appendix K is divided into two sections: 1) It contains the verbatim comments received on the AA/DEIS during the 45-day comment period following publication of the NOA in the Federal Register on April 21, 2006, and 2) it contains the comments received on the SDEIS during the 45-day comment period following publication of the NOI in the Federal Register on July 11, 2008.

A particular comment and the corresponding response can be found by using the Commenter Index or the Issue Area at the beginning of each section (DEIS or SDEIS). All comments received on the AA/DEIS and the SDEIS have been documented and responded to in the FEIS.

Agency comment letters with full text are included in Appendix E. The documents in appendix K are in the following order:

**AA/DEIS**
- K1 - AA/DEIS Table of Contents by Issue Area
- K2 - AA/DEIS Commenter Index
- K3 - AA/DEIS Comment Code Index
- K4 - AA/DEIS Comments-Response Report

**SDEIS**
- K5 - SDEIS Table of Contents by Issue Area
- K6 - SDEIS Commenter Index
- K7 - SDEIS Comment Code Index
- K8 - SDEIS Comments-Response Report

**Comment Database and Process**

A comment database was established to track all agency, tribal, and public comments received on the AA/DEIS and on the SDEIS. Public testimony was recorded at the public hearings and oral comment was recorded at the public open house meetings. Comments were also submitted by the public, organizations, and governmental agencies by letter, on comment sheets, and by e-mail. All comments received or postmarked by the end of the comment period are included in this appendix.

**Analysis Process**

The process and methodology used to track and code comments received during the public review period was a multistage process that included assigning each comment a tracking number, identifying substantive comments, grouping comments into categories, and responding to each substantive comment.
Most of the testimony and written submittals contained multiple comments. These comments were identified and, where possible, grouped into categories (e.g., purpose and need, land use, cost). Some comments did not readily fall into a specific category. These comments were placed into a “miscellaneous” comment category. Many comments in each category raised similar concerns; therefore, it was possible to group and sort issues together for a single response.

**Comment Tracking**
Each comment (e-mail, comment form, letter, transcribed oral comment, or public hearing testimony) was assigned a unique identifying number in the general order received and was entered into a database along with the name of the commenter, the date received, and contact information. In addition, each commenter was assigned an identifying number (e.g. CCLRP0779).

**Comment Coding**
After being assigned a number, each comment document was reviewed to identify the individual comments within. Each individual comment was then assigned a unique numerical code (e.g., SocEJ-1, EcoEE-2, PlaTP3), which was added to the document number. This ensured that each comment had a unique descriptor that could be readily referenced to the originator. For example: (CCLRP0760) EngTI-42.

**Issue Categories**
Next, each coded comment was studied to identify the “issue” it presented or the “why” of the comment: e.g., costs are too high, traffic will be improved, impacts are too great, the community will be adversely affected. Thus, all similar comments coded with similar issues could be sorted and grouped together for a response. For example the “issue” In Favor of Project, which was coded as PlaTP-129 had a total of 196 comments. In the Table of Comments by Issue, it is listed as: In Favor of Project (PlaTP-129) (196).
# Table of Contents by Issue Area

## Comments-Responses Report for the Central Corridor LRT SDEIS

- **1.0 - Purpose and Need for the Proposed Action**
  - Northern alignment (Pp-007) (1)

- **2.3 - Selection of Locally Preferred Alternative**
  - Concerns in regard to alignment in downtown St. Paul (A-002) (2)
  - Concerns in regard to alignment in downtown St. Paul (A-003) (1)
  - Prefers different alignments (A-004) (2)
  - University of Minnesota Alignment (A-005) (1)
  - Line should be below-grade or above-grade (A-006) (2)
  - Need discussion of alignment near the Capitol (A-007) (1)
  - Prefers different alignments (A-008) (1)
  - Impact to developable parcel (A-009) (2)
  - Prefers different alignments (A-010) (1)
  - Need more discussion of Northern Alignment (A-012) (3)
  - Line should be below-grade or above-grade (A-013) (1)
  - Line should be below-grade or above-grade (A-014) (1)
  - Stations should accommodate three-car trains (A-015) (2)
  - University of Minnesota Alignment (A-016) (3)
  - Impact to on-street parking (A-017) (1)
  - Prefers the Wacouta Mid-Block alternative (A-019) (1)
  - Impact to Minneapolis Farmer's Market (A-020) (1)
  - More discussion in regard to reasoning for selection of preferred site for Vehicle Maintenance and Storage Facility (A-021) (1)
  - Concerns in regard to alignment in downtown St. Paul (A-022) (1)
  - Station Placement (A-023) (4)
  - Station Placement (A-024) (1)
  - Recommends three additional stations at Western, Victoria, and Hamline (A-025) (2)
  - Union Depot hub (A-026) (1)
  - Need further discussion of Stadium Village Station, and Snelling and University line should be below-grade (A-027) (2)
  - Impact and benefit to community near stations (A-028) (1)
  - Further analysis needed in regard to traction power substations (Pp-056) (1)
  - Need further discussion of West Bank station (Pp-067) (1)
  - Preferred route (T-028) (1)
  - Station placement (T-033) (1)
  - Favors three-car station platforms (T-097) (1)
3.1 - Land Use and Socio-Economics

- Business impacts (Ci-008) (1)
- Impact to minority communities (Ci-009) (1)
- Utilize station plans and engage multiple project partners (Ci-010) (1)
- Mn/DOT permit requirements (Ci-011) (1)
- Mitigation measures (Ci-012) (1)
- Minimize impacts to U of M (Ci-013) (1)
- Mitigation schedule (Ci-014) (1)
- Impact for traction power substations (Lu-001) (1)
- Report corrections in regard to zoning issues (Lu-002) (1)
- Cedar Avenue station concerns (Lu-003) (3)
- Concerns in regard to maintenance facility location (Lu-005) (9)
- Wacouta Mid-Block alternative concerns (Lu-006) (1)
- Zoning concerns (Lu-014) (1)
- Collaborate with government and West Bank community organizations for project design (Lu-015) (1)
- Impact of traction power substations (Lu-016) (2)
- Concerns in regard to traction power substation locations (Lu-020) (1)
- West Bank station planning and coordination (Lu-022) (1)
- Include information for businesses between Harvard Street and Walnut St (Lu-023) (1)
- Define proposed LRT platform sizes (Lu-024) (1)
- Further define right of way requirements (Lu-025) (1)
- Washington Avenue Mall impacts (Lu-026) (2)
- Include identified future U of M development (Lu-027) (1)
- Selection of vehicle maintenance facility and zoning concerns (Lu-030) (1)

3.2 - Neighborhood, Community Services, and Community Cohesion

- Report corrections needed (Ge-002) (1)
- Involve and communicate with the public and interested parties throughout project (Ge-004) (1)
- Impact to church access (Ge-006) (1)
- Concerned that many impacts were not addressed (Ge-008) (3)
- Snow removal plan (Ge-009) (1)
- Report corrections needed (Ge-010) (1)
- Concerns about adverse effects to Church characteristics and practices (Ge-011) (1)
- Cumulative traffic effects (Ge-012) (1)
- Concerns about placement and mitigation for TPSS (Ge-013) (1)
- Clarification/Information needed in regard to U of M utilities (Ge-014) (2)
- Involve and communicate with the public and interested parties
<table>
<thead>
<tr>
<th>Issue Area</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ge-015</td>
<td>Throughout project (1)</td>
</tr>
<tr>
<td>Ge-016</td>
<td>Report correction needed (1)</td>
</tr>
<tr>
<td>Ge-017</td>
<td>Additional traffic impact analysis needed along corridor (1)</td>
</tr>
<tr>
<td>Np-001</td>
<td>Must address overall community impact (1)</td>
</tr>
<tr>
<td>Np-003</td>
<td>Concerns in regard to gentrification (1)</td>
</tr>
<tr>
<td>Np-004</td>
<td>Concerns in regard to property tax increases (1)</td>
</tr>
<tr>
<td>Np-005</td>
<td>Concerns in regard to gentrification (1)</td>
</tr>
<tr>
<td>Np-006</td>
<td>Concerns in regard to preserving existing community (1)</td>
</tr>
<tr>
<td>Np-007</td>
<td>Concerns including impacts to business not close to stations (1)</td>
</tr>
<tr>
<td>Np-008</td>
<td>TPSS must not be located near residential or historically sensitive properties (1)</td>
</tr>
<tr>
<td>Np-009</td>
<td>Concerns about impact of TPSS on neighborhood cohesion (1)</td>
</tr>
<tr>
<td>Np-010</td>
<td>Concern about gentrification and disproportionate impacts (1)</td>
</tr>
<tr>
<td>Np-011</td>
<td>Concerns in regard to lack of proposed mitigation (1)</td>
</tr>
<tr>
<td>Np-012</td>
<td>Concern about gentrification and disproportionate impacts (1)</td>
</tr>
<tr>
<td>Np-013</td>
<td>Disagrees with analysis in regard to disproportionate impacts (1)</td>
</tr>
<tr>
<td>Np-014</td>
<td>Concerned about station locations and designs (1)</td>
</tr>
<tr>
<td>Np-015</td>
<td>Full analysis of community cohesion impacts and proposed mitigation measures is needed (1)</td>
</tr>
<tr>
<td>Np-016</td>
<td>Full analysis of impacts and proposed mitigation, are needed for preserving community cohesion and diversity (2)</td>
</tr>
<tr>
<td>Pp-039</td>
<td>Economic benefit for whole community (1)</td>
</tr>
<tr>
<td>Pp-053</td>
<td>Economic benefit for whole community (1)</td>
</tr>
<tr>
<td>Ql-001</td>
<td>Concern that loss of &quot;buffer of parked cars&quot; will decrease pedestrian safety, and impact businesses (1)</td>
</tr>
<tr>
<td>Ql-002</td>
<td>Concerns in regard to community cohesion (1)</td>
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<tr>
<td>Ql-003</td>
<td>Concerns in regard to impact on churches and funerals (1)</td>
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<tr>
<td>Ql-004</td>
<td>Concerns in regard to impact on weddings and funerals (1)</td>
</tr>
<tr>
<td>Ql-005</td>
<td>Concerns in regard to impact of overall quality of life and health in the community (1)</td>
</tr>
<tr>
<td>Ql-006</td>
<td>Concerns about impacts to Cedar-Riverside businesses (1)</td>
</tr>
<tr>
<td>Ql-007</td>
<td>Concerns about vibration impacts (1)</td>
</tr>
<tr>
<td>Ql-008</td>
<td>Concerns about impact on ceremonial life of institutions (1)</td>
</tr>
<tr>
<td>T-001</td>
<td>Concerns about impacts and mitigation for church activities (13)</td>
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<td>T-008</td>
<td>Impact on neighborhood connectivity (1)</td>
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<tr>
<td>T-009</td>
<td>Impact of Washington Ave Bridge modifications on neighborhood connectivity (1)</td>
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<tr>
<td>T-012</td>
<td>Impact on access to residences and businesses (1)</td>
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<tr>
<td>T-014</td>
<td>Impact on access to residences and businesses (1)</td>
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<tr>
<td></td>
<td>Concerned that LRT will be a barrier impacting neighborhood</td>
</tr>
</tbody>
</table>
3.3 - Acquisitions and Displacements/Relocations

- Alignment concerns related to acquisition (Ci-001) (1)

3.4 - Cultural Resources

- Impact to historic approach to Union Depot (A-001) (1)
- Concerns about impact to church near the Tenth Street Station (Ph-001) (1)
- Parking and access concerns (Ph-002) (1)
- Include U of M in design process (Ph-003) (1)
- General concerns in regard to project impacts and mitigation (Ph-004) (3)
- Include explanation of transit mall section from Pleasant to Walnut (Ph-005) (1)
- Concerns about lack of mitigation for impacts to churches (Ph-006) (1)
- Concerns about impacts on historic buildings (Ph-007) (1)
- Proposed designs must conform to current architecture and community (Ph-008) (1)
- Report corrections needed (Ph-009) (1)
- Report corrections needed (Ph-010) (1)
- Report corrections needed (Ph-011) (1)
- Station design strategy is needed (Ph-012) (1)
- Historical and cultural resource mitigation plans needed (Ph-013) (1)
- Concerns about impacts to historic properties during construction (Ph-014) (1)
- The design of the station at 10th & Cedar must be sensitive to nearby historic buildings (Ph-015) (1)
- Archeological survey discussion needed (Ph-016) (1)
- Encourage the rehabilitation of historic properties (Ph-017) (1)
- Need discussion as to why 4f impacts could not be avoided (Ph-018) (1)
- Analysis/clarification needed in regard to impact on river park and parkway resources (Ph-019) (1)
- General concerns in regard to impacts and mitigation (Ph-020) (2)
- Project must conform to preservation standards in regard to designated historic districts (Ph-021) (1)
- Report corrections needed (Ph-022) (3)
- Report clarifications/corrections needed (Ph-023) (1)
- Need to minimize and clarify extent of "trench" in roadway (Ph-024) (1)
- Disagrees that impacts will not be adverse (Ph-025) (1)
- Concerned about impacts to St. Paul's historic transportation center (Ph-026) (1)
- Concerns about impacts on historic resources (Ph-027) (2)
- Concerns about visual effects (Ph-028) (1)
- Report corrections needed (Ph-029) (1)
- Concerns in regard to impact of historic properties for St. Paul Union Depot and the Capitol area (Ph-030) (1)
- Concerns that National Historic Preservation Act requires further evaluation (Ph-031) (1)
- Report clarification/corrections needed in regard to historic property effects/analysis (Ph-032) (1)
- Collaborate with State historic and cultural agencies in regard Section 106 process (Ph-033) (1)
- Report corrections needed (Ph-034) (1)
- Report corrections needed (Ph-035) (1)
- Concerns about station and related element design (Ph-036) (1)
- Design must be sensitive to St. Paul Urban Renewal Historic District area (Ph-037) (1)
- Design should be sensitive to businesses and historic resources (Ph-038) (3)
- Mitigation should protect historic properties from noise and vibration impacts (Ph-039) (1)
- Concerns about impact to St. Paul historic resources and church environment (Ph-040) (5)
- Concerns about impacts by 10th Street station, traction power substation and related elements (Ph-041) (1)
- Concerns about impact by traction power substations and poles and catenary (Ph-042) (2)
- Impacts and mitigation measures need to comply with neighborhood historic criteria (Ph-043) (2)

3.6 - Visual Quality and Aesthetics

- Recommends collaborating with community in regard to visual impacts (Ae-001) (1)
- Use art for community preservation; ensure safe ped and bike access (Ae-002) (1)
- Concerns about impact of station and overhead cables to views of Capitol (Ae-003) (1)
- Concerns about impact of station and overhead cables to views of Central Presbyterian Church (Ae-004) (1)
- Need to determine measures to mitigate visual impact near the U of M; and traffic displacement concerns (Ae-005) (1)
- Recommends engaging community to for visual quality integration of streetscape, station design and public art work (Pp-001) (1)
3.7 - Safety and Security

- Concerns about pedestrian safety and environment (Saf-001) (9)
- Concerns about station security (Saf-002) (1)
- Concerns about impact to traffic and pedestrian safety, especially at intersections (Saf-003) (1)
- Concerns about electricity effects of project such as stray voltage (Saf-004) (1)
- Concerned that centralization of mass transit is vulnerable to terrorism (Saf-005) (1)
- Concerns about pedestrian safety, especially for persons with mobility issues (Saf-006) (1)
- Recommends reducing speed limits to increase safety (Saf-007) (1)
- Safety should be fundamental/top project goal (Saf-008) (1)
- Concerns about sabotage to system, and concerns about stray and stationary electricity effects on people (Saf-009) (1)
- Analyze impacts of re-routing Bus Route 16 and plan mitigation to ensure pedestrian safety (Saf-010) (1)
- Report correction in regard to UMPD responsibilities (Saf-011) (1)
- Report correction in regard to UMPD responsibilities (Saf-012) (1)
- Report correction in regard to Minneapolis Police Precincts responsibilities (Saf-013) (1)
- Report clarification suggested (Saf-014) (1)
- Concerns about impacts to pedestrian and bicyclist safety in U of M area (Saf-015) (1)

3.8 - Environmental Justice

- Concerns about disproportionate impact to sensitive communities (Ej-001) (14)
- Concerns that stations are spaced too far apart, which will negatively impact environmental justice communities (Ej-002) (6)
- Concerned that station locations are not fair to environmental justice communities (Ej-003) (3)
- Concerned that station locations are not fair to environmental justice communities (Ej-004) (1)
- Concerns about negative impact to environmental justice communities (Ej-005) (1)
- Concerns that station placement favors non-minority communities (Ej-006) (4)
- Concerns that stations do not benefit environmental justice communities (Ej-007) (1)
- Concerns about negative impacts to environmental justice communities due to loss of on-street parking (Ej-008) (3)
- Concerns about changes to bus route #16 and related impact to environmental justice communities (Ej-009) (4)
- Concerns about changes to local property taxes and related disproportionate impacts (Ej-010) (1)
- Concerns about disproportionate impacts to minority-owned business along east end of corridor, due to construction and permanent loss of parking (Ej-011) (1)
- Need to account for environmental justice, economic and developmental effects (Ge-005) (1)
- Concerns that mitigation adequately benefits all communities (Pp-003) (1)
- Outline fair mitigation throughout corridor (Pp-069) (1)
- Outline fair mitigation throughout corridor (Pp-071) (1)
- Concerns that the SDEIS fails to meet the legal requirements of Executive Order 12898 (1)

4.2 - Water Resources

- Comments on groundwater issues (Wq-001) (1)
- Requirements for any outfall/stormwater structures or involve work in the river or adjacent wetlands (Wq-002) (1)
- Report corrections needed (Wq-003) (3)
- Concerns in regard to conflicts with storm drainage pipes (Wq-004) (1)

4.6 - Air Quality

- Reducing carbon emissions should be a goal (Aq-001) (1)
- Air quality hot spot analysis for selected intersections needs to be re-evaluated (Aq-002) (1)
- Identify five intersections that are proposed for further air quality analysis (Aq-003) (1)
- Report clarifications/corrections needed in regard to regional emissions and air quality analysis (Aq-004) (1)
- How will "excessive emissions" be determined? (Aq-005) (1)
- Coordinate traffic mitigation analysis with the Mn/DOT Metropolitan District (Aq-006) (1)
- Identify five intersections that are proposed for further air quality analysis (Aq-007) (1)
- Air quality analysis should be performed for more than just the five worst-case intersections (Aq-008) (1)

4.7 - Noise

- Concerns that MPR's recording studios is not listed as a Category I land use, and concerns about noise and vibration impacts to MPR recording studios and concert halls (Noi-001) (1)
- Report corrections/clarifications needed in regard to vibration (Noi-
Concerns in regard to noise and vibration impacts and mitigation (Noi-003) (12)
Concerns in regard to electromagnetic field and utilities impacts and mitigation (Noi-004) (4)
Report corrections/clarifications needed (Noi-005) (2)
Not in favor of selection of maintenance facility location (Noi-006) (1)
Need to determine impacts and mitigation for University's NMR magnets' sensitivities to specific frequencies (Noi-007) (1)
Concerns in regard to noise and vibration impacts (Noi-008) (1)
Detailed noise impact analysis is needed (Noi-009) (1)
Concerns about noise and vibration impact to Central Presbyterian Church (Noi-010) (1)
Concerns about noise impacts to sensitive noise receivers (Noi-011) (5)
Concerned that there is proper maintenance, monitoring, and review of noise mitigation (Noi-012) (1)
Concerns about noise around tight curves (Noi-013) (5)
Concerns about noise at change in alignment at east side of Cedar Street (Noi-014) (1)
Recommended noise mitigation measures (Noi-015) (1)
Concerns in regard to noise impacts on church worship services (Noi-016) (1)
Concerns about maintenance facility noise impacts to National Park and nature sanctuary (Noi-017) (1)
Concerns about vibration impacts (Noi-018) (7)
Concerns about vibration impacts (Noi-019) (4)
Concerns about noise impacts on sanctuary environment (Noi-020) (1)
Need clarification in regard to impact of warning bell sounds on sensitive noise receivers (Noi-021) (1)

4.9 - Hazardous/Regulated Materials

Hazardous/Regulated materials analysis and required mitigation (Ge-001) (1)

4.10 - Electromagnetic Fields, Utilities and Distribution Systems

Utility impacts (Ci-003) (1)
District Energy utility impacts (Ci-004) (1)
District Energy utility impacts (Ci-005) (1)
Utility Impacts (Ci-006) (1)
District Energy utility impacts (Ci-007) (1)
Utility improvements (Lu-021) (1)

6.0 - Transportation
Central Corridor LRT Project
Comment and Response Table of Contents by Issue Area
Appendix K.5
SDEIS

- Update noted report figures and text (T-071) (1)
- Update noted report figures and text (T-072) (1)
- Update noted report figures and text (T-073) (1)

❖ 6.1 - Transit Effects

- Concerns about impact to bus system, and comments about sidewalk widths (Bp-004) (3)
- Impact to bus system (Bp-005) (1)
- Need improved bus system coordinated with LRT (Bp-006) (1)
- Support of Park and Rides for LRT (Bp-009) (1)
- Connectivity with other mass transit projects systems (existing and proposed) (Pp-025) (1)
- Concerns about changes to existing mass transit system, and related impacts especially for elderly and persons with mobility issues (T-002) (3)
- Project will benefit mass transit for handicapped and elderly (T-003) (1)
- Impact to bus system (T-004) (1)
- What is gained benefit to mass transit system between downtown Minneapolis and U of M (T-010) (1)
- Support of Park and Rides for LRT (T-019) (2)
- Support of Park and Rides for LRT (T-021) (1)
- Support of Park and Rides for LRT (T-027) (1)
- Questions ridership analysis (T-030) (1)
- Questions benefit of LRT to overall mass transit system (T-035) (1)
- Train Frequency (T-057) (1)
- Concerns about impact to existing bus system (T-068) (9)
- Reduce train speed for safety (T-070) (1)
- Further analysis/clarifications needed for traffic on U of M Transit Mall (T-076) (2)
- Reduce train speed for safety (T-084) (1)
- Include increased U of M shuttle bus system costs in project plans (T-085) (1)
- Add further discussion about character of trips to U of M (T-086) (1)
- Need improved bus system coordinated with LRT (T-091) (1)

❖ 6.2 - Effects on Roadways

- Impact to Washington Avenue Bridge (A-011) (1)
- Impact on Washington Avenue Bridge (Pp-026) (1)
- Impact and mitigation for U of M Washington Avenue Mall area (Pp-042) (1)
- Impact and mitigation for U of M Washington Avenue Mall area (T-011) (1)
Concerns about traffic impact (T-025) (8)
- Impact on traffic congestion (T-031) (1)
- Impact and design of traffic structures (Signals, etc) (T-032) (1)
- Impact on traffic congestion (T-034) (1)
- Need improved traffic analysis and discussion (T-036) (1)
- Need improved traffic analysis and discussion (T-037) (1)
- Need improved traffic analysis and discussion (T-038) (1)
- Need improved traffic analysis and discussion (T-039) (2)
- Need improved traffic analysis and discussion (T-040) (1)
- Need improved traffic analysis and discussion (T-041) (1)
- Need improved traffic analysis and discussion (T-042) (1)
- Need improved traffic analysis and discussion (T-043) (3)
- Need improved traffic analysis and discussion (T-044) (2)
- Need improved traffic analysis and discussion (T-045) (1)
- Need improved traffic analysis and discussion (T-046) (1)
- Need improved traffic analysis and discussion (T-047) (1)
- Need improved traffic analysis and discussion (T-048) (1)
- Impacts to Interstate system (T-049) (2)
- Further traffic analysis and mitigation measures are needed (T-050) (3)
- Timing of traffic mitigation measures (T-051) (1)
- Unclear report text needs to be clarified (T-052) (1)
- Need improved traffic analysis and discussion (T-053) (1)
- Update noted report figures and text (T-054) (3)
- Concerns about traffic signal preemption and impacts to vehicular traffic and LRT travel time (T-055) (2)
- Need improved traffic analysis and discussion (T-056) (1)
- Mitigation of traffic impact (T-058) (4)
- Need improved traffic analysis and discussion (T-059) (1)
- Mitigation of traffic impact (T-060) (1)
- Mitigation of traffic impact (T-061) (2)
- Mitigation of traffic impact (T-062) (1)
- Signals at Weissman Museum intersection (T-063) (1)
- Need improved traffic analysis and discussion (T-064) (1)
- Mitigation of traffic impact (T-067) (1)
- Concerned that traffic-generating events be considered in analysis, and concerns on emergency vehicle access (T-075) (3)
- Need improved traffic analysis and discussion, and analysis/clarifications of impacts to Washington Avenue bridge (T-077) (2)
- Need improved traffic analysis and discussion (T-078) (2)
- Report corrections needed (T-079) (5)
- Report corrections/clarifications needed (T-080) (5)
- Impacts to Interstate system (T-089) (1)
- Impact on traffic congestion (T-093) (1)
- Mitigation of traffic impact (T-098) (1)
6.3 - Effects on Other Transportation Facilities and Services

- Further description of bicycle and pedestrian facilities needed (Bp-001) (7)
- Comments and ideas in regard to bicycle and pedestrian facilities (Bp-002) (4)
- Impact to bicyclists (Bp-003) (1)
- Impact to bike/pedestrian facilities (Bp-007) (1)
- Impact to bike/pedestrian facilities (Bp-008) (1)
- Impacts on St. Paul pedestrian skyway (Ci-002) (1)
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- Impact to on-street parking (Pp-033) (1)
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- Concerns about parking impacts and mitigation (Pp-068) (2)
- Pedestrians and bicyclists must be included in traffic analysis and design (Saf-016) (1)
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- Concerns about impact to pedestrian street-crossings and concerns that LRT will be a barrier negatively impacting community cohesion/connectivity (T-006) (2)
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- Concerns about adequately mitigating loss of on-street parking (T-102) (1)

**8.1 - Capital Funding Strategy**

- Not in favor of project because of project cost (C&F-001) (1)
- Not in favor of project because of project cost (C&F-002) (1)
- Not in favor of project because of project cost (C&F-003) (1)
- In favor of project (C&F-004) (1)
- Concerns in regard to operation and maintenance costs (C&F-005) (2)
- Not in favor of project because of project cost (C&F-007) (1)
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- Need explanation of cost effectiveness (C&F-009) (1)
- Concerns about fees and assessments not directly related or necessary to the transit (C&F-010) (1)
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- Comply with contracting and labor laws (C&F-024) (1)
- Miscellaneous (C&F-025) (1)
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- Impact on utilities (C&F-028) (3)
- Revise noted report figures, tables and text (C&F-034) (1)
- Miscellaneous (C&F-038) (1)
- Miscellaneous (C&F-039) (1)

**11.0 - Public and Agency Coordination and Comments**

- Add details to report Table 3-1 (A-018) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-004) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-005) (1)
- Clarify and verify census, employment and other data used for calculations (Pp-006) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-008) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-009) (1)
- Unclear report text needs to be clarified (Pp-010) (1)
- Revise noted report figures, tables and text (Pp-011) (1)
- Revise noted report figures, tables and text (Pp-012) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-013) (1)
- Revise noted report figures, tables and text (Pp-014) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-015) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-016) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-017) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-018) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-019) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-020) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-021) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-022) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-023) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-027) (1)
- Public involvement and input process (Pp-028) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-029) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-030) (1)
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- Clarify and verify census, employment and other data used for calculations (Pp-034) (1)
- Project communication with interested and potentially impacted parties has not been inadequate (Pp-035) (1)
- Revise noted report figures, tables and text (Pp-036) (1)
- Clarify and verify census, employment and other data used for calculations (Pp-037) (1)
- Involve and communicate with the public and interested parties throughout project (Pp-038) (1)
- Discuss project communications with interested parties (Pp-040) (1)
- Impact and mitigation in regard to U of M campus area street traffic (Pp-041) (1)
- Concerns about unresolved issues (Pp-043) (2)
- Make list and description of unresolved issues available (Pp-044) (1)
- Revise noted report figures, tables and text (Pp-045) (1)
- Improve discussion and accuracy in figures and discussion (Pp-047) (1)
- Improve discussion and accuracy in figures and discussion (Pp-048) (1)
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- Approach to what mitigation measures can be considered (Pp-057) (1)
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- Coordinate with US Coast Guard for any modifications to Washington Ave bridge (Pp-060) (1)
- SDEIS does not adequately study and resolve unresolved issues (Pp-061) (1)
- SDEIS does not adequately study and resolve unresolved issues (Pp-062) (1)
- Coordinate with other agencies (Pp-065) (1)
- Revise noted report figures, tables and text (Pp-066) (1)
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- Transportation
- Visual Quality and Aesthetics
- Land Use and Socio-Economics
- Noise
- Cultural Resources
- Community Cohesion
- Neighborhood, Community Services, and Community Cohesion
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- Capital Funding Strategy
- Noise
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May 2009
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# Comment and Response Comment Code Index by Code

**Central Corridor LRT Project**  
**Appendix K.7**

**Final EIS**  
**K.7-2**  
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Final EIS

K.7-18

May 2009
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Comments-Responses for the SDEIS

Section: 1.0 - Agree/Disagree with Project Benefits

Issue Summary A-008. Concerned that project is not justified (1)

Comments:
(CCLRP0957) A-11
The placement of light rail transit (LRT) is simply for the personal financial interest of various politicians, government appointees, government employees, private contractors, consultants, and their various operatives. There is no reason to put LRT in a Central Corridor along University Avenue unless it is to line the pockets of those mentioned above.

Response A-008. Comment Noted. The purpose and need for the Central Corridor LRT Project is described in Chapter 1 of the FEIS.

Issue Summary T-003. Project will benefit mass transit for handicapped and elderly (1)

Comments:
(CCLRP0964) T-007
Because of the ease of boarding and alighting associated with light rail transit, the CCLRT is an attractive option for a variety of pedestrians including people with disabilities. Some may use Metro Mobility to arrive at the LRT station. Consider mobility drop off zones at points where the passenger may arrive by mobility bus. For example, passengers with disabilities may choose to be dropped of at Union Depot or the U of M as they start their travel days. A mobility zone assures that should there by a problem with the loading or unloading, other mainline buses are not caught in a queue waiting for the problem to resolve.

Response T-003. Comment Noted. Metro Transit continually evaluates the needs of transit riders, including the introduction of mobility zones to areas where they may be useful. This analysis will be done as part of evaluating final service plans prior to the start of Central Corridor LRT revenue operations.

Issue Summary T-034. Concerned that project will increase traffic congestion (1)

Comments:
(CCLRP0958) T-087
The Central Corridor Light rail does nothing to help reduce the primary congestion problem in the Central Corridor study area.

Drivers will lose time cause by prioritizing traffic signals, adding 6 traffic signals on University Avenue, manipulation of traffic signals for optimal light rail performance, reducing the lanes available for vehicles and increased congestion caused by the Central Corridor Light rail.
Response T-034. The purpose and need for the Central Corridor LRT Project is described in Chapter 1 of the FEIS. Traffic impacts are described in Chapter 6 of the FEIS.

Section: 2.3 - Selection of Locally Preferred Alternative

Issue Summary A-019. Prefers the Wacouta Mid-Block alternative (1)

Comments:
(CCLRP0952) A-28
The City prefers the Wacouta Mid-Block alternative, both from an LRT operations perspective as well as from a land use impact perspective

Response A-019. In response to comments received on the SDEIS and in consultation with SHPO, consulting parties and other stakeholders in the Section 106 process, an alternative to avoid impacts associated with the Mid-Block Wacouta alternative was developed. This alternative is the Preferred Alternative disclosed in the FEIS and is discussed in concept in Chapter 2, Alternatives Considered.

Issue Summary Lu-006. Wacouta Mid-Block alternative concerns (1)

Comments:
(CCLRP0985) Lu-09
The Wacouta option takes away several developable parcels of land adjacent to the depot.

Response Lu-006. The Wacouta Mid-Block alternative is not part of the Preferred Alternative.

Section: 2.3 - Alignment Concerns

Issue Summary A-002. Concerns in regard to alignment in downtown St. Paul (2)

Comments:
(CCLRP0977) A-02
The proposed line misses an opportunity to serve St. Paul. It comes to the middle of a congested downtown. If it were to travel Kellogg Blvd, after crossing Int 94, it could serve; St Paul Cathedral, MN History Museum, Transit center, River Center of Xcel, Roy Wilkins, Ordway, Conference of Visitor bureau, Library, City Hall, Ramsey Gov't Center, Hotels, General Courts, School, Public TV. United Hospital, Science Museum,. Also the street is a blvd, with a center medium. Please reconsider.

(CCLRP0961) A-03
Instead, I wish that planners had considered locating the tracks on portions of Kellogg Blvd. Mimicking the success in LRT in Minneapolis, St. Paul LRT could serve a higher number of people who want to ravel to the Xcel, the River Center, the Ordway, and numerous hotels as
well as providing good access to government include St Paul City Hall, Ramsey County Government Center, and the courts.

Response A-002. Alternative alignments serving these areas were considered, however they were not selected because they did not provide the best combination of cost, good ridership, and service to downtown St. Paul. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment that meets the purpose and need most efficiently and minimizes project impacts.

Issue Summary A-003. Concerns in regard to alignment in downtown St. Paul (1)

Comments:
(CCLRP0961) A-04
At the minimum, the LRT tracks should be in the center of Cedar Street to give Central access to the city street and possibly reduce some of the noise from the trains. However, I suggest that this is even a mistake. I can only imagine how construction will cause deep chaos to the middle of St Paul's downtown.

Response A-003. The LRT tracks on Cedar Street in St. Paul were placed on the east side of the street to minimize disruptions to access and right-of-way takings. A description of the route of the Preferred Alternative is in Chapter 2. Effects of the Preferred Alternative on the Downtown St. Paul planning segment land uses and neighborhood during and after construction and proposed mitigation are discussed in Section 3.2. Traffic effects and proposed mitigation during and after construction are discussed in Chapter 6.

Issue Summary A-004. Prefers different alignments (2)

Comments:
(CCLRP1004) A-05
2. New Hiawatha connection: the proposed route change to connect the Central Line to the Hiawatha Line cuts through a significant developable parcel and interferes unnecessarily with a potential connection between 15th Avenue and the new Washington Parkway.

(CCLRP1022) A-06
Or put it on 94, which is supposed to be an ideal location, or down Energy Park rail systems because it would be more comp -- more beneficial for everyone.

Response A-004. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment that meets the purpose and need most efficiently and minimizes project impacts.
**Issue Summary A-005. University of Minnesota Alignment (1)**

**Comments:**
(CCLRP0969) A-07
S.2.4.4 S-8 Key Project Elements - University of Minnesota Alignment
The Washington Avenue Mall should extend from approximately the Washington Avenue Bridge (Pleasant Street) to Walnut Street.

**Response A-005.** The Preferred Alternative includes a pedestrian/transit mall along Washington Avenue between Pleasant Street and Walnut street. The FEIS has been updated to reflect this.

**Issue Summary A-007. Need discussion of alignment near the Capitol (1)**

**Comments:**
(CCLRP0965) A-10
There is no mention of the issue with the alignment near the Capitol and the proposed trench.

**Response A-007.** Portions of the alignment near the Capitol will be in a shallow trench. Details of the LRT alignment in this area are discussed in Section 2.2 of the FEIS.

**Issue Summary A-010. Prefers different alignments (1)**

**Comments:**
(CCLRP0997) A-14
We would strongly prefer that the realignment of the LRT be changed so as to not take our building or parking lot.

**Response A-010.** The diagonal alignment through the 4th/5th and Minnesota/Cedar block was selected in the Preferred Alternative. This alignment option is also consistent with the City of St. Paul's Central Corridor Development Strategy. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment that meets the purpose and need most efficiently and minimizes project impacts.

**Issue Summary A-012. Need more discussion of Northern Alignment (3)**

**Comments:**
(CCLRP0969) A-16
Other Key Project Elements Determined Through the On-Going Decision-Making Process to Have Potential Significant Impacts to Human and Natural Environments
The reader would benefit from a more complete description of the Northern Alignment, including key dates and the process of agreement between the Metropolitan Council and the University permitting the University to conduct the study.
S.2.2 S-5 Alternatives Evaluated in the AA/DEIS
This discussion does not explain how the Northern Alignment was evaluated and the reasons for its dismissal during the scoping process.

Discussion of the University of Minnesota alignment does not include exploration of the Northern Alignment and the decision to proceed with the Washington Avenue alignment during the more recent process.

Response A-012. Alignment options, including the Northern Alignment, were detailed in Chapter 2 of the SDEIS. The entire Northern Alignment Feasibility Study, including key correspondence between stakeholders, was detailed in Appendix G of the SDEIS. This alternative was screened from further analysis because it did not best meet the project purpose and need.

Issue Summary A-016. University of Minnesota Alignment (3)

Comments:
(CCLRP0969) A-23
Central Corridor LRT Project Description
The Washington Avenue Mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.

(CCLRP0969) A-24
University of Minnesota Alternatives
Transit mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.

(CCLRP0969) A-25
University of Minnesota Alignment - East Bank The Washington Avenue Mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.

Response A-016. The Preferred Alternative includes a pedestrian/transit mall along Washington Avenue between Pleasant Street and Walnut street. The FEIS has been updated to reflect this. Final details of the specific type and location of the station platforms will be determined during final engineering.

Issue Summary A-022. Concerns in regard to alignment in downtown St. Paul (1)

Comments:
(CCLRP0952) A-31
• The City concurs with the relocation of the Rice Street Station to the new site and configuration.
• The City concurs with the rerouting of LRT along Robert Street to 12th Street, and the
location of the Capitol East LRT station.
• The City fully supports the rerouting of the LRT, and location of the station, through the Athletic Club block.
• The City prefers the Wacouta Mid-Block alternative, both from an LRT operations perspective as well as from a land use impact perspective.
• The City recommends that a brief discussion on the alternative sites for the Vehicle Maintenance and Storage Facility be included in the SDEIS, with a statement of rationale as to why the preferred site was chosen.

Response A-022. Comments are noted on the relocation of the Rice Street Station to the new site and configuration, the rerouting of LRT along Robert Street to 12th Street, and the location of the Capitol East LRT station., and the City’s support of the rerouting of the LRT, and location of the station, through the Athletic Club block.

The Wacouta Mid-Block alternative is not part of the Preferred Alternative.

A discussion of the selection of the site for the Vehicle Maintenance and Storage Facility, now called the Operations and Maintenance Facility, or OMF, is included in the FEIS, with a statement of rationale as to why the preferred site was chosen. See Chapter 2 of the FEIS for further details.

Issue Summary T-028. Preferred route (1)

Comments:
(CCLRP0983) T-069
Considerations of adding north/south crossing of the Railroad yard would provide alternative routes and reduce the traffic along University Ave/4th Street. Crossings are proposed in the SEMI redevelopment and the Grand Rounds projects.

Response T-028. The projects discussed by the commentor are projects with a separate purpose and need as developed in plans by the respective agencies and jurisdictions.

Section: 2.3 - Grade Separation

Issue Summary A-006. Line should be below-grade or above-grade (2)

Comments:
(CCLRP0966) A-08
Toward campus safety, the line should be underground. I agree with Bob Baker. Put the rail system underground through the University of Minnesota. That is the only way to make it safe. It should be underground at Snelling and University, in downtown St. Paul, and most all of the way.
(CCLRP0956) A-09
Although a tunnel would cost more, it should be considered an investment in Minnesota's transportation infrastructure. Traffic congestion is heavy on this street and rerouting cars off of Washington Avenue will be next to impossible. If the University of Minnesota is to remain accessible to students and those who work there, a tunnel option is clearly a better option.

Response A-006. Various tunnel alternatives at the U of M were considered, however they were not selected because they did not provide the best combination of cost, good ridership, and ability to qualify for federal funding. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment that meets the purpose and need most efficiently and minimizes project impacts. Traffic and safety issues are detailed in Chapter 6 of the FEIS.

Issue Summary A-013. Line should be below-grade or above-grade (1)

Comments:
(CCLRP0969) A-19
No.2 U of M Alignment East Bank
The reader would benefit from more specific discussion of the fiscal constraints and cost-effectiveness concerns that led to the abandonment of the AA/DEIS tunnel concept.

Response A-013. Various tunnel alternatives at the U of M were considered, however they were not selected because they did not provide the best combination of cost, good ridership, and ability to qualify for federal funding. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment that meets the purpose and need most efficiently and minimizes project impacts.

Issue Summary A-014. Line should be below-grade or above-grade (1)

Comments:
(CCLRP0969) A-20
At-Grade LRT Alignment with Traffic Alternative
The description of LRT at grade with traffic does not explain why it is not a feasible alternative. The description suggests that it would function acceptably.

Response A-014. Various at-grade alternatives with automobile traffic at the U of M were considered and analyzed, however they were not selected due to concerns about impacts to automobile travel times and delay. See Chapter 2 of the FEIS.
Section: 2.3 - Station Design and Selection

Issue Summary A-015. Stations should accommodate three-car trains (2)

Comments:
(CCLRP0969) A-21
Three-Car Operations
Station platforms should be expanded to 300 feet to accommodate three-car trains.

(CCLRP0969) A-22
S-6 Stations
Station platforms should be expanded to 300 feet to accommodate three-car trains.

Response A-015. The Preferred Alternative includes 300-foot stations to accommodate 3-car trains.

Issue Summary A-027. Need further discussion of Stadium Village Station, and Snelling and University line should be below-grade (2)

Comments:
(CCLRP0969) A-40
University/Prospect Park - Add a description of the Stadium Village Station

(CCLRP0966) A-41
Toward Safety at Snelling and University, the station should be underground

Response A-027. Stadium Village Station, and all of the other stations, will be fully designed during Final Engineering. The location and station/platform type are described in Chapter 2 of the FEIS, and current engineering plans for the stations are in Appendix L: Engineering Plan Sets. Options to do major reconfigurations of the intersection of Snelling Avenue and University Avenue were presented by Ramsey County and were found unacceptable by the public. The Minnesota Department of Transportation will begin another traffic study in late 2009 to look for solutions to traffic issues at this intersection. This study is noted in Chapter 9 of the FEIS. The traffic analysis includes additional intersections and updated information. See Chapter 6 of the FEIS for details.

Issue Summary Lu-022. West Bank station planning and coordination (1)

Comments:
(CCLRP0983) Lu-04
The site along Washington Avenue should be incorporated into the West Bank Station Area Planning and coordinated with the West Bank Community Development Corporation.

Response Lu-022. The CCPO traffic engineers, outreach staff and designers worked with Minneapolis, the U of M and Hennepin County as well as community organizations to
position the West Bank Station to better serve the West Bank residential and business communities as well as maintain connections to the U of M facilities. Building on this work and collaboration, the CCPO is working to realign the entrance/exit ramps to minimize space requirements and provide space for future development. A figure of the preferred reconfiguration of the I-35W access ramps and the West Bank station area generally is included in Section 2.2 and Chapter 6 of the FEIS along with a brief description of the plan and its effects.

**Issue Summary Lu-024. Define proposed LRT platform sizes** (1)

**Comments:**
(CCLRP0969) Lu-24
Three-Car Platforms - The University-owned portion of identified right of way required for the re-car platforms needs to be further defined in terms of square feet.

**Response Lu-024.** Generally, the change from 2-car to 3-car platforms does not affect right-of-way requirements when the LRT alignment is center running, as identified through the U of M.

**Issue Summary Pp-067. Need further discussion of West Bank station** (1)

**Comments:**
(CCLRP0969) Pp-44
The proposed changes to AA/DEIS LPA column under the University/Prospect Park area should include an explanation of the proposed design for the West Bank station and surrounding area. Problems with the current design for the West Bank are: it negatively effects the regional transportation network, it creates an unsafe pedestrian environment, and it limits future building site development.

**Response Pp-067.** The location and configuration of the West Bank Station has been revised. See Chapter 2 of the FEIS and Appendix L for further details.

**Issue Summary T-033. Concerns about station placement selection** (1)

**Comments:**
(CCLRP0942) T-086
The Lexington Avenue/University intersection is the most challenged intersection for traffic. You have to wait possibly for two light changes to move through. Why not then consider putting that station at Hamlin, which is an alternate. Don't make Hamlin an alternate, make it a primary station. You won't have as much as a headache because you won't have that challenge that Lexington has.

**Response T-033.** Alternative alignments serving these areas were considered, however they were not selected because they did not provide the best combination of cost, good ridership, and service. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment
that meets the purpose and need most efficiently and minimizes project impacts. The project costs include adding infrastructure for the Hamline Ave Station as a future infill station.

**Issue Summary T-097. Favors three-car station platforms** (1)

**Comments:**
(CCLRP0952) T-197
• The City supports the construction of three-car platforms as part of the initial construction. The City supports the construction of three-car platforms as part of the initial construction

**Response T-097.** The Preferred Alternative includes the construction of three-car platforms. See Chapter 2 of the FEIS for further details.

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**Section: 2.3 - Concerns about Vehicle Maintenance and Storage Facility**

**Issue Summary A-021. More discussion in regard to reasoning for selection of preferred site for Vehicle Maintenance and Storage Facility** (1)

**Comments:**
(CCLRP0952) A-30
The City recommends that a brief discussion on the alternative sites for the Vehicle Maintenance and Storage Facility be included in the SDEIS, with a statement of rationale as to why the preferred site was chosen.

**Response A-021.** Comments noted. During the SDEIS process, several sites for the OMF were considered. The OMF site chosen in the Preferred Alternative represents the most cost effective solution that minimizes project impacts. See Chapter 2 of the FEIS for further details.

**Issue Summary Lu-005. Concerns in regard to maintenance facility location** (9)

**Comments:**
(CCLRP0992) Lu-08
Placing the facility in the proposed location would fail to capture opportunities that are in keeping with our goal- and the city's goal- of achieving sustainable communities that benefit from proximity to the Mississippi River.

(CCLRP0985) Lu-10
A maintenance facility at this particular site seems fraught with problems, conflicts with the overwhelming body of established planning direction for the area, in conflict with significant recent investment in the surrounding area, and will have serious consequences for the enjoyment of the surrounding neighborhood and natural systems.
As the City's Mississippi River Corridor Plan states, Industrial uses that don't need to be tied to the river should be located away from the river.

The future possibility for creating green connections to the River through the site will be severely diminished.

There is concern over the facility's impact on the St. Paul downtown riverfront, which has received careful attention and substantial investment over the last decades, and is part of a river-focused National Park.

The maintenance facility contradicts the intent of several key plans for downtown:
- The Downtown Development Strategy
- The City Comprehensive Plan (Mississippi River Chapter and others)
- The River Gardens Plan of 1995 (a joint City and Lowertown Redevelopment Corporation effort)
- The Urban Village Vision of 2005 (Lowertown Redevelopment Corporation)
- St. Paul on the Mississippi Development Framework
- National Great River Park Plan
- Trout Brook - Lower Phalen Greenway Plan

Vehicle Maintenance Facility - We share the concern of the Capitol River Council that the location of the vehicle maintenance facility in Lowertown could block access between Lowertown and the river.

Key Element 8. Vehicle Maintenance and Storage Facility - The DCC evaluated this location for impacts on neighborhood land use plans and the City of Saint Paul Comprehensive Plan. The DCC is concerned that the preferred site may be in conflict with the City's Comprehensive Plan and that neighborhood plans for connections to the Mississippi River may not have been given full consideration. (Capitol River Council SDEIS comments provide an extensive review.) It also does not appear that the SDEIS considered neighborhood plans for this site and the surrounding area.

The FEIS should include an analysis of the preferred site for compatibility with the City of Saint Paul's Comprehensive Plan, the Mississippi National River and Recreation Area Management Plan, and for impacts on neighborhood land use plans and connectivity to the Mississippi River, a nationally-designated resource. If impacted, appropriate mitigation strategies must be identified in the FEIS.

Response Lu-005. The Operations and Maintenance Facility (OMF) and approaches described in the SDEIS and approved through the local municipal consent process included a
mid-block Wacouta crossing of Kellogg Boulevard to the Union Depot elevated railyard, and a new OMF located on Ramsey County-owned land east of Union Depot. Since publication of the SDEIS, several significant issues were expressed by project partners and stakeholders. The concerns were associated with impacts to historic resources, specifically the Union Depot and its associated facilities, potential constraints on Ramsey County plans for a multimodal transit hub re-using the Union Depot concourse, additional project costs due to poor soil conditions identified on the site for the OMF, and being within the boundaries of the Mississippi National River and Recreation Area (MNRRRA) and the Mississippi River Critical Area (MRCA) boundary. The preferred alternative includes an operations and maintenance facility that reuses a portion of the Diamond Products site in downtown St. Paul, which avoids the significant issues of the previously considered site including being outside of the MNRRRA and the MRCA boundary. See Section 2.2 of the FEIS for further details.

Section: 2.3 - Concerns about Traction Power Substations

Issue Summary Lu-001. Impact for traction power substations (1)

Comments:
(CCLRPM0952) Lu-06
The City recommends that mitigation for the TPSs include avoidance of sites fronting on University Avenue or major cross streets, such as Raymond Avenue. Further, location of TPSs in downtown will require particular sensitivity with respect to opportunity costs - finding sites/locations that are not attractive for "higher and better uses."

The Land Use and Socioeconomic section of the SDEIS (3.1, Table 3-1, and text on pp 3-28, 29 and 32) describe the virtues of the Diagonal at 4th/Cedar Street (Athletic Club Block). However, neither the chart nor the mitigation on the Athletic Club block adequately outlines the need for maintaining a pedestrian connection through the block from the time LRT construction may impact the skyway link to the time redevelopment may be able to accommodate a replacement connection.

The section on Land Use and Socioeconomics (3.1, Table 3-1, and text on pp 3-27, 28, 32, and 54) reference the importance of selecting the least impactful sites for TPSs. However, this seems insufficient to address the issues of context and opportunity costs. The City recommendations that mitigation include avoidance of sites fronting on University Avenue or major cross streets, such as Raymond Avenue. Further, location of TPSs in downtown will require particular sensitivity with respect to opportunity costs - finding sites/locations that are not attractive for "higher and better uses."

The City supports the coordination among the City, Metropolitan Council and Metropolitan Airports Commission as potential zoning code amendments are being considered and drafted.

It is not clear that the Vehicle Maintenance and Storage Facility would have a deleterious impact on the air rights above the platform.
Response Lu-001. To limit the number of impacts, efforts have been made to select underutilized parcels for the TPSS, such as surface parking lots or vacant land, thereby preventing the demolition of any structures or the modification of land use in the corridor. Further, 4 of the 12 TPSS will be incorporated into LRT station locations or the OMF and so as not to affect separate parcels. See Chapter 2 for TPSS locations. Text was added to Section 3.2 explaining that a temporary skyway connection will replace the connection lost due to the construction of the diagonal alignment through the Athletic Club block. Although a specific plan has not yet been established to mitigate this loss, the Metropolitan Council and the City of St. Paul adopted a resolution to find a solution before final design. Section 3.1 of the FEIS describes how the location of OMF is affected by the airport zoning.

Issue Summary Lu-016. Impact of traction power substations (2)

Comments:
(CCLRP0983) Lu-17
The FEIS should disclose the final locations of each TPSS and detail mitigation strategies for all impacts at street level and from above.

(CCLRP0983) Lu-18
The FEIS should disclose whether alternative locations for the TPSSs are available, why these particular locations are desired, what impacts these TPSSs will have, and what mitigation strategies will be employed in the short (construction) and long term.

Response Lu-016. The FEIS identifies preferred and alternate locations for the traction power substations. Confirmation of the final locations for the traction power substations will require coordination with the local property owners. The FEIS identifies conceptual mitigation strategies. Development of detailed mitigation plans for the traction power substations will be completed during final design.

Issue Summary Lu-020. Concerns in regard to traction power substation locations (1)

Comments:
(CCLRP0983) Lu-21
The DCC notes that TPSS locations between Lexington Avenue and Rice Street are spaced much closer than required. There are Environmental Justice populations in this area and the development pattern is more fined grained and residential in nature.

The SDEIS does not adequately discuss the impacts in light of stations at Western, Victoria, and Hamline not being built-out until some unknown future date.

Response Lu-020. The Metropolitan Council evaluated future infill stations at Hamline Avenue, Western Avenue, and Victoria Street to address community access and mobility issues in the Midway East Segment and to respond to community concerns regarding station spacing. This analysis analyzed including these stations as part of the current project. The analysis is discussed in SDEIS Section 3.8.4.2. The Preferred Alternative discusses the potential locations for TPSS in Midway East. All of the locations are at cross streets to
University Avenue. In each case, efforts have been made to locate the TPSS only on underutilized land, such as surface parking lots and away from University Avenue to allow for development to occur along the alignment. Confirmation of the final locations for the traction power substations will require coordination with the local property owners. By selecting underutilized parcels, the TPSS will not adversely affect residential neighborhoods, commercial streetfronts along University Avenue, or the pedestrian realm. The FEIS also identifies conceptual mitigation strategies. Development of detailed mitigation plans for the TPSS will be completed during final design.

**Issue Summary Pp-056. Further analysis needed in regard to traction power substations (1)**

**Comments:**

(CCLRP0952) Pp-23

- The City understands and accepts the requirement that such TPSs be located approximately every mile, and within 500' of the LRT alignment. The City needs to be intimately involved in the location, design and landscaping of these 9 TPSs.
- The City believes that greater specificity is needed as to the criteria for designing and landscaping the TPSs. First, there should be at least a menu for possible cladding materials for such facilities. Second, there should be standards set for landscaping techniques. Third, especially for downtown and the Raymond area, possibilities of such facilities being incorporated into existing or future larger buildings should be explored.
- The City suggests acknowledging the need to do further analysis during the Preliminary Engineering phase in downtown St. Paul and on University Avenue east of Marion Street with respect to property access.

The City recommends that the following elements be considered in development of a mitigation program for the loss of on-street parking, whereby, the City and Metropolitan Council staff will work with affected property owners and tenants to maximize parking on and near University Avenue. And that the City and Metropolitan Council staff will work together over the next two months to estimate costs and apportion them between the City and the project in an equitable manner. The elements include: Elements of this program should include:

1) Management system for on-street parking including installing parking meters on side streets in the station areas;
2) Installing new meters along University Avenue where parking remains;
3) Developing comprehensive signage for all on- and off-street public parking facilities, including time limit parking for one block either side of University Avenue on all secondary cross streets;
4) Developing shared public, off-street parking lots (generally by reuse of existing inefficient off-street parking);
5) Developing corridor-wide permit parking; and
6) Considering off-peak parking on University Avenue.

The City recommends that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase, and encourages active community engagement, including working with Public Art Saint Paul.
Response Pp-056. Comments noted in regard to the need to locate TPSS located approximately every mile, and within 500' of the LRT alignment. A discussion of the function and design of traction power substations required for the Central Corridor LRT project is found in Chapter 2 of the FEIS, in addition to the planning and consultation process that led to the identification of sites for their placement.

Metropolitan Council acknowledges that the City of St. Paul needs to be intimately involved in the location, design and landscaping of the 9 TPSS located in the City, and that the City desires greater specificity as to the criteria for designing and landscaping the TPSS. The Council also understands the City’s desire for further analysis during the Preliminary Engineering phase in downtown St. Paul and on University Avenue east of Marion Street with respect to property access. As advanced preliminary engineering and final design commences, TPSS identified as being located in either visually or culturally sensitive locations will be considered for additional screening and other treatments to integrate them appropriately with their surrounding context.

Metropolitan Council will work with the City on a mitigation program for the loss of on-street parking, that will include working with affected property owners and tenants to maximize parking on and near University Avenue, including estimating costs and apportioning them between the City and the project in an equitable manner. Parking issues and mitigation commitments are outlined in Chapter 6 of the FEIS.

Metropolitan Council recognized the City’s recommendation that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase, and within an active community engagement, including working with Public Art Saint Paul. The project will include $3 million in public art, which will be incorporated into the new stations. It is intended that three to five artists will work with the community to develop public art for integration into station designs. Selection of the artists was based on artistic merit, maintainability, durability, appropriateness for local climate, and public involvement. Members of the public are being asked to serve on station art committees to work with the artists to ensure that the art at the station reflects the neighborhood. The 13 LRT station art committees will advise the five artist teams on the culture and history of the community. The committees will assist the Metropolitan Council and its Central Corridor Project Office in planning and promoting public art meetings with the community.

Section: 3.1 - Land Use and Socio-Economics

Issue Summary A-009. Impact to developable parcel (2)

Comments:
(CCLRP1009) A-12
But we also oppose the new alignment connection between the central corridor and the
Hiawatha line because it is -- it's routed right through a potential very useful, developable parcel, that if it were part of the future development around the station would provide a lot more benefit to the community and to the City and to the line in general. So in combination with the present design which shows the diamond intersection at Cedar and Washington continuing to be in place, which is a big waste of land we think. This new connection to the Hiawatha corridor is also not a wise use of land. We oppose the use of that.

(CCLRP0983) A-13
The SDEIS recommends alignment option 303 as the best strategy for improving LRT operations and the physical connection with the Hiawatha LRT line. However, this exact alignment bisects a large parcel of land between 15th and Cedar Avenues that the Cedar-Cedar-Riverside community seeks to redevelop as part of their efforts to re-establish community cohesion in the aftermath of freeway construction. (See Attachment B)

Response A-009. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. In the Preferred Alternative, the location of the West Bank Station for the Preferred Alternative was moved slightly to the west of the location described in the SDEIS—in response to comments from the public—to provide improved access to the community along Cedar Avenue. In addition, the SDEIS location of the access ramps to Washington Avenue from I-35W was revised in response to public comments to improve development opportunities near Cedar-Riverside, and facilitate creation of communities in that area. All LRT elements will be placed within an existing trench, ensuring access from the 19th Avenue and Cedar Avenue bridges and maintaining a barrier-free visual connection to people above the trench.

Issue Summary Lu-003. Utilization of land near West Bank Station (3)

Comments:
(CCLRP1004) Lu-01
The revised connection with the Hiawatha Line and the wasteful roadway design surrounding the Cedar Avenue Station squander the opportunity for new real estate development around the station and greater connectivity across the dismal divide presently known as the Washington Avenue Trench.

(CCLRP1004) Lu-02
1. The Cedar Avenue diamond intersection ramps: The proposed reduction in size and character of Washington Avenue as it crosses the Washington Avenue Bridge and goes into downtown offers an opportunity to dispense with the freeway-like design of the interchange between Washington and Cedar Avenues. The ramps off of Cedar where designed for high volume, high speed traffic. The new two lane "parkway" that Washington will become could be served by a more urban intersection with much less roadway surface. If, for example, the proposed ramps east of Cedar were two-way rather than one-way, the ramps west of Cedar could be completely eliminated. This would free up significant land in a key strategic location within crawling distance of the LRT station.
West Bank Area   The Hiawatha LRT connection reviewed in the SDEIS requires the southwest ramp to Cedar Avenue from Washington Avenue to be reconstructed. The preliminary engineering process also has identified the need to modify the other ramps to Cedar Avenue in order to accommodate the station at 19th Avenue. These roadways are being reconstructed in such a way that will preclude future development in the area around the station. The municipal consent design of the road connections in the southeast quadrant of Cedar Avenue and Washington Avenue will create confusion and operational problems. This area has not been addressed in any of the traffic studies or in the SDEIS. As stated in the memorandum of understanding between project partners, the west bank station area must be redesigned to accomplish traffic calming, safe interactions of pedestrians, and creation of developable parcels.

Response Lu-003. Opportunities to reconfigure the roadway design in the area around the West Bank Station were explored with project partners and stakeholders in response to SDEIS comments received. A figure of the preferred reconfiguration of the I-35W access ramps and the West Bank station area generally is included in Section 2.2 and Chapter 6 of the FEIS along with a brief description of the plan and its effects.

Issue Summary Lu-025. Further define right of way requirements (1)

Comments:
(CCLRP0969) Lu-25
U of M/Prospect Park - U of M Alignment. …The University-owned portion of identified right of way required for the project needs to be further defined in terms of square feet. This should address whether the identified portion includes the University Transitway's right of way.

Response Lu-025. The FEIS identified proposed right-of-way requirements in more detail based on the current design information. Right-of-way requirements will continue to be refined through final design. Metropolitan Council will continue to coordinated right-of-way issues with the University. Right-of-way information is available in Section 3.3 of the FEIS.

Issue Summary Lu-027. Include identified future U of M development (1)

Comments:
(CCLRP0969) Lu-27
University of Minnesota   Future on-campus development will occur; five new biomedical research buildings and supporting infrastructure are planned and funded for the East Gateway District in the immediate future. Additional development is expected to occur over the next 20 years.

Response Lu-027. Text addressing the commenter's concerns was added to Section 3.1 and Chapter 9 of the FEIS.
Section: 3.1 - Concerns about Impact to Taxes

Issue Summary C&F-014. Property taxes (3)

Comments:
(CCLRP0958) C&F-17
Property values will increase and have an adverse effect upon low income individuals, families and many small businesses. Even if property values remained unchanged the larger tax subsidy will adversely affect them.

(CCLRP0965) C&F-18
Freeze property taxes, excepting inflation increases, for a period of 10 years for existing owners or uses.

(CCLRP1022) C&F-19
and I can see that our taxes are going to go up. Since the Hiawatha went into effect, my property taxation on public transit has gone up three times, and I don't feel that the people can afford this.

Response C&F-014. Increased access brought by transit improvements may act as a catalyst for new investment in the area surrounding stations. Land development and property taxation policies are principally the responsibility of the cities of Minneapolis and St. Paul, but Metropolitan Council has taken every effort to minimize adverse impacts of the Preferred Alternative while maintaining the positive benefits this project would deliver. In anticipation of changes in land use, St. Paul adopted the Central Corridor Development Strategy (October 2007). The strategy contains an Inclusive Housing strategy that is intended to mitigate the potential displacement of low-income individuals and families from the corridor as property values rise and home ownership assistance. These are discussed in Chapter 3 of the FEIS.

Issue Summary C&F-020. Parking and property taxes (1)

Comments:
(CCLRP1022) C&F-24
People have said that they don't want them, and they were going to lose their parking spots in front of their businesses down University, and if they do that, they're going to close up, our taxes are going to go through the roof, and I don't believe that the property taxation department is going to increase our values because we're close to light rail.

Response C&F-020. University Avenue will retain 175 of its 1,150 on-street parking spaces after 675 spots are removed to make way for mandatory elements. Project studies show 560 on-street parking spaces are available on north-south cross streets within a block of the corridor and 15,300 off-street parking spaces are available within one block of University Avenue. See the City of St. Paul's parking strategies on the www.centralcorridor.org site.

Land development and property taxation policies are principally the responsibility of the cities of Minneapolis and St. Paul, but Metropolitan Council has taken every effort to
minimize adverse impacts of the Preferred Alternative while maintaining the positive benefits this project would deliver. Outreach coordinators have gone door-to-door to survey businesses about their parking needs. The Preferred Alternative will provide increased mobility to both residences and businesses within the Central Corridor and is expected to support future growth. New transportation capacity could create competitive advantages for businesses located in the corridor. See Chapter 5 for anticipated economic effects.

The Central Corridor Partnership, an alliance of St. Paul and Midway area business leaders, will be providing assistance to help businesses with marketing strategies and business planning to survive the construction process and let their customers know they are still open. The partnership is developing a business management plan and seeking funding sources. The Central Corridor LRT Project will be handling construction, which includes providing information about detours, signage, etc.

**Issue Summary Np-004. Concerns in regard to property tax increases (1)**

**Comments:**
(CCLRP1016) Np-14
The neighborhoods along the route will need protection from tax increases related to increased land value.

**Response Np-004.** Land development and property taxation policies are the responsibility of the cities of Minneapolis and St. Paul. Both cities have adopted comprehensive land use and development strategies or are updating plans and policies to reflect projected land use development changes that are likely to occur with the construction and operation of the Central Corridor LRT project., The St. Paul Central Corridor Development Strategy and the Minneapolis Plan for Sustainable Growth attempt to mitigate the effects of these market forces. These plans are discussed in Chapter 3 of the FEIS.

**Section: 3.1 - Zoning**

**Issue Summary Lu-002. Report corrections in regard to zoning issues (1)**

**Comments:**
(CCLRP0952) Lu-07
P 2-37, Land Use, Consistent with Zoning: the Maintenance and Storage Facility site will require a rezoning.

P 3-3, Table 3-1, Vehicle Maintenance and Storage Facility, add: "Will need to comply with Sec. 68.400 of the Zoning Code, River Corridor Standards and Criteria. It is also in the RC4 River Corridor Urban Diversified Overlay District."

P 3-29, Vehicle Maintenance and Storage Facility, second paragraph: needs a citation for Airport Zoning.
Response Lu-002. Text addressing the commenter's concerns was added to Section 3.1 of the FEIS, which describes the zoning of the OMF in relation to the City's regulations and the airport.

Issue Summary Lu-014. Zoning concerns (1)

Comments:
(CCLRP0965) Lu-16
Prohibit re-zoning for a period of at least 10 years following the completion of construction.

Response Lu-014. Zoning and the timing of rezoning are the responsibility of the municipalities not the Metropolitan Council. St. Paul, however, has begun to establish Transit Opportunity Zone overlay districts (TOZ), which, generally, promote and facilitate desired change or improvement through redevelopment and rehabilitation activities.

Issue Summary Lu-030. Selection of vehicle maintenance facility and zoning concerns (1)

Comments:
(CCLRP0974) Lu-30
- 2-19 (Vehicle Maintenance and Storage Facility) - The SEMI location for the vehicle maintenance and storage facility may not be consistent with the SEMI Master Plan.
- 3-21 - Under 3.1.2.5, land uses and zoning in the West Bank/Cedar Riverside area are not summarized.
- 3.3-21 - Under 3.1.2.6, it is a generalization to say that zoning around the Metrodome allows for light industrial uses. While some of this zoning still exists, the City did a comprehensive rezoning in this area and the rest of downtown to allow for transit-oriented development near the transit stations.

Response Lu-030. The Preferred Alternative selected a downtown St. Paul site for the Operations and Maintenance Facility (see Chapter 2). Text addressing the commenter's other concerns about zoning descriptions were added or modified in the FEIS (see Section 3.1).

Section: 3.2 - Neighborhood, Community Services, and Community Cohesion


Comments:
(CCLRP0985) A-29
The Broadway option goes right by one end of the Farmer's Market, which seems to create unwise conflicts between tightly-packed crowds of people several days a week, and passing trains. Any mitigation to help avoid conflict between these groups, such as fencing, is likely to further detract from the market environment.
Response A-020. This alternative is no longer under consideration. The Preferred Alternative, as disclosed in the FEIS, would not have revenue service trains passing by the St. Paul Farmer's Market. The Preferred Alternative alignment in this portion of downtown St. Paul is described in Chapter 2, Alternatives Considered, and potential transportation impacts are discussed in Chapter 6, Transportation Effects.

Issue Summary Ci-013. Minimize impacts to U of M (1)

Comments:
(CCLRP0969) Ci-13
Mitigation - Short Term - Construction will need to be scheduled in coordination with the University to accommodate teaching and testing schedules and other University events and research that may be impacted by noise, vibration, and electromagnetic interference.

Response Ci-013. Comment noted. There will be an intensive effort to work closely with U of M stakeholders to develop a construction plan that accommodates, to every extent possible, the teaching and research testing schedules on campus.

Issue Summary Ge-008. Concerned that many impacts were not addressed (3)

Comments:
(CCLRP0969) Ge-08
Table S-1 summary statements fail to capture many important impacts on the University and surrounding neighborhoods that occur with the LPA changes documented in the SDEIS. These impacts include traffic, cultural resources, pedestrian and bicycles, business takings/relocations, and pedestrian/bicycles as well as indirect and cumulative impacts related to these topics.

(CCLRP0983) Ge-10
Cumulative effects regarding traffic, parking, bicycle and pedestrian access and safety, neighborhood appearance and character, and short length bus service are not addressed in sufficient detail to allow decision-makers to determine if there are significant impacts related to the development of the Central Corridor Light Rail Transit project when considered in conjunction with other past, present, and reasonably foreseeable future actions.

The FTA and other Federal agencies' are required to address and consider direct, indirect, and cumulative effects in the NEPA process as established in the Council of Environmental (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR§§1500-1508).

(CCLRP0983) Ge-11
Although the SDEIS identifies numerous current and future projects that would contribute to cumulative effects (Table 9-2), the analysis does not clearly identify how these actions are incorporated in the analysis of impacts on individual resources, in particular those that affect the human community-traffic, parking, bicycle and pedestrian access and safety, neighborhood appearance and character, and short length bus service. The SDEIS does not
address, in sufficient detail, impacts from the past, present or reasonably foreseeable future projects that may interact with the project in such a way as to cause cumulative potential effects, such as the SEMI, Granary Road, Grand Rounds including the bridge over the railroad to the Como Area, stadiums (the Gopher Stadium will be used for classes and administration offices as well as games), the bio-complex, Marcy Holmes redevelopment along the river, Sydney Hall and Dinkydome (198 units, 13 stories, plus commercial) Campus Crossroads (177 units, 9 stories, plus commercial), Weissman Museum Expansion, other projects as listed in Table 9-2, and the numerous other developments and projects.

Response Ge-008. The SDEIS was principally focused around the nine key project elements. Throughout the preliminary engineering and final engineering phases of the project, it is foreseeable that additional environmental issues will be encountered. These will be appropriately responded to during the course of the project. The FEIS includes a discussion of all known environmental issues and impacts at the time of publication.

Issue Summary Ge-013. Concerns about placement and mitigation for TPSS (1)

Comments:
(CCLRP0969) Ge-15 University/Prospect Park - University of Minnesota Alignment - Placement of the on campus traction power substations (TPSS) needs to be determined and shared with the University. Any mitigation required as a result of the TPSS placement needs to be determined as well.

Response Ge-013. The final location of the traction power substation within the University/Prospect Park segment will require coordination with the University if any of their property is required or if installation would impact University facilities. The FEIS identifies conceptual mitigation for the traction power substations. Development of detailed mitigation plans for the traction power substations will be completed during final design.

Issue Summary Np-001. Must address overall community impact (1)

Comments:
(CCLRP0952) Np-06 • In the section on Neighborhoods, Community Services and Community Cohesion (3.2, and text on pp 3-33, 34, 35, 55 and 57) the issue concerning a loss of parking is mentioned. But there is little mention of the potential overall community impacts. In Chapter III, #8 there is a discussion as to the potential community impacts and comparison among alternative sites.

Response Np-001. The Central Corridor Project Office surveyed businesses and conducted an analysis of on-street parking impacts. An inventory of University Avenue parking supply and impacts is summarized in Section 6.3 of the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or
underutilized existing parking lots. This information has been added to the text of the FEIS.

**Issue Summary Np-006. Concerns in regard to preserving existing community** (1)

**Comments:**
(CCLRP1013) Np-08
The project plans need to have clear commitments to invest in supporting and preserving the existing community. This includes the neighborhood residents and the small businesses that define the character and the identity of the area and reflect the diversity of the community.

**Response Np-006.** Preserving an enhancing community character through public infrastructure investment is a key consideration of the Metropolitan Council, the Central Corridor LRT project, and the cities of Minneapolis and St. Paul. FEIS Chapter 3 provides a detailed discussion of the existing corridor environment and how the project intends to improve upon existing conditions.

**Issue Summary Np-011. Concerns in regard to lack of proposed mitigation** (1)

**Comments:**
(CCLRP0965) Np-07
Equally, your document clearly states no mitigation is proposed at this time. This is unacceptable. The most your document states is that it will not reduce the traffic lanes. Again an unacceptable response.

**Response Np-011.** Mitigation commitments are made in the FEIS at a level of detail appropriate to this stage of development. Development of detailed mitigation plans for the transportation impacts will be ongoing and will be completed during final design.

**Issue Summary Pp-039. Economic benefit for whole community** (1)

**Comments:**
(CCLRP1004) Pp-62
The operational advantage of the revised connection to the Hiawatha Line should not over-ride the larger question of how well the project serves the larger public purpose of economic development. The Cedar Riverside community needs the boost in prosperity offered by the CCLRT but the resource will have to be used wisely if we hope to leverage benefits for the whole community.

**Response Pp-039.** Comment noted.

**Issue Summary Pp-053. Economic benefit for whole community** (1)

**Comments:**
(CCLRP0966) Pp-22
that it is critical to validate that the proposed Central Corridor Light rail line meets the needs of local residents, and that it would be irresponsible to proceed to the construction phase of
the project without one. As the Central Corridor project prepares to move forward into final
design, it would be irresponsible to proceed without a reality check to see if current plans,
that are largely based on earlier assumptions, remain valid today. UPDC urges that a
professional marketing company be retained to do a quantitative marketing study, using
randomly selected local residents, to determine the actual needs and demands of future light
rail riders. I viewed the June, 2008 SDEIS for the Central Corridor Line, which speaks of
meeting the needs of low income people, and does not address the needs of moderate to high
income people. I wonder if the Metropolitan Council actually wants their lines to be of value
to the general public, or would prefer to exclusively serve low income riders, grateful if a
train merely arrives.

Response Pp-053. Comment noted. There are no plans to hire a marketing consultant at the
time of publication of the FEIS.

Issue Summary Ql-005. Concerns in regard to impact of overall quality of life and
health in the community (1)

Comments:
(CCLRP1001) QI-01
There are many issues such as the impact of the loss of street parking on small businesses or
concerns about gentrification which are not significantly addressed in the SDEIS or earlier
studies. The LRT project will have a major impact on the overall quality of life in the
community and a number of these impacts are likely "social determinants of health". We call
upon the City, Ramsey County, and the Met Council to consider undertaking a major Health
Impact Assessment which will document base line conditions and track impacts before,
during and after construction. This would conform to the U.S. Department of Transportation
requirement to "Improve data collection, monitoring, and analysis tools that assess the needs
of, and analyze the potential impacts on minority and low income populations".

Response QI-005. Impacts to on-street parking are documented in Section 6.3 of the FEIS.
Community cohesion is discussed in Section 3.2 of the FEIS. A Health Impact Assessment
is not within the scope of this project.

Issue Summary T-016. Impact to hospital access (1)

Comments:
(CCLRP0946) T-027
We want to ensure and make the formal request here that those mitigation efforts continue to
be considered, carried as part of the project. We feel very important specifically for our
patient flow throughout, that people can access the clinic and hospital as easily as possible
given the changes that are being proposed to Washington Avenues.

Response T-016. The Memorandum of Understanding between the University of Minnesota
and the Metropolitan Council details the mitigation effort and commitments for the East
Bank Campus and surrounding area. These mitigation efforts will ensure adequate access for
the public to all of the facilities in the area. Furthermore, emergency vehicles will have full
access to Washington Avenue, the U of M campus, and the Transit/Pedestrian Mall. See Chapter 6 and Appendix J of the FEIS for further details.

**Issue Summary T-092. Maintain access to Ecolab's loading dock**

**Comments:**  
(CCLRP0985) T-191  
It will be important to maintain access to Ecolab's loading dock.

**Response T-092.** Access to Ecolab's loading dock will be maintained.

**Section: 3.2 - Community Cohesion & Connectivity Concerns (LRT will be barrier...)**

**Issue Summary Np-009. Concerns about impact of TPSS on neighborhood cohesion**

**Comments:**  
(CCLRP0965) Np-16  
Further your document states "specific sites have not yet been identified but the TTPS are not anticipated to have adverse effects on neighborhood cohesion." Do you live here? What about the visual design, fencing which could be unattractive, especially in residential area? And since you have no public process identified, what is it?

**Response Np-009.** Traction power substations (TPSS) are power conversion substations regulating the electrical current necessary for the train to operate. Access to these facilities is limited to experienced personnel and these facilities are not publicly accessible. The FEIS identifies preferred and alternate locations for the traction power substations in Chapter 2, and the effects and proposed mitigation that may be required are discussed in many sections of Chapter 3 and Chapter 4. Confirmation of the final locations for the TPSS will be coordinated with local property owners. Development of detailed mitigation plans for the TPSS will be completed during final design. TPSS locations were shared with the public during the FEIS open house events in December 2008, and with the BAC, CAC, and other meetings open to the public.

**Issue Summary Np-014. Concerns that station location will impact community cohesion**

**Comments:**  
(CCLRP0983) Np-13  
The FEIS should: Identify station and station area design strategies that address the loss of community cohesion as a result of shifting the station east of Rice Street and orienting it to Leif Erikson Lawn.

**Response Np-014.** As noted in the FEIS (Chapters 3 and 5), the City of St. Paul has begun to establish Transit Opportunity Zone overlay districts (TOZ), which, generally, promote and
facilitate desired change or improvement through redevelopment and rehabilitation activities. Each TOZ will have a City TOZ team to implement policy directions, work with developers to optimize the development potential of strategic sites; prepare future station area plans; and coordinate, consult, and communicate with area residents, businesses, and stakeholders to maintain as much as possible the diversity and uniqueness of each neighborhood. Additionally, increased access brought by transit improvements may act as a catalyst for new investment. St. Paul adopted the Central Corridor Development Strategy (October 2007). The Rice Street Station is described in Section 2, and station area development potential is described in Chapter 5.

In addition, the project will include $3 million in public art, which will be incorporated into the new stations. It is intended that five artists will work with the community to develop public art for integration into station designs. Members of the public are being asked to serve on station art committees to work with the artists to ensure that the art at the station reflects the neighborhood. The 13 LRT station art committees will advise the five artist teams on the culture and history of the community. The committees will assist the Metropolitan Council and its Central Corridor Project Office in planning and promoting public art meetings with the community.

**Issue Summary Np-015.** Full analysis of community cohesion impacts and proposed mitigation measures is needed (1)

**Comments:**
(CCLRP0983) Np-01
What is not well disclosed are the impacts on community cohesion caused by the alignment disrupting and in some instances severely impeding use of the main entry of the churches for ceremonies, such as funerals and weddings. The DCC understands that many of the environmental and transportation impacts have been satisfactorily mitigated, however, impacts on community cohesion have yet to be resolved. The FEIS must fully analyze and disclose community cohesion impacts and document mitigation or other strategies developed to address the impacts.

**Response Np-015.** Neighborhoods are identified and the characteristics of Central Corridor communities are described in Section 3.2 of the FEIS. The FEIS also identifies impacts and perceived impacts to these neighborhoods and communities and describes proposed mitigation. To help maintain good community interaction and cohesion, construction of the LRT will improve the existing pedestrian infrastructure along University Avenue, and improve the safety of pedestrians. Pedestrians will be able to safely cross at intersecting streets where curb improvements and pedestrian islands within the street will shield them from both LRT vehicles and automobile traffic. Crossings will be available throughout the corridor, at both signalized and non-signalized intersections. Landscaping enhancements along the LRT alignment including trees and public furniture will enhance the street scene in each area, and help to separate pedestrians from automobile traffic. Both cities have also implemented policies to ensure that area residents, businesses, and stakeholders are involved in new development proposals so that each neighborhood’s unique characteristics are maintained as much as possible. In addition, the project will include $3 million in public art,
which will be incorporated into the new stations. It is intended that five artists will work with the community to develop public art for integration into station designs. Members of the public are being asked to serve on station art committees to work with the artists to ensure that the art at the station reflects the neighborhood.

**Issue Summary Np-016.** Full analysis of impacts and proposed mitigation, are needed for preserving community cohesion and diversity (2)

**Comments:**
(CCLRP0983) Np-02
There also are potential community cohesion impacts if the Southeast Asian business community is dispersed due to financial hardships caused by the CCLRT project. The larger Southeast Asian community would no longer have this long-established economic center, and the established social fabric in adjacent neighborhoods would suffer if minority business owners who live in these neighborhoods are forced to relocate. The FEIS should include an analysis of these impacts and propose mitigation strategies.

(CCLRP0999) Np-10
The community is committed to retaining the rich diversity of our neighborhoods. For the many small businesses along University Avenue, mitigation will be required to enable them to survive construction and to remain in place as property values, rents and taxes rise with the coming of LRT.

**Response Np-016.** The Central Corridor Partnership, an alliance of St. Paul and Midway area business leaders, will be providing assistance to help businesses with marketing strategies and business planning to survive the construction process and let their customers know they are still open. The partnership is developing a business management plan and seeking funding sources. The Central Corridor LRT Project will be handling construction, which includes providing information about detours, signage, etc. Section 3.2.5 of the FEIS describes how short-term impacts would be minimized by using standard construction BMPs such as restricted times for construction. Maintenance of traffic and sequence of construction would be planned and scheduled to minimize traffic delays and inconvenience. Access to all neighborhoods would be maintained throughout the construction period. Although mitigation plans are still being studied and developed by project engineers on a case-by-case basis, BMPs would include working with business-owners to provide an alternate access to their businesses, giving them adequate notice about construction plans and phasing, keeping access to bus stops open, and alerting the public to detours.

**Issue Summary Ql-002.** Concerns in regard to community cohesion (1)

**Comments:**
(CCLRP1017) QI-03
One of the final concerns that I have is just the fracturing. One of the things that the Council talks about is building community, connectivity, and accessibility, and I'm wondering how strong this project will continue to build community when the community is being somewhat torn apart and fractured so tremendously by the impact of not having those stops, the
potential businesses being shut down, parking, and the potential for homeowners and others who are struggling just to keep ends meeting being able to remain in the community.

**Response QI-002.** Construction of the Central Corridor LRT project is intended to enhance community cohesion, connectivity, and access to destinations both within the corridor and to points beyond. As discussed in the FEIS, the significant increases in traffic are expected in future years, resulting in increased congestion, increased air pollution, and reduced pedestrian mobility. Criteria for station spacing and location was discussed in the Central Corridor Scoping Summary Report (2001). The DEIS evaluated 16 new station locations and five shared locations with the existing Hiawatha LRT. The SDEIS evaluated three additional future stations at Hamline Avenue, Victoria Street and Western Avenue, which would result in approximately half-mile station spacing through much of the Central Corridor. The project as proposed in the FEIS includes below grade infrastructure to allow for station construction at a future date.

**Issue Summary T-008. Impact on neighborhood connectivity (1)**

**Comments:**

(CCLRP0969) T-018

Neighborhoods, Community Services, and Community Cohesion - U of M Alignment - Proposed alignment will shift traffic from Washington Avenue to other areas on the campus and surrounding neighborhood streets. Connectivity between neighborhoods may be decreased as a result of this and other circumstances. Specific examples of how neighborhood connectivity will improve would be helpful

**Response T-008.** Section 3.2.3.1 explains that the elimination of private automobile traffic along Washington Avenue would improve the connectivity between the north and south sides of the street, and may focus revitalized commercial activity by emphasizing the largely pedestrian-oriented environment around the U of M. Because the businesses along the proposed Transit/Pedestrian Mall are largely supported by visitors to the U of M and adjacent facilities, the mall may reinforce Washington Avenue as an attractive and inviting commercial center rather than decrease its viability. On East River Road, where a traffic increase is expected, a separate bike path and a series of raised crosswalks will help protect bicyclists and pedestrians in the area. Adverse impacts to this segment's traditional residential neighborhoods will be limited, because the majority of the land surrounding the Transit/Pedestrian Mall is devoted to medical facilities, parking ramps, businesses, recreational and sporting facilities, and dormitories. A summary of all traffic studies conducted, including a discussion of traffic studies related to the development of the Transit/Pedestrian Mall, is included in Chapter 6 of the FEIS and additional information from the studies is available in Appendix J.
Issue Summary T-009. Impact of Washington Ave Bridge modifications on neighborhood connectivity (1)

Comments:
(CCLRP0969) T-019
Washington Ave Bridge - Specific examples of how neighborhood connectivity will improve as a result of modifying the bridge would be helpful.

Response T-009. Central Corridor LRT service between the West Bank and East Bank stations would improve connectivity across the Mississippi River for the neighborhoods around the U of M, such as Prospect Park and Cedar-Riverside. LRT service, in addition to the campus buses that transport students, would give neighborhood residents and students alike improved access to the U of M and the two downtowns.

Issue Summary T-015. Concerned that LRT will be a barrier impacting neighborhood connectivity (1)

Comments:
(CCLRP1022) T-026
And the only thing I can see that this project is doing is cutting neighborhoods in half. I can see the elder people trying to cross the street and they can't.

Response T-015. Construction of the LRT will improve the existing pedestrian infrastructure along University Avenue, and improve the safety of pedestrians through implemented design guidelines. No barrier will be built to limit pedestrian or vehicle travel between the neighborhoods on either side of University Avenue. Neighborhood cohesion issues and mitigations are discussed in Section 3.2 of the FEIS. The development of the LRT will channel pedestrian movements to crossing locations at intersecting streets, where curb improvements and pedestrian islands within the street will shield pedestrians from both LRT vehicles and automobile traffic. Crossings will be available throughout the corridor at almost every currently legal pedestrian crossing. Signalized and non-signalized intersections will allow pedestrian, bicycle, and automobile traffic to interact safely. Landscaping enhancements along the line including trees or public furniture will also help to separate pedestrians from automobile traffic while enhancing street appearance. As discussed in FEIS Section 6.3, all pedestrian crossings will be designed in accordance with current design standards and ADA requirements to ensure access and mobility for all.

Section: 3.2 - Business Impact Concerns

Issue Summary C&F-011. Concerns about impact to local residents and small businesses (4)

Comments:
(CCLRP0945) C&F-11
We would really like to have something addressed before that September submission that
says here's what we've heard and what we think is important about preserving economic opportunity for small businesses in the greater Frogtown neighbors and presumably for University Avenue a whole

(CCLRP0974) C&F-12
Section is about long-term effects of the Key elements and there is no discussion about access to businesses. Add discussion of those impacts.

(CCLRP0999) C&F-13
In some locations, mitigation may also be required to enable current residents and small businesses to survive through construction and remain on University Avenue in the future. The LRT project should bear some of the costs of mitigation, if required, since the loss of on-street parking is the direct result of the project

(CCLRP0953) C&F-14
Too many businesses are in danger of closing if the Corridor is along the University.

Response C&F-011. The Central Corridor Partnership, an alliance of St. Paul and Midway area business leaders, will be providing assistance to help businesses with marketing strategies and business planning to survive the construction process and let their customers know they are still open. The partnership is developing a business management plan and seeking funding sources. The Central Corridor LRT Project will be handling construction, which includes providing information about detours, signage, etc. Section 3.2.5 of the FEIS describes how short-term impacts would be minimized by using standard construction BMPs such as restricted times for construction. Maintenance of traffic and sequence of construction would be planned and scheduled to minimize traffic delays and inconvenience. Access to all neighborhoods would be maintained throughout the construction period. Although mitigation plans are still being studied an developed by project engineers on a case-by-case bases, BMPs would include working with business-owners to provide an alternate access to their businesses, giving them adequate notice about construction plans and phasing, keeping access to bus stops open, and alerting the public to detours.

Issue Summary C&F-018. Concerns about loss of parking and related impact to businesses (3)

Comments:
(CCLRP0997) C&F-21
More specifically, this diagonal realignment would have a negative economic impact on downtown St. Paul. Downtown St. Paul is already short of parking spaces and a large number would be lost with this proposed realignment.

(CCLRP0980) C&F-22
The provision of mitigation funds for small businesses suffering impacts due to construction and loss of parking and, perhaps, to incubate new small and/or minority-owned businesses.
(CCLRP1016) C&F-23
The businesses along the route will need mitigation to stay open and not be displaced during construction, particularly with parking cuts.

Response C&F-018. The Central Corridor Project Office surveyed businesses and conducted an analysis of on-street parking impacts. An inventory of University Avenue parking supply and impacts is summarized in Section 6.3 of the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or underutilized existing parking lots.

Issue Summary Ci-008. Business impacts (1)

Comments:
(CCLRP0971) Ci-08
LRT will have a negative impact on these business owners in three ways. First, the construction phase will make it difficult for customers to get to the businesses, and without the needed customer counts, some will not survive.

Response Ci-008. The outreach team continues and will continue to engage the public in the preliminary engineering process and into construction. The outreach staff will be key in notifying businesses and residents of construction plans, road closures and bus re-routes as well as being a point of contact for construction related emergencies such as power outages. The outreach program provides many avenues for people to submit comments and concerns, which are forwarded to the planners and engineers.

In addition, The Central Corridor Partnership, an alliance of St. Paul and Midway area business leaders, will be providing assistance to help businesses with marketing strategies and business planning to survive the construction process and let their customers know they are still open. The partnership is developing a business management plan and seeking funding sources. The Central Corridor LRT Project will be handling construction, which includes providing information about detours, signage, etc.

Issue Summary Lu-023. Include information for businesses between Harvard Street and Walnut St (1)

Comments:
(CCLRP0969) Lu-23
Summary of Land Use, Zoning, and Socioeconomic Impacts for the Key Project Elements
Add detail to specify the block of businesses noted is between Harvard Street and Walnut St on Washington Avenue.
Response Lu-023. Although the summary of Key Project Elements is not part of the FEIS, more detail about the businesses was added to the land use description for the Harvard Street to Walnut Street on Washington Avenue as requested.

Issue Summary Ql-001. Concern that loss of "buffer of parked cars" will decrease pedestrian safety, and impact businesses (1)

Comments:
(CCLRP1000) Q1-02
Loss of street parking also detracts from the walkability of the corridor, which is important to businesses as well as a safety issue. Pedestrians do not feel as comfortable without a buffer of parked cars.

Response Ql-001. Landscaping enhancements along the line including trees or public furniture will help to separate pedestrians from automobile traffic. As discussed in FEIS Section 6.3 "Other Transportation Impacts," all pedestrian crossings will be designed in accordance with current design standards and ADA requirements to ensure access and mobility for all.

Issue Summary Ql-006. Concerns about impacts to Cedar-Riverside businesses (1)

Comments:
(CCLRP0963) Q1-07
Altered automotive traffic patterns will harm the businesses, and inconvenience residents of Cedar-Riverside.

Response Ql-006. The Cedar-Riverside businesses and residents may benefit from the addition of another transit line in their neighborhood. Traffic impacts are discussed in Chapter 6 of the FEIS.

Issue Summary T-012. Impact on access to residences and businesses (1)

Comments:
(CCLRP0965) T-023
access must not be for the moment but a systemic and constant for all residents and businesses.

Response T-012. Considerable efforts have been made to ensure access for residents and businesses is maintained and/or improved both during and after construction and operation of Central Corridor LRT. See Chapter 3 of the FEIS for further details.

Issue Summary T-014. Impact on access to residences and businesses (1)

Comments:
(CCLRP0952) T-025
The City suggests acknowledging the need to do further analysis during the Preliminary
Engineering phase in downtown St. Paul and on University Avenue east of Marion Street with respect to property access.

Response T-014. Comment noted. It is possible additional analysis regarding property access in the Capitol Area and Downtown St. Paul may be performed during Preliminary Engineering. Property issues are discussed in Chapter 3 of the FEIS.

Section: 3.2 - Concerns about Impact to Spiritual Places and Events

Issue Summary Ge-006. Impact to church access (1)

Comments:
(CCLRP0961) Ge-06
I understand that LRT traffic will travel past Central as often as every seven to ten minutes. This action will impede public access to the church building.

Response Ge-006. The proximity of Central Presbyterian Church to the 10th Street station may improve access to the church, especially for transit dependent populations.

Issue Summary Ge-011. Concerns about adverse effects to Church characteristics and practices (1)

Comments:
(CCLRP0979) Ge-13
Interruptions of Religious Services, Limitations on Ability to Practice Funeral Rites, and the Adverse Effects on the Pipe Organ all Caused by the Project Violate the Religious Land Use and Institutionalized Persons Act

Put simply, the Project jeopardizes characteristics of the Church that are fundamental to the practice of the Catholic faith. As a result of Project operations:
•the Church's ability to conduct dignified, solemn and respectful funeral processions in honor of friends and family members will be significantly diminished;
•the quiet environment inside the Church essential for prayer and contemplation will be obliterated by repeated, loud horn blasts, brake squeals, and train bells;
•Catholic rituals and rites will be repeatedly disrupted by train signal devices and other transit noises; and •the beautiful music included in religious rites and rituals will be marred by horns, bells, and squeals generated by the Project.

These infringements on religious practices caused by Project Operations likely violate RLUIPA. RLUIPA buttresses protections afforded the Church by federal preservation and historic laws; thus warranting a more thorough examination of the means through which these adverse affects can be avoided or mitigated.

The effects of noise and vibration generated by the project will have significant effects on the Church affecting every aspect of its religious practices. Noise and vibrations generated by the
project threaten the quality of music, the ability to carry out solemn rites in a quiet environment, and the ability to worship in a historically significant and beautiful building. Accordingly, federal preservation and historic laws and RLUIPA mandate a more exhaustive examination of the adverse effects operation of the Project will have on the Church and consideration of how these effects may be avoided or mitigated.

**Response Ge-011.** The Metropolitan Council performed a Detailed Noise Assessment and a Detailed Vibration Assessment based on FTA (2006) methods, to evaluate potential noise and vibration effects at the historic churches on Cedar Street in St. Paul. Sections 4.6 and 4.7 of the FEIS discuss the noise and vibration analyses, respectively, including mitigation recommendations. Mitigation measures include discontinuing routine use of LRT horns, and limited them to emergency use. In this manner, their use will be similar to sirens on police, fire department, and ambulance vehicles. Metropolitan Council is also committed to reducing the exposure to LRT bell noise through adjusting the volume and limited the duration of bell use. The vibration analysis recommended a floating slab to mitigate ground-borne vibration and noise at the two historic churches. Refer to the FEIS for a more detailed discussion.

**Issue Summary QI-003. Concerns in regard to impact on churches and funerals (1)**

**Comments:**
(CCLRP1011) QI-04
The funerals are messed up because of the arrival trains, and there's no way for the persons to get the caskets properly into the church in proper dignity.

**Response QI-003.** The CCPO has worked closely with Church of St. Louis King of France and Central Presbyterian Church to reach a solution regarding wedding and funeral vehicle access and ADA accessibility. The CCPO has presented design concepts that would allow wedding and funeral vehicles to park in front of the church using the space between the LRT tracks and the church buildings. The CCPO and Central Presbyterian Church and Church of St. Louis King of France are working towards a solution to provide adequate ADA access. Community cohesion is discussed in Section 3.2 of the FEIS.

**Issue Summary QI-004. Concerns in regard to impact on weddings and funerals (1)**

**Comments:**
(CCLRP0961) QI-05
The seamless transferring of caskets between hearses and the sanctuary for the funeral services will necessitate complex coordination with LRT. The multiple LRT trains passing Central church will truly interfere with wedding ceremonies.
Response QI-004. The CCPO has worked closely with Church of St. Louis King of France and Central Presbyterian Church to reach a solution regarding wedding and funeral vehicle access and ADA accessibility. The CCPO has presented design concepts that would allow wedding and funeral vehicles to park in front of the church using the space between the LRT tracks and the church buildings. The CCPO and Central Presbyterian Church, Church of St. Louis King of France, and MPR are working towards a solution to provide adequate ADA access. Community cohesion is discussed in Section 3.2 of the FEIS.

Issue Summary QI-008. Concerns about impact on ceremonial life of institutions

Comments:
(CCLRP0989) QI-06
This is a loss not just of on-street parking and drop-off space but of the day-to-day and ceremonial life of institutions to which ceremony is central. Weddings and funerals, to name only the most obvious examples, will be relegated to secondary entrances. The vital link between the life of these institutions and the life of the street will be broken.

Response QI-008. The Preferred Alternative would limit access to the alley leading to the north entry of the Central Presbyterian Church. The Metropolitan Council is working with the church to develop an agreement that would provide daily access to the south church entrance, and special, but limited, access to the north church entrance for weddings, funerals, and similar special needs. The Preferred Alternative would also result in the removal of on-street parking spaces along Cedar Street, including those in front of the St. Louis King of France Church. Metropolitan Council will install a surmountable curb on Cedar Street to enable wedding and funeral vehicles to park in front of the church as they do today.

Issue Summary T-001. Concerns about impacts and mitigation for church activities

Comments:
(CCLRP0989) T-001
Access to the main entrances - architectural and functional - of both churches would be severely limited, not only during construction but permanently, by the tracks on the east side of Cedar.

(CCLRP0986) T-002
Finalize plans for addressing the loss of Central's only ADA entrance.

(CCLRP0986) T-003
Page 238 of the SDEIS states that "Potential of access closure; on street parking removed; closure of access could be an adverse effect." Closure of this access does have an adverse affect, since it is our only ADA-approved handicap accessible entrance. Loss of this entrance is unacceptable and presents other legal implications. LRT staff, including a traffic engineer and architect, have met on site to explore how the Central Corridor Project could meet the ADA requirements resulting from the loss of this entrance. Met Council must resolve the loss of this accessible entrance and have the resolution measures accepted by Central Presbyterian Church. The costs must be included in the overall project.
Central must relocate its trash dumpster that is in the dead-end alley and as well as its only ADA certified wheelchair ramp necessary to enter the church building. The elderly, some of whom have hearing, vision, and mobility disabilities, form a large part of the congregation. They will have great difficulty alighting from vans and vehicles and participating in worship.

This LRT will discriminate against the elderly because there's no way for them to get into the only authorized ADA ramp in the church. We would have to redo the new ramp someplace else.

We are particularly concerned about the issues of parking during funerals and access for disabled churchgoers, and are hopeful they can be fully addressed and mitigated, since, to our eyes, an engineering solution is not readily visible.

Access to the driveway between Central Presbyterian Church and the Church of St. Louis is lost, further diminishing access to the church for events, and for the disabled.

The LRT will obstruct the abilities of Central to conduct outreach services to minister to people in the downtown area by limiting access to the church.

The arriving trains, as we understand it, between 7 and 10 minutes, block the only loading zone of the church. We understand there's supposed to be some mitigation (inaudible) have not been satisfied with what I've heard so far.

Tracks are right -- go next to the church property 28 feet from the front door of the church. In our opinion, my wife's and my opinion, the tracks effectively block the church's only access to a public street.

Current plans for the LRT alignment on the eastern side of Cedar will remove all current parking along Cedar. This has a particular impact on our ability to conduct funerals, as caskets are only able to enter and depart the sanctuary from the main doors on Cedar.

It is imperative for the function of our church that parking for hearses and wedding vehicles be allowed on Cedar Street in close proximity to our main sanctuary doors.

Parking on Cedar Street in front of St. Louis Church and Central Presbyterian Church would
be eliminated under current plans for LRT. This represents a loss of 20-25 spaces (unverified). This parking is needed to provide access for special church services. Funerals in particular need easy access to the front of the church to gracefully carry the casket to the hearse. With the loss of these spaces, access to the church for the disabled is very significantly diminished as well.

Response T-001. A portion of the alignment along Cedar Street in the Capitol Area will pass in front of two churches where adverse impacts may occur because the right-of-way for the Preferred Alternative in this location is not wide enough to allow a traffic lane in front of the church buildings.

The Preferred Alternative would limit access to the alley leading to the north entry of the Central Presbyterian Church. Mitigation measures being proposed by the Metropolitan Council, which is working with the church to develop an agreement, would provide daily access to the south church entrance, and special, but limited, access to the north church entrance for weddings, funerals, and similar special needs. This mitigation may include relocating trash receptacles, leasing close-in parking spaces for parishioners with limited mobility, and improving church security systems.

The Preferred Alternative would also result in the removal of on-street parking spaces along Cedar Street, which will include those in front of the St. Louis King of France Church. Metropolitan Council will install a surmountable curb on Cedar Street to enable wedding and funeral vehicles to park in front of the church as they do today. A full discussion of impacts to parking facilities is provided in Section 6.3.

Section: 3.2 - Report Corrections Needed

Issue Summary Ge-010. Report corrections needed (1)

Comments:
(CCLRP0974) Ge-12
- 3-49 (Cedar-Riverside) - The neighborhood does not have a large concentration of Native American people, though there is a diverse mix of ethnicities and national origins
- 3-50 (Figure 3.2-12) - The area labeled Cedar Riverside Community is incorrect, and should be relabeled Riverside Plaza Apartments
- 3-52 (Downtown West) - Hennepin County Medical Center is not located in this neighborhood, it is in Elliot Park instead (and is correctly listed under that heading)
- 3-83 (Downtown Minneapolis) - Fire Station G is in Cedar Riverside, not downtown

Response Ge-010. The text in Section 3.2 of the FEIS was updated to reflect the information provided in this comment.
Issue Summary Ge-016. Report correction needed (1)

Comments:
(CCLRP0969) Ge-19
Table 9-2 9-5 Opus development on Washington Avenue between Oak and Ontario should be added. Multimodal transportation hub development should include a planned bike center.

Response Ge-016. The text in Chapter 9 of the FEIS was updated to reflect the information requested in this comment.

Issue Summary Ge-017. Concerns about impact on the environment in the neighborhoods (1)

Comments:
(CCLRP0993) Ge-20
We believe that the affect of up to 50% or more of additional traffic on the University Avenue S E and 4th Street S E corridor will have significant and longstanding negative impact on the environment in the neighborhoods surrounding the Central Corridor LRT, which have not adequately been considered in development the SDEIS.

Response Ge-017. Impacts to neighborhoods and community cohesion are discussed in Section 3.2 of the FEIS. Traffic impacts are discussed in Chapter 6 of the FEIS.

Section: 3.3 - Acquisitions and Displacements -

Issue Summary Ci-001. Alignment concerns related to acquisition (1)

Comments:
(CCLRP0997) Ci-01
I represent the owners for :J60 Cedar Street, LLC that owns property on the southeast corner of 5th and Cedar Streets in downtown St. Paul. The planned alignment of the Central Corridor LRT calls for a light rail track and station to be located on that block and would require the acquisition and demolition of our building. I submit that this change in the diagonal alignment through this block and its impact are not adequately addressed in the SDEIS. I submit that the City of St. Paul is either unwilling or unable to act as the taking authority which undermines the conclusion in the SDEIS that the construction of LRT stations will promote redevelopment.

Response Ci-001. Comment noted.
Section: 3.4 - Cultural Resources

Issue Summary Ph-001. Concerns about impact to church near the Tenth Street Station (1)

Comments:
(CCLRP0979) Ph-53
In light of the Church's proximity to the Tenth Street Station and the signalized intersection at Tenth and Cedar the Church will be frequently subjected to intense noise from brake squeal and train signals. Based on estimates provided in the SDEIS, a train will pass in front of the Church every 7.5 minutes during peak operating hours and every 10 minutes during off-peak hours. See SDEIS at S-14. Considering only regularly scheduled Church events, horn blasts and train bells will interrupt these events and services at least 282 times a week.2 The intensity and frequency of the noises generated by the Project will significantly and adversely affect the quiet and serene environment of the Church, supporting a determination that it is used under Section 4(f). Because the Church is subject to Section 4(f) use an examination of alternatives and mitigation is required before the Secretary of Transportation can approve the Project. The vibrations generated by the Project certainly affect the beauty and utility of Church and its pipe organ. These effects support a determination that it is used under Section 4(f), and require a full examination of alternatives and mitigation measures before the Secretary of Transportation can approve the Project.

Project staff and consultants have omitted known Project generated noises in the consideration of potential impact to the Church, and have relied on FTA standards that are obviously different from actual Project conditions.

Additionally, the Section 4(f) analysis cannot rely on FTA standards that are obviously different from actual Project conditions. The FTA standard assumes a distance from source to receiver of fifty feet, whereas, under predicted project conditions the train will pass less than thirty feet from the front door of the Church. Moreover, under certain conditions, the train will brake, idle, and sound its bell/horn immediately in front of the Church.

In sum, Section 4(f) requires full consideration of the potential impacts of a transportation project on protected properties; satisfaction of this requirement necessitates an analysis of all the noises generated by the Project under conditions as the will exist near such a protected property. Here, the SDEIS fails to satisfy Section 4(f) requirements.

Response Ph-001. A determination of "use" or "constructive use" by FTA is required prior to the requirement for an alternatives analysis. The proposed project would not convert this building to a transportation use; therefore there is no Section 4(f) use of this property. The FTA has not determined that a constructive use would occur at this location. If the FTA does determine that a constructive use would occur at this location, then an avoidance analysis would be necessary.
Issue Summary Ph-003. **Include U of M in design process** (1)

**Comments:**
(CCLRP0969) Ph-10
Adverse Effects on Historic and Cultural Resources - Adverse Effects to our historic resources that may be caused by the introduction of a light rail system have yet not been identified. Therefore, subsequent mitigation efforts can not be proposed or approved until after all anticipated adverse effects are identified and documented. The University looks forward to working with the project, SHPO, MnDOT, National Park Service, MNRRA, Minneapolis Park and Recreation Board and other partners to ensure the project's impacts to historic and cultural resources are sufficiently mitigated.

**Response Ph-003.** Comment is noted. The University of Minnesota will continue to be a party to the ongoing design process.

Issue Summary Ph-004. **General concerns in regard to project impacts and mitigation** (3)

**Comments:**
(CCLRP0952) Ph-01
The section on Cultural Resources (3.4, Table 3-9, and text on 3-98, 102 and 104) list the State Historic Preservation Office's (SHPO) concern about encroachment into the Lief Erickson Lawn in the southeast quadrant of the University and Rice intersection, and impact on the State Capitol Power Plant (691 Robert Street). Further SHPO has expressed concerns about vibration, noise and traffic impacts on the National Register-eligible Norwegian Evangelical Lutheran Church and Ford Motor Company Building. The SDEIS references the Section 106 process to fully address these issues, including defining methods for avoiding, minimizing or mitigating potential impacts. There is an ongoing process among the Metropolitan Council, MnDOT and the SHPO to develop such methods.

(CCLRP0969) Ph-47
Potential Impacts to Eligible or Listed National Register of Historic Places Properties - U of M Old Campus Historic District (the Knoll) In addition to Pillsbury Drive and Pleasant Street, Arlington Street will be affected due to the closure of Washington Avenue.

(CCLRP0969) Ph-54
7.2.2 7-9 Any mitigations required on campus must be completed by the project as project costs.

**Response Ph-004.** Cultural resource reports have been completed for the project with input from SHPO, consulting parties to the 106 process, and local stakeholders. Detailed evaluations of parks, cultural and historic resources are included in Sections 3.4 and 3.5 of the FEIS. The resolution of these Section 106 issues is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS.
Issue Summary Ph-005. Include explanation of transit mall section from Pleasant to Walnut (1)

Comments:
(CCLRP0969) Ph-49
Physical and Operating Characteristics of Proposed Changes to AA/DEIS LPA
The proposed changes to AA/DEIS LPA column under the University/Prospect Park area should include an explanation of the transit mall section from Pleasant to Walnut in the East Bank area.

Response Ph-005. Comment noted. The proposed transit mall is described in Table 2-1 (3rd column) as an at-grade station and multi-modal transit facility.

Issue Summary Ph-006. Concerns about lack of mitigation for impacts to churches (1)

Comments:
(CCLRP0965) Ph-09
And what about the SHPO concerns for Churches in the downtown St. Paul area and the downtown alignment? Again your mitigation efforts appear silent and non-existent.

Response Ph-006. Design efforts are ongoing to avoid adverse effects. Mitigation is premature before a finding of adverse effect. Measures to lessen noise and vibration in relation to the historic churches and their significant features are being evaluated and identified as part of this FEIS.

Issue Summary Ph-008. Proposed designs must conform to current architecture and community (1)

Comments:
(CCLRP0985) Ph-04
The station at Union Depot will be in the Lowertown District, which is recognized on the National Register of Historic Places, and as such, has its own design guidelines. While this designation brings with it some specific standards to ensure new structures would integrate well with the district, it does not require the structure be strictly historical in nature. In fact, it may be appropriate if the architectural character of the station is more neutral in design so it doesn't detract from the more authentically historic buildings nearby, and functions better as part of the district.

Response Ph-008. Design of the station is ongoing, and comments will be solicited from local stakeholders.

Issue Summary Ph-012. Station design strategy is needed (1)

Comments:
(CCLRP0960) Ph-15
A strategy that addresses the design of the three proposed future stations.
Response Ph-012. It is likely that design elements from the planned stations will be used for the proposed stations. is the design of future stations is addressed in the Programmatic Agreement, which is included in Appendix G of the FEIS.

Issue Summary Ph-016. Archeological survey discussion needed (1)

Comments:
(CCLRP0960) Ph-14
Provisions for any needed archeological surveys. The discussion should include a review of the surveys completed in the corridor to date.

Response Ph-016. Previous archeological surveys are discussed in Chapter 3.4. MnDOT required no further archeological analysis for the SDEIS. Because of the proposed disturbance of the Leif Erikson Lawn, further information was requested. In May 2008, MnDOT recommended that there was no potential archeological significance, and SHPO concurred. In addition, the Programmatic Agreement will address any outstanding concerns related to archaeological resources. This is discussed in Chapter 3.4 of the FEIS. The Programmatic Agreement is located in Appendix G of the FEIS.

Issue Summary Ph-018. Need discussion as to why 4f impacts could not be avoided (1)

Comments:
(CCLRP0969) Ph-55
7.4 7-13 The agency coordination meeting focused on the Campus' Historic Mall region—there has not been coordination on 4f impacts of parklands on/off University property. This discussion should include other alternatives that would avoid 4(f) resources, and why those alternatives were determined infeasible.

Response Ph-018. Section 4(f) requires alternatives when a proposed project would either "use" or "constructively use" Section 4(f) protected property, as defined in Section 7.1. There has been no determination of either use or constructive use at this location; therefore, an avoidance analysis is not required.

Issue Summary Ph-019. Analysis/clarification needed in regard to impact on river park and parkway resources (1)

Comments:
(CCLRP0974) Ph-52
Chapter 7 - Section 4(0 Evaluation - It is unclear how the traffic and their associated impacts will be assessed and determined related to the 4(f) river park and parkway resources. These impacts should be disclosed with the DEIS so that they can be addressed, understood, and resolved sooner. How will these impacts be disclosed and what will be the opportunity for community/agency input on these impacts?
Response Ph-019. Section 7.1 has been revised to clarify that Section 4(f) addresses "use" and/or "constructive use" of Section 4(f) protected property. Section 4(f) does not address impacts unless they constitute a use of Section 4(f) protected property.

A comparison of the estimated 2030 ADT (and PM peak hour volumes) was evaluated as part of Traffic Study #3 (U of M regional area study). The data are presented in a table called "2030 Travel Demand Model Volumes Summary" and included 2030 Base data and 2030 LRT with Ped/Transit Mall. A traffic Signal at East River Road and the eastbound Washington Avenue exit is part of the mitigation commitments agreed to in the Memorandum of Understanding. A summary of all traffic studies conducted, including a discussion of traffic studies related to the development of the Transit/Pedestrian Mall, is included in Chapter 6 of the FEIS and additional information from the studies is available in Appendix J.

Issue Summary Ph-020. General concerns in regard to impacts and mitigation (2)

Comments:
(CCLRP0986) Ph-08
The SDEIS is supposed to address impacts and mitigation, but many of the impacts of LRT on Central Presbyterian remain unresolved or incomplete. No Section 4 evaluation was completed for the Alternative Analysis Draft in 2006 and Section 7-4 of the current draft lacks clarity or specificity on how Central will be "used" or affected by the light rail. With so many unresolved issues, Central believes the SDEIS fails to adequately address issues that will adversely affect religious services, the church structure, cultural and social events and the core operations of the church.

(CCLRP0969) Ph-50
The conclusion that the Washington Avenue at-grade alternative avoids direct impact to a historic resource should be further explained, as neither the Section 106 determination of effect nor the Section 4(f) use status of the Campus Mall Historic District and Knoll area or Washington Avenue Bridge has been determined.

Response Ph-020. The proposed project would not require the incorporation of property outside of the existing Washington Avenue right-of-way. The construction of a Transit/Pedestrian Mall along Washington Avenue would result in the removal of automobile traffic from this part of campus. The proposed project would introduce overhead catenary system elements, including poles and wires, into the viewshed of the Northrop Mall Historic District. These would; however, be designed to blend into the existing setting to the greatest extent possible in order to not be visually intrusive. The proposed project would not generate significant increases in the levels of noise or vibration in this area that cannot be minimized or mitigated through project design. The changes proposed for Washington Avenue at the University of Minnesota Campus Mall Historic District would have no adverse effect on the attributes of this historic district. Therefore, there is no Section 4(f) use of this property and no avoidance analysis is required. More details are available in Chapter 7 of this FEIS. The Programmatic Agreement developed under Section 106 is provided in Appendix J of this FEIS.
The Washington Avenue Bridge is currently being evaluated for retrofit because it is a fracture-critical bridge, and modifications must be made to the bridge to bring it into compliance with recently revised State rules regardless of the Central Corridor LRT project. Additional modifications, beyond those needed to strengthen the bridge, may be required in order for it to accommodate the proposed LRT traffic. The modifications to the Washington Avenue Bridge would have no adverse effect on the historic attributes of this bridge. thus no Section 4(f) use would occur (see Chapter 7 of this FEIS).

The Central Corridor LRT project would not require the incorporation of property from the Central Presbyterian Church. Therefore, there is no Section 4(f) use of this property and no avoidance analysis is required. Access to the parcel from Cedar Street, however, will not be available for regular day-to-day use. Day-to-day access may be provided by arranging for weekday, business-hour parking arrangements in the surface lot on the south side of the church owned by Minnesota Public Radio. Noise and vibration modeling indicate that there would be no adverse effect to this building due to the incorporation of attenuation features during project design, as described in Appendices J3, Noise, and J4, Vibration. Noise and vibration issues will continue to be addressed during design so that noise and vibration would not have an adverse effect upon this building or its occupants. See Chapter 7 of the FEIS for more detail.

Issue Summary Ph-024. Need to minimize and clarify extent of "trench" in roadway (1)

Comments:
(CCLRP0985) Ph-03
Minimize the trench around the Capitol, and Robert Street - need more research into exactly where the trench is proposed

Response Ph-024. The "trench" will be in the roadway. The details are being refined in preliminary engineering.

Issue Summary Ph-025. Disagrees that impacts will not be adverse (1)

Comments:
(CCLRP0995) Ph-30
In Chapter 7, the Section 4(F) Evaluation concludes that the LRT project might result in permanent use of the Saint Paul Union Depot and that constructive use is unlikely. Figure 7-2 illustrates the configuration of the Union Depot station platform, but that plan differs drastically from the illustrations provided at our onsite meeting on August 18, 2008. (Ramsey County Regional Railroad Authority and URS, "Pedestrian Circulation Union Depot Transit Station," Comparison of Alignment Alternatives," and "Minnesota's Union Depot Multi-Modal Transit Hub," all dated August 11, 2008, and DMJM Harris, AECOM, and Kimley-Horn and Associates, "The Central Corridor LRT Union Depot Exhibit," dated July 22, 2008.) Given the obvious development of these later plans, I believe the SDEIS statement is misleading and that its conclusion-that the anticipated effects will not be adverse-is inaccurate.
Response Ph-025. The design of the passenger station at Union Depot was modified from having both platforms located between the tracks, to a new layout with the two tracks running down the middle and the passenger platforms on the outside of the tracks. The effects and use of the Union Depot, and avoidance alternatives are discussed in Chapter 7 of the FEIS. In addition, Appendix L includes the Engineering Plan Sets, which provide up-to-date details about the station and its placement relative to the Union Depot.

Issue Summary Ph-028. Concerns about visual effects (1)

Comments:
(CCLRP0969) Ph-43
University/Prospect Park - At-Grade Transit/Pedestrian Mall
The cultural resources section appearing earlier in the document refers to SHPO concern about visual effect and notes that a determination of effect on the Campus Mall District has not yet been made. This is not mentioned in the visual effects analysis and should be.

Response Ph-028. The discussion of the potential for visual impacts to a historic district is appropriately discussed in the section that discusses impacts to historic resources.

Issue Summary Ph-036. Concerns about station and related element design (1)

Comments:
(CCLRP0960) Ph-12
The Rice Street station and track/structures from Rice Street to Robert Street. This design needs to take into account the relationship between the project design and the State Capitol Mall Historic District (most primarily the Capitol Building and the Leif Erickson Lawn), the Ford Motor Company Building, and the Norwegian Evangelical Lutheran Church (Christ Lutheran Church). The most troublesome elements included in current proposals are the imposition of the station structure/sidewalk on a portion of the Leif Erickson Lawn, and the location of the station structure, that walls off one of the three edges of the open lawn and creates a barrier between the lawn and the historic buildings located on the north side of University Avenue. We note that this effect is largely the result of moving the station from west of Rice Street to east of Rice Street, and of lengthening the structure to a three-car station (both subjects of the SDEIS). The design of all walls, railings, walkways, and other site elements near the Capitol is also of concern in this area.

Response Ph-036. The two stations and related elements are evaluated according to the Section 106 process, and are described in Sections 3.4 and 3.6 of the FEIS. The resolution of these Section 106 issues is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS.
Issue Summary Ph-041. Concerns about impacts by 10th Street station, traction power substation and related elements (1)

Comments:
(CCLRP0960) Ph-25
The 10th Street station, traction power substation, and track/structures from 12th Street to 7th Street. This design needs to take into account the relationship between the project design and St. Louis King of France Church, Central Presbyterian Church, St. Agatha's Conservatory (Exchange Building), and the two southernmost lawn panels of the Capitol approach (between 12th Street and 10th Street). The Cedar Avenue lawn panels will be adversely affected. Problems of access and other issues raised by the two church properties need to be addressed.

Response Ph-041. The 10th Street station, traction power substation, and track/structures from 12th Street to 7th Street are evaluated according to the Section 106 process, and are described in Sections 3.4 and 3.6 of the FEIS. The resolution of these Section 106 issues is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS.

Issue Summary Ph-042. Concerns about impact by traction power substations and poles and catenary (2)

Comments:
(CCLRP0960) Ph-18
The placement and design of traction power substations are included in several of the areas listed above. Other substations located outside these areas but near individual historic properties also need to be addressed. These include substations in the vicinity of the Krank building, Porky's Drive-In, and the Brioschi-Minuti Company building. Consultation should begin as site decisions are made, and not delayed until substantial design has been completed.

(CCLRP0960) Ph-19
The placement and design of the poles and catenary are issues in several of the areas listed above. The design of other segments of the pole and catenary system outside of these areas but near other historic properties also needs to be addressed. These include the KSTP Production Studios and Transmission Tower; Fire Station No. 25; the Great Lakes Coal and Dock Company Office Building; the Minnesota Transfer Railway Company bridge; the Krank Building; Porky's Drive-in; the Griggs, Cooper & Company Sanitary Food Manufacturing Plant; the St. Paul Casket Company Factory; the Rath's Mills, Bell and Company Building; the Brioschi-Minuti Company Building; Fire Station No. 18; the Owens Motor Company Building; the Minnesota Milk Company Building; the St. Paul Urban Renewal Historic District; the Minnesota Building; the Pioneer Press Building; the Endicott Building; The First National Bank Building; and the Lowertown Historic District.

Response Ph-042. These historic properties are evaluated according to the Section 106 process, and are described in Sections 3.4 and 3.6 of the FEIS. The resolution of these Section 106 issues is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS.
Issue Summary Pp-035. Report clarifications needed in regard to impacts on Central Church (1)

Comments:
(CCLRP0961) Pp-37
During my recent LRT tour, your rep said that the Light Rail planners would work to relieve the stressors on Central church's situation. This information should be in writing and attached to the SDEIS to allow for careful consideration.

Response Pp-035. The CCPO has worked closely with Central Presbyterian Church to reach a solution regarding wedding and funeral vehicle access and ADA accessibility. An agreement is being developed that would provide daily access to the south church entrance, and special, but limited, access to the north church entrance for weddings, funerals, and similar special needs. This may include relocating trash receptacles, leasing close-in parking spaces, and improving church security systems.

Section: 3.4 - Concerns about Historic Preservation

Issue Summary A-001. Impact to historic approach to Union Depot (1)

Comments:
(CCLRP0995) A-01
I request that further analysis be performed to consider relocating the station platform in front of the Union Depot. Moving the station to a location where it will not encroach on the historic approach to Union Depot has not been presented as an alternative to reduce this potentially adverse effect. The SDEIS also does not appear to give much consideration to the visual impacts that the station platform and canopies will have on the historic facades of the depot and the adjacent buildings. I also object to the proposed extension of the LRT to the concourse by bisecting the historic rail yard, as the linear character of that space is essential to understanding its historic function.

Response A-001. Due to a number of concerns expressed during the SDEIS comment phase as well as the Section 106 consultation process, various alternative locations and configurations of the Union Depot station were developed. These alternatives were analyzed and the results were shared with project stakeholders. A full discussion of this planning process and the final preferred alternative as well as the means by which this alternative avoids and/or minimizes cultural resource impacts is found in Chapters 3 and Chapter 7 of the FEIS.
Issue Summary Np-008. **TPSS must not be located near residential or historically sensitive properties** (1)

**Comments:**
(CCLRP0965) Np-15
TPSS must not be located near residential or historically sensitive properties.

**Response Np-008.** TPSS impacts to neighborhoods and historic properties will be reduced by restricting their placement to underutilized parcels such as surface parking lots. Five of the 13 TPSS are located at the OMF or near stations and these TPSS will be seen as a part of the main transportation system. All other TPSS are located near commercial or industrial buildings, with the exception of two TPSS that will be located between commercial properties and residential areas.

Issue Summary Ph-002. **Parking and access concerns related to historic properties** (1)

**Comments:**
(CCLRP0960) Ph-16
Any specific provisions and/or mitigation measures that are needed to deal with parking and access issues related to historic properties. These issues include the removal of parking, particularly near commercial properties, as well as potential increases of parking on residential streets adjacent to the corridor.

**Response Ph-002.** The resolution of provisions and/or mitigation measures that are needed to deal with parking and access issues related to historic properties is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS.

Issue Summary Ph-007. **Concerns about impacts on historic buildings** (1)

**Comments:**
(CCLRP0985) Ph-06
The age of the University Club, and impact on the historic building is a concern

**Response Ph-007.** Design efforts are ongoing to avoid adverse effects to historic properties.

Issue Summary Ph-013. **Historical and cultural resource mitigation plans needed** (1)

**Comments:**
(CCLRP0969) Ph-45
Mitigation - Explanation of possible mitigations with regard to University historical and cultural resources is needed.

**Response Ph-013.** The resolution of provisions and/or mitigation measures that are needed is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS.
Issue Summary Ph-014. Concerns about impacts to historic properties during construction (1)

Comments:
(CCLRP0960) Ph-28
Any specific provisions and/or mitigation measures that are needed to deal with temporary impacts to historic properties during the construction process.

Response Ph-014. No temporary impacts have been identified to date. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process.

Issue Summary Ph-015. The design of the station at 10th & Cedar must be sensitive to nearby historic buildings (1)

Comments:
(CCLRP0985) Ph-05
The station at 10th & Cedar is surrounded by significant historic buildings and sites, and should be designed with careful sensitivity to its place.

Response Ph-015. Presumably, the writer is referring to the two churches and St. Agatha’s Conservatory located south of 10th Street. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process.

Issue Summary Ph-017. Encourage the rehabilitation of historic properties (1)

Comments:
(CCLRP0960) Ph-26
Measures to encourage the rehabilitation of historic properties within the redevelopment context are needed. Such measures could include National Register nomination forms for those properties that are eligible but that have not been listed (these forms would enable the State Historic Preservation Office to nominate the properties for actual listing, which would make the federal Preservation Tax Incentives available to developers and owners), other financial incentives for historic properties, and educational/technical assistance to owners of historic properties.

Response Ph-017. Rehabilitation of historic properties, financial incentives, and educational/technical assistance are addressed in the Programmatic Agreement, which is included in Appendix G of this FEIS.
**Issue Summary Ph-021.** Project must conform to preservation standards in regard to designated historic districts (1)

**Comments:**
(CCLRP0975) Ph-07
The light rail will run through two locally designated historic districts, Lowertown and University-Raymond, and will pass by several other designated and determined eligible historic sites. In order for the HPC to safeguard St. Paul's historic resources there are a wide range of considerations the HPC will deliberate to determine whether the proposed work complies to appropriate preservation standards and guidelines and whether any negative impacts to cultural resources are appropriately mitigated.

**Response Ph-021.** St. Paul HPC is recognized as a partner in the review process. Its role is strengthened as a consulting party to the Programmatic Agreement.

**Issue Summary Ph-026.** Concerned about impacts to St. Paul's historic transportation center (1)

**Comments:**
(CCLRP0960) Ph-27
Even with the best work on a compatible final design, it is highly probable that the current project plans will result in adverse effects. Indeed, for the St. Paul Union Depot, current project plans create substantial adverse effects on three sides of the property. It would be truly unfortunate if a laudable effort to revitalize St. Paul's grand historic transportation center for future transportation needs was to significantly diminish the historic character of the facility.

**Response Ph-026.** Subsequent to the publication of the SDEIS, various alternative locations and configurations of the Union Depot station were developed in an effort to find an alternative that would minimize or avoid impacts. These alternatives were analyzed and the results were shared with project stakeholders. Ultimately, the alignment and layout of the center-platform passenger station was modified from having both platforms located between the tracks, to a new layout with the two tracks running down the middle and the passenger platforms on the outside of the tracks. With these design modifications, the need remains to convert land from the front of the St. Paul Union Depot to a transportation use and to close the semicircular driveway to privately owned vehicles. However, the modifications reduce the amount of right-of-way that needs to be acquired, eliminates the Section 4(f) use of the Union Depot Elevated Railyard Deck and allows Wacouta Street to remain open to through traffic. These modifications are reflected throughout this FEIS in the Preferred Alternative.

**Issue Summary Ph-027.** Concerns about impacts on historic resources (2)

**Comments:**
(CCLRP0960) Ph-20
The Union Depot station, traction power substation, track/structures from the station to the maintenance facility, and the maintenance facility itself. This design needs to take into
account the relationship between the project design and the historic Union Depot (including the head house and approach, concourse, and entire elevated train deck) as well as the Lowertown Historic District. The most troublesome elements included in current proposals are the taking of a sixteen foot section of the historic front green space of the depot approach, the Wacouta mid-block alternative for the track (which has significant adverse effects on the historic setting of the depot within the city street grid, as well as on an adjacent historic warehouse), and various proposed track configurations which require removal of substantial portions of the historic train deck structure.

(CCLRP0960) Ph-21
The West Bank station, East Bank station, traction power substation, bridge, and track/structures from 35W to Oak Street. This design needs to take into account the relationship between the project design and the University of Minnesota Campus Mall Historic District, East River Parkway, the Washington Avenue Bridge (including buildings/structures built as part of the bridge approaches on both banks), and Fire Station G/Engine House 5 (Mixed Blood Theatre). In addition, other effects may relate to Pioneer Hall, the Mines Experiment Building, and the University of Minnesota Old Campus Historic District. Additional discussion is needed with regard to potential traffic issues related to the closing of Washington Avenue to vehicles.

Response Ph-027. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process. Appendix G includes the Programmatic Agreement.

Issue Summary Ph-030. Concerns in regard to impact of historic properties for St. Paul Union Depot and the Capitol area (1)

Comments:
(CCLRP0960) Ph-11
the St. Paul Union Depot and the Capitol area - are of particular concern. In both of these areas, the proposed locations of project elements presented in the SDEIS are in basic conflict with character-defining features of historic properties.

Response Ph-030. Details of the ongoing Section 106 consultation process for the Union Depot and the State Capitol area, among other historic properties, are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process. Appendix G includes the Programmatic Agreement.

Issue Summary Ph-031. Concerns that National Historic Preservation Act requires further evaluation (1)

Comments:
(CCLRP0993) Ph-57
We also assert that sufficient consideration and compliance with the following federal
regulations has not been accomplished: Section 106 of the National Historic Preservation Act requires that the SDEIS analyze the adverse effects of the Washington Avenue at-grade alternative and evaluate the northern alignment.

**Response Ph-031.** The National Historic Preservation Act does not require these analyses.

**Issue Summary Ph-033.** Collaborate with State historic and cultural agencies in regard Section 106 process (1)

**Comments:**
(CCLRP1003) Ph-31
In addition, since the Union Depot is a listed property on the National Register of Historic Places and located within the Lowertown National Register Historic District, the Section 106 process must continue to be closely coordinated between the two undertakings. We recommend a continued series of meetings with the Minnesota State Historic Preservation Office, Minnesota Department of Transportation's Cultural Resources Unit and consulting parties to understand the affects to these properties.

**Response Ph-033.** Subsequent to the publication of the SDEIS, various alternative locations and configurations of the Union Depot station were developed in an effort to find an alternative that would minimize or avoid impacts (see Section 7 of the FEIS). These alternatives were analyzed and the results were shared with project stakeholders. Details of the ongoing Section 106 consultation process for these historic properties are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process. Appendix G includes the Programmatic Agreement. In addition, Appendix L includes the Engineering Plan Sets, which provide up-to-date details about the station and its placement relative to the Union Depot.

**Issue Summary Ph-037.** Design must be sensitive to St. Paul Urban Renewal Historic District area (1)

**Comments:**
(CCLRP0960) Ph-13
The 4th Street station, traction power substation, and track/structures through the block. This design needs to take into account the relationship between the project design and the St. Paul Athletic Club and the St. Paul Urban Renewal Historic District. Potential removal of a contributing building in the district will need to be addressed.

**Response Ph-037.** Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process. Appendix G includes the Programmatic Agreement. In addition, Appendix L includes the Engineering Plan Sets, which provide up-to-date details about the 4th and Cedar Streets Station.
Issue Summary Ph-038. Design should be sensitive to businesses and historic resources (3)

Comments:
(CCLRP0960) Ph-22
The track/structures between St. Mary's Avenue Southeast and Emerald Street. This design needs to take into account the relationship between the project design and the Prospect Park Historic District and the Prospect Park Water Tower and Tower Hill Park. Specific issues that need to be addressed include the potential taking of portions of three landscaped triangles at the entrances to the historic district, and concerns related to traffic and parking.

(CCLRP0960) Ph-23
The Raymond Avenue station, traction power substation, and track/structures from Highway 280 to Hampden Avenue. This design needs to take into account the relationship between the project design and the buildings of the University-Raymond Historic District. The project is located in the center of the district.

(CCLRP0960) Ph-24
The Snelling Avenue station and track/structures between Fry and Simpson Streets. This design needs to take into account the relationship between the project design and the Quality Park Investment Company (Midway Books).

Response Ph-038. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process. Appendix G includes the Programmatic Agreement.

Issue Summary Ph-039. Mitigation should protect historic properties from noise and vibration impacts (1)

Comments:
(CCLRP0960) Ph-17
Any specific protective and/or mitigation measures that are needed to address noise and vibration issues at historic properties.

Response Ph-039. Metropolitan Council performed detailed operation and construction noise analyses based on FTA guidance (2006). Analysis results as discussed in FEIS Section 4.6.6.2-3 guided the selection of mitigation measures throughout the corridor, including where historic properties exist. Metropolitan Council is committing to the mitigation of several noise impacts throughout the corridor through administrative and receiver based mitigation. The noise mitigation measures are described in detail in FEIS Section 4.6.8. Metropolitan Council also performed detailed operation and construction vibration analyses, which are described in FEIS Section 4.7.6.2 and Section 4.7.7.2. Analysis results guided the selection and implementation of vibration mitigation measures throughout the corridor during construction and operation. These are described in FEIS Section 4.7.6.3 and Section 4.7.7.3. The Metropolitan Council is committed to maintaining LRT systems to minimize avoidable
noise and vibrations. Technical studies for noise and vibration are located in Appendix J of this FEIS. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Appendix E includes background documentation for the ongoing Section 106 consultation process. Appendix G includes the Programmatic Agreement.

**Issue Summary Ph-040. Concerns about impact to St. Paul historic resources and church environment** (5)

**Comments:**

(CCLRP0989) Ph-32

Saint Paul Union Depot - (Refer to p. 3-80; Table 3-11, pp. 3-96, 3-97; pp. 3-97, 3-98, 3-102, 3-104, 3-115 through 118; "Summary" Table 2, pp. 239-240.) The Saint Paul Union Depot, listed on the National Register of Historic Places and included in the Lowertown Historic District, includes not only the building (Head House) but also the public open space in front of it to the north and the Concourse extending south to Kellogg Boulevard. The elevated rail yards have been determined eligible. Because of the location of the station platform on the south side of Fourth Street, the northern part of the public outdoor space will change in character, and the drop-off drive entrances, and access to the drop-off drive, will be lost. The historic use of the building's main entrance - already potentially compromised by the difference in ownership between the Head House and the Concourse - will be further compromised.

(CCLRP0989) Ph-33

University-Raymond Commercial Historic District - (Refer to p. 3-82; Table 3-11, p. 3-88; pp. 3-100, 3-103, 3-104, 3-122; "Summary" Table 2, p. 233.) The University-Raymond Commercial Historic District, including 22 contributing buildings and sites, is a National Register Certified Local Historic District (CLHD), and is also locally designated under the jurisdiction of the Saint Paul HPC. The character and continuity of University Avenue itself is one of the defining features of the district. The split side station buildings at Raymond Station (between Carleton and La Salle Streets) have the potential to alter this character, especially from the point of view of pedestrians on either side, but also for drivers or transit riders, whose views of building facades and sidewalks will be partially blocked.

(CCLRP0989) Ph-36

The intrusion of the catenary cable and poles on the view of its façade diminishes the integrity of Central Presbyterian's setting, feeling, and association. More importantly, compromising the usability of the main entrance of both churches diminishes the integrity of buildings' setting, feeling, and association.

(CCLRP0989) Ph-37

Great care must be taken in the design of the station building relative to the whole of the public outdoor room that extends from the Depot façade to the 1926 Clarence Johnston façade that unifies the buildings on the north side of Fourth Street. The impact of the rail links to the Concourse and the Vehicle Operations and Maintenance Facility on the elevated rail yards structure must also be carefully studied.
With regard to these historic properties and many others in the inventory, we note that the location of the Traction Power Substations (TPSS) has not yet been studied in sufficient detail to assess potential impacts or propose mitigation strategies.

Response Ph-040. The resolution of provisions and/or mitigation measures that are needed to deal with issues related to historic properties (Union Depot, general context and character of historic resources, LRT elements, OMF placement, TPSS) is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS. Historic St. Paul is a consulting party as part of the process. Appendix E includes background documentation for the ongoing Section 106 consultation process.

Issue Summary Ph-043. Impacts and mitigation measures need to comply with neighborhood historic criteria (2)

Comments:
(CCLRP0983) Ph-39
2.4. Franklin Avenue
The effect of increased traffic is a major issue.
Potential effects on the Franklin Prospect Park Historic Neighborhood-need to be careful how propose to route traffic in the area and deal with parking in this area. The impacts and mitigation measures need to comply with historic neighborhood criteria and goals.

(CCLRP0983) Ph-40
Similar to the potential effects on Prospect Park, impacts and mitigation measures need to comply with historic criteria.

Response Ph-043. Traffic issues are being reviewed as part of the ongoing process to minimize impacts.

Section: 3.4 - Report Corrections Needed

Issue Summary Ph-009. Report corrections needed (1)

Comments:
(CCLRP0952) Ph-02
P 3-106, Table 3-12: It appears there are permanent impacts to the Downtown Children's Play Area. That should be reflected in the table and discussed in the text. P 3-108, Table 3-13: Hamm Plaza is owned by the City's Parks and Recreation Department; add Wacouta Commons, bounded by 9th/8th/Wacouta/Sibley. P 3-112, Table 3-14: Add the Children's Play Area ("yes" on short- and long-term effects), Mears Park and Kellogg Mall Park ("no" on short- and long-term effects).
Response Ph-009. The project will avoid any permanent impacts to the Downtown Children’s Play Area.

Issue Summary Ph-010. Report corrections needed (1)

Comments:
(CCLRP0969) Ph-42
Summary of Potential Effects to Cultural Resources from the Key Project Elements - University/Prospect Park Three-car platforms: Add "Bank" after "East"

Response Ph-010. FEIS text will be revised.

Issue Summary Ph-011. Report corrections needed (1)

Comments:
(CCLRP0969) Ph-41
Parks
A figure is needed here to relate these resources to the project.

Response Ph-011. Figure reference will be added in FEIS.

Issue Summary Ph-022. Report corrections needed (3)

Comments:
(CCLRP0989) Ph-34
Saint Louis, King of France Church and Rectory Central Presbyterian Church (Refer to p. 3-80; Table 3-11, pp. 3-93, 3-94; pp. 3-97, 3-98, 3-102, 3-104; "Summary" Table 2, pp. 238-239. N.B. Section 3.6 does not mention the churches.)

(CCLRP0969) Ph-46
Washington Avenue Bridge
There is a lack of clarity between the statements provided in the summary table and the text as to potential for adverse effect; e.g. the summary table provides the statement "Would not be considered an adverse effect" while the text reports that "[p]otential effects have not been identified at this time.

(CCLRP0969) Ph-48
Potential Impacts to Eligible or Listed National Register of Historic Places Properties - U of M Old Campus Historic District (the Knoll) There is a lack of clarity between the statements provided in the summary table and the text as to potential for adverse effect; e.g. the summary table provides the statement "Would not be considered an adverse effect" while the text reports that "[p]otential effects have not been identified at this time.

Response Ph-022. Text is being revised to reflect the tables.
Issue Summary Ph-023. Report clarifications/corrections needed (1)

Comments:
(CCLRP0989) Ph-35
Central Presbyterian Church is listed on the National Register of Historic Places. Saint Louis Church has been determined eligible.

Response Ph-023. Text is being revised to reflect the tables

Issue Summary Ph-029. Report corrections needed (1)

Comments:
(CCLRP0974) Ph-51
• 3-49 (Cedar-Riverside) - Tower Hill Park, Luxton Park, and East River Flats are listed as being in Cedar Riverside; these are actually located in other Minneapolis neighborhoods, Prospect Park and University
• 3-111 - In Table 3-13, Currie Park is incorrectly identified as being in Downtown - it should be listed under University/Prospect Park.
• 3-111 - In Table 3-13, Gold Medal Park is within 0.5 miles of the Downtown East Metrodome station and Hiawatha Connection in Minneapolis.
• 3-112 - In Table 3.14, Currie Park is incorrectly identified as being in Downtown - it should be listed under University/Prospect Park.
• Table 3-9: "Downtown Minneapolis": Please note that historic resources in the 5th Street corridor west of Chicago Avenue were considered in the 106 for the Hiawatha Light Rail line. Any changes to the existing Hiawatha alignment west of Chicago Avenue - as a result of the Central Corridor project - will need to consider those resources.
• Table 3-9: "University/Prospect Park": Please note that commercial properties adjacent to the line along the east side of Cedar Avenue will need further review and consideration in the 106 as potential historic resources. Note as EU-Eligibility Undetermined.
• Table 3-9: "University/Prospect Park": Please note that the Cedar Riverside housing complex, close-by the line along the west side of Cedar Avenue is considered a potential historic resource and will need further review and consideration in the 106 process. Note as EU-Eligibility Undetermined and/or NRE National Register Eligible.
• Table 3-9: "University/Prospect Park": Please note that selected commercial properties adjacent to the line along the south side of Washington Avenue (on the East Bank) will need further review and consideration in the 106 as potential historic resources. Note as EU-Eligibility Undetermined.
• Table 3-9: "University/Prospect Park": Please note that selected industrial properties adjacent to the line along the north side of Intercampus Transitway (on the East Bank) will need further review and consideration in the 106 as potential historic resources. Note as EU-Eligibility Undetermined.
• Table 3-9: "University/Prospect Park": Please note that Prospect Park Historic District is under study at the local level and a decision is expected in 2009. The National Register nomination is also under review by SHPO; a decision is expected in late 2008.

Response Ph-029. The FEIS text has been updated, as necessary.
Issue Summary Ph-032. **Report clarification/corrections needed in regard to historic property effects/analysis** (1)

Comments:
(CCLRP0969) Ph-56
Table 7-1 7-5-7-8 Preliminary Review for Potential Use of Historic Property and related text
This is a confusing, and potentially inaccurate, summary of 4(f) use decisions, relating the determination entirely to the Section 106 Finding of Effect. Further, the lack of determination of effect regarding cultural resources makes it difficult for the reader to comment on these issues.

Response Ph-032. The project proponent is awaiting the determination of effects, which is required to be made by the FTA in accordance with the Section 106 process as defined at 36 CFR 800. This determination of effects is a key component in the determination of whether or not the proposed project would use historic property that is protected by Section 4(f).

Issue Summary Ph-034. **Report corrections needed** (1)

Comments:
(CCLRP0969) Ph-44
Parks, Recreation Areas and Open Spaces Located Within 350 Feet of the Central Corridor LRT Key Project Elements There will be short- and long-term impacts on Northrop Mall and East River Parkway as a result of LRT construction.

Response Ph-034. The text in the FEIS has been revised.

Issue Summary Ph-035. **Report corrections needed** (1)

Comments:
(CCLRP0960) Ph-29
2. Table 3-9 (pages 3-66 and 3-67) and Table 3-11 (pages 3-85 - 3-97) of the SDEIS list potential project effects on historic properties. The project as a whole has substantially greater potential for adverse effects to historic properties than implied in the introduction to the Cultural Resources section on page 3-65. As the project design moves towards completion, a good deal of work remains to be done to ensure that the elements of the project relate well to adjacent historic properties. If this design work is not successful, adverse effects to historic properties may result.

Response Ph-035. The text is being revised to reflect the comments in the tables.
Section: 3.5 - Parklands and Recreation Areas

Issue Summary Ge-002. Report corrections needed (1)

Comments:
(CCLRP0952) Ge-02
P 1-22, Section 1.4, Planning Context, add Saint Paul Downtown Development Strategy and Saint Paul on the Mississippi Development Strategy

P 9-5 City Actions are a bit too literal. Soften language in the following:
- University Avenue Park at Raymond Redevelopment: "A new green space is envisioned in the vicinity of the intersection..."
- Hmong Market Garden: "New public square and open space is envisioned between Arundel..."
- Lexington-Chatsworth Block open space development: "Opportunity for open space to provide a focus..."
- Raymond Village Park development, replace the first comment with: "Potential redevelopment may consider new open space in the area near Raymond and Charles."
- University Avenue Park at Raymond Development: This mistakenly repeats from P 9-5. Delete
- Lexington Park development: "A new green space is envisioned in the vicinity of the intersection of Lexington and University"
- Rondo Square park development: "An opportunity for new open space could be incorporated as a part of future redevelopment of UniDale Mall." to replace the first comment.

P 9-15, Transit effects: Mention the loss of high-frequency service and the impact that may have on the population that uses it to go short distances, including those with disabilities.
P 9-17, Effects on other transportation facilities and services, Impacts fro AA/DEIS mentions on-street parking removal, but is not echoed in the next three columns. It should be.
P 9-22, Mitigation: at the end of the third paragraph, add a list of exceptions to this final statement.

Response Ge-002. The text in Chapter 1 and Chapter 9 of the FEIS was updated to reflect the information requested in this comment.

Section: 3.6 - Visual Quality and Aesthetics

Issue Summary Ae-001. Recommends collaborating with community in regard to visual impacts (1)

Comments:
(CCLRP0952) Ae-1
The City recommends that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase and
encourages active community engagement, including working with Public Art Saint Paul. The section on Visual Quality and Aesthetics (3.6, and text on 3-116, 119, 121, 122, 126, 127 and 132) outline the needs for the TPSs of a one-story building, 20'X40' on a site 45'X80'. Locations of such TPSs are subject to change during final design (although the criteria for such needed changes are not detailed). Further, mitigation treatments for visual impacts would be developed during final design through discussions with affected communities, resource agencies, and stakeholders.

The City believes that greater specificity is needed as to the criteria for designing and landscaping the TPSs. First, there should be at least a menu for possible cladding materials for such facilities. Second, there should be standards set for landscaping techniques. Third, especially for downtown and the Raymond area, possibilities of such facilities being incorporated into existing or future larger buildings should be explored.

In the Cultural Resources section (3.4, Table 3-9, and text on pages 3-98, 99, 100, 102, 103 and 104) the discussion suggests that Three-Car Platform may have additional visual and construction impacts. Mitigation suggests ongoing coordination with project partners, the SHPO and the community toward an agreed solution to design of the stations.

The City recommends that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase, and encourages active community engagement, including working with Public Art Saint Paul.

Response Ae-001. Metropolitan Council recognizes the City’s recommendation that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase, and within an active community engagement, including working with Public Art Saint Paul. The project will include $3 million in public art, which will be incorporated into the new stations. Members of the public are being asked to serve on station art committees to work with the artists who are developing the station art to ensure that it reflects the neighborhood. The 13 LRT station art committees will advise the five artist teams on the culture and history of the community. The committees will assist the Metropolitan Council and its Central Corridor Project Office in planning and promoting public art meetings with the community. The FEIS identifies preferred and alternate locations for the traction power substations in Chapter 2, and the effects and proposed mitigation that may be required are discussed in many sections of Chapter 3 and Chapter 4. Confirmation of the final locations for the TPSS will be coordinated with local property owners. Development of detailed mitigation plans for the TPSS will be completed during final design. TPSS locations were shared with the public during the FEIS open house events in December 2008, and with the BAC, CAC, and other meetings open to the public. The resolution of provisions and/or mitigation measures that are needed to deal with issues related to historic properties, such as the visual effect of Three-Car Platforms is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS.
Issue Summary Ae-002. Use art for community preservation; ensure safe pedestrian and bike access (1)

Comments:
(CCLRP0999) Ae-2
UPDC thinks it is critical to reexamine the plans for mid-street sidewalks, where pedestrians are forced to walk on a 10-foot wide walkway between passing light rail trains and auto traffic. Consideration should be given to providing direct crossings at both ends of each station platform. The goal should be to ensure safe and comfortable access to station platforms for everyone, including people in wheelchairs and mothers or fathers with children in strollers. It is also very important that LRT station design and public art processes be well coordinated and integrated with streetscape planning, so that the stations and public art fit seamlessly into the surrounding area and reflect the unique character of the adjoining neighborhood.

Response Ae-002. Construction of the Preferred Alternative will improve the safety of pedestrians and bicyclists by channeling pedestrian movements to crossing locations at intersecting streets, where curb improvements and pedestrian islands within the street will shield pedestrians and bicyclists from both LRT vehicles and automobile traffic. Landscaping enhancements along the line including trees or public furniture will also help to separate pedestrians from automobile traffic. Access is possible at both ends of the station platforms, and all LRT facilities will be accessible to those who have mobility impairments. As discussed in FEIS Chapter 6, Section 6.3 "Other Transportation Impacts," all pedestrian crossings will be designed in accordance with current design standards and ADA requirements to ensure access and mobility for all. The project will include $3 million in public art, which will be incorporated into the new stations. Members of the public are being asked to serve on station art committees to work with the artists who are developing the station art to ensure that it reflects the neighborhood. The 13 LRT station art committees will advise the five artist teams on the culture and history of the community. The committees will assist the Metropolitan Council and its Central Corridor Project Office in planning and promoting public art meetings with the community.

Issue Summary Ae-003. Concerns about impact of station and overhead cables to views of Capitol (1)

Comments:
(CCLRP0985) Ae-3
Views up the Cedar Street axis to the Capitol will be diminished by the presence of the station and overhead cables, which will encroach on the Cass Gilbert Plan for the Capitol.

Response Ae-003. The streetscape in this location was planned by the landscape architecture firm of Morell and Nichols in 1944 as part of an overall Capitol area landscape plan. Cedar Street was originally intended as tree-flanked boulevards with wide, planted medians. Implementation of this landscape plan began in 1953. In the 1960s, the construction of I-94 bisected Cedar Street. The Cedar Street bridge over I-94 was constructed with a planted center median that maintains the boulevard plan for Cedar Street. The area along Cedar
Street south of I-94 has been extensively redeveloped and is flanked by modern buildings. The proposed LRT track would replace approximately 400 feet of the grass-covered median of Cedar Street beginning at East 12th Street and crossing the Cedar Street Bridge over I-94. South of the Cedar Street Bridge, the remaining approximately 300 feet of the grass-covered median of Cedar Street would be replaced by a center platform station. Consultation is ongoing with the MnDOT Cultural Resources Unit, the CAAPB, and SHPO regarding the effects of the changes that are proposed. Ongoing consultation between all parties and incorporation of minimization and mitigation measures that are being designed into the proposed station layout will ensure that the station is compatible with the historic district. These minimization and mitigation measures are documented in the Programmatic Agreement found in Appendix TBD. The CAAP Board, which oversees the property, is generally supportive of the Project.

**Issue Summary Ae-004. Concerns about impact of station and overhead cables to views of Central Presbyterian Church (1)**

**Comments:**
(CCLRP0989) Ae-4
Further, the catenary cable and poles will be superimposed on the canonic view of Central Presbyterian's façade at the end of Exchange Street, a defining view of Downtown Saint Paul, which Section 3.6 of the SDEIS ignores.

**Response Ae-004.** The resolution of provisions and/or mitigation measures that are needed to deal with the visual effect of LRT elements related to historic properties is outlined in the Programmatic Agreement, which is included in Appendix G of the FEIS. Details of the ongoing Section 106 consultation process are included in Section 3.4 and Chapter 7 of this FEIS.

**Issue Summary Ae-005. Need to determine measures to mitigate visual impact near the U of M; and traffic displacement concerns (1)**

**Comments:**
(CCLRP0969) Ae-5
University/Prospect Park - University of Minnesota Alignment - Mitigations regarding visual impact to the campus and traffic displacement on and near campus as a result of LRT need to determined, in consultation with the University, SHPO, and Mn/DOT, in greater detail. There is a lack of clarity between the statements provided in the summary table and the text as to potential for adverse effect; e.g. the summary table provides the statement "Would not be considered an adverse effect" while the text reports that "[p]otential effects have not been identified at this time."

**Response Ae-005.** Consultation with MnDOT-CRU, SHPO, the FTA, the Advisory Council on Historic Preservation (ACHP), other relevant resource agencies, and identified consulting parties will continue with development and execution of a Programmatic Agreement (PA) (see Appendix G). Other interested parties include the Prospect Park and East River Road.
Improvement Association (PPERRIA), representatives from the University of Minnesota, and Preservation Alliance of Minnesota. The Prospect Park and East River Road Improvement Association (PPERRIA), the Preservation Alliance of Minnesota, and the Advisory Council for Historic Preservation have submitted formal requests to participate as consulting parties in the Section 106 process. Summary tables in the FEIS include all of the latest data regarding historic properties in the Central Corridor study area, and the potential effects. Section 106 documentation is located in Appendix E.

**Issue Summary Ge-004. Ensure LRT station design and public art reflects the unique character of the adjoining neighborhood (1)**

**Comments:**
(CCLRP0999) Ge-04
It is also very important that LRT station design and public art processes be well coordinated and integrated with streetscape planning, so that the stations and public art fit seamlessly into the surrounding area and reflect the unique character of the adjoining neighborhood.

**Response Ge-004.** The project will include $3 million in public art, which will be incorporated into the new stations. It is intended that five artists work with the community to develop public art for integration into station designs. Members of the public are being asked to serve on station art committees to work with the artists to ensure that the art at the station reflects the neighborhood. The 13 LRT station art committees will advise the five artist teams on the culture and history of the community. The committees will assist the Metropolitan Council and its Central Corridor Project Office in planning and promoting public art meetings with the community. Landscaping enhancements along the line including trees or public furniture will also help to beautify the corridor while separating pedestrians approaching the stations from automobile traffic.

**Issue Summary Pp-001. Recommends engaging community to for visual quality integration of streetscape, station design and public art work (1)**

**Comments:**
(CCLRP0952) Pp-51
The City recommends that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase and encourages active community engagement, including working with Public Art Saint Paul.

**Response Pp-001.** The project will include $3 million in public art, which will be incorporated into the new stations. Members of the public are being asked to serve on station art committees to work with the five selected station art artists to ensure that the art at the station reflects the neighborhood. According to the Public Art Saint Paul Web site, Resident Artist Marcus Young is very involved in planning the Central Corridor LRT project.
Section: 3.7 - Safety and Security

Issue Summary Saf-001. Concerns about pedestrian safety and environment (9)

Comments:
(CCLRP0944) Saf-01
In addition to the impacts on the small businesses, there's a serious issues as it relates to pedestrian safety. As you know, the street parking does provide that buffering, real buffer between the pedestrians and the fast-moving traffic, the buses and trucks on University Avenue. And we are very concerned that if you remove that buffer, the margin for error is very, very slight. We're talking about a foot or two by the time a pedestrian starts to cross that road. It's not enough, really, to provide that layer of safety. The last thing we want to do is remove that buffer that does make the pedestrian feel and is, in fact, a safety feature.

(CCLRP0945) Saf-02
If there are going to be areas that are two lanes of through traffic at all times, and we have no opportunity to buffer between 30 mile an hour traffic and pedestrians, then we think that it's important that decorative, wrought iron rail, some kind of visual -- wrought iron, pardon me. Some kind of visual separator, some kind of barrier. When there is absolutely no potential to park there, you're not going to be able to walk across that space anyway. Give us some financial commitment to remediate what that looks like to enhance the safety of the pedestrians using the area.

(CCLRP0999) Saf-03
elimination of most of the on-street parking on University Avenue also raises safety issues for pedestrians on the sidewalks, where they will be walking right next to moving traffic, with no protective barriers currently envisioned. Although this may not actually endanger pedestrians, it is likely to make people feel unsafe, which would then discourage walking along the avenue.

(CCLRP0999) Saf-04
Ensure a high level of safety for cars, bicycles and pedestrians, especially for seniors, handicapped, school children, mothers with strollers, and Midway area shoppers; The need to place the highest priority on pedestrian, bicyclist and traffic safety. The UPDC is pleased that safety has been given a high priority in LRT plans to date. However, we do not believe that the SDEIS has adequately addressed the critical issue of pedestrian safety. We would like to ensure the FEIS fully addresses the need to require LRT plans to result in improved safety, especially for people with limited mobility and at locations with high accident rates, such as the stretch of Snelling from I-94 to University Avenue. Plans for LRT should include defined safety goals agreed upon by the community. In areas of less traffic, retaining current levels of safety might be the goal. In more dangerous areas, the goal must be to achieve improved safety and a reduced number of accidents. To improve pedestrian safety along the Central Corridor, we recommend the following actions, to be coordinated with the cities and counties as appropriate:
A. Enforce pedestrian, bicycle and car traffic laws;
B. Enforce speed limits and traffic signals - including the use of photo enforcement;
C. Install prominent signage to mark pedestrian crossings and to let cars know they must stop for pedestrians and bicyclists in the right-of-way;
D. Add design elements to discourage jaywalking and inappropriate behavior by pedestrians and bicyclists;
E. Explore the possibility of reducing traffic lanes to one in each direction to provide on-street parking as a buffer between pedestrians and traffic; and
F. Install street lights, surveillance cameras and other devices to increase public safety.

For the Midway area that abuts our neighborhood, we are especially concerned about providing safe crossings for pedestrians in and around the shopping area and in the vicinity of senior residences such as Episcopal Homes at Fairview Avenue. Over 150 traffic accidents and two pedestrian deaths have occurred near the proposed Snelling/University LRT station during the last year, a number that is unacceptable to the community. In addressing safety issues for the Snelling-University intersection, UPDC believes the solution must focus on providing safe, efficient, and pleasant crossings for pedestrians, bicyclists, cars, buses, and LRT. The goal should be to calm traffic, not just to move traffic more rapidly through the intersection with a tunnel or widening of Snelling

(CCLRP0988) Saf-05
The Metropolitan Council must commit financial resources from the Central Corridor Project to enhance pedestrian safety on the University Avenue, including such options as physical barriers between the consistent traffic lanes and sidewalk spaces.

(CCLRP0972) Saf-06
I share the University's concern about the safety of pedestrians crossing Washington Av. Nevertheless, I think that trains passing every 7.5 minutes and driven by professional operators pose much less of a threat than does the constant stream of cars, some of which are operated by drivers with limited experience or impairments or both.

(CCLRP0983) Saf-07
In areas where blocks are 600' long, mostly on University Avenue in Saint Paul, the platform will end mid-block and pedestrians will be disadvantaged and possibly put in an unsafe situation if they attempt to cross vehicular traffic to catch a train. The FEIS should identify and evaluate alternatives for addressing this basic pedestrian safety concern and disclose final design alternatives.

(CCLRP0990) Saf-09
Pedestrian safety does not have to be achieved at the expense of businesses losing needed on-street parking. It is a false choice, and disingenuous by the Met Council and the City of St. Paul, to force the community to choose between safety or on-street parking.

(CCLRP0993) Saf-13
Already the 5th Street overpass over 35W serving both bikers and pedestrians is crowded at many times during the day. Getting to and from that overpass is not feasible as an alternative
to a University Avenue overpass without extra stop lights at both 4th Street and University Avenue at 8th Avenue S.E. which would further impede vehicular traffic flow.

**Response Saf-001.** Construction of the LRT will improve the safety of existing pedestrian and bicycle infrastructure along University Avenue. Pedestrians will be channeled to crossing locations at intersecting streets, where curb improvements and pedestrian islands will shield pedestrians from LRT vehicles and automobile traffic. Landscaping enhancements including trees or public furniture will also help to separate pedestrians from automobile traffic. In addition, stations have been designed to be accessible from both ends to ensure riders can enter the stations areas quickly and safely.

**Issue Summary Saf-002.** **Concerns about station security** (1)

**Comments:**
(CCLRP0948) Saf-16
All these stations, they're going to require police enforcement also. You're going to get some low-lifes living in there. You're going stock up with pillows and blankets because you're going to have a lot of homeless living in some of these places.

**Response Saf-002.** Safety for rail users, area residents, local pedestrians and bicyclists, project construction workers, operators and vehicle occupants is an important consideration for the project. The framework for ensuring the highest level of safety to these groups will be established through conformance with the project site safety and health plan, construction contingency plan, Metropolitan Council's Safety and Security Management Plan and the Met Transit Security and Emergency Preparedness plan. Project operations in conformance with these plans will necessarily be closely and continuously coordinated with local area law enforcement, medical, fire, transportation and other organizations with related emergency responsibilities within the corridor.

**Issue Summary Saf-003.** **Concerns about impact to traffic and pedestrian safety, especially at intersections** (1)

**Comments:**
(CCLRP0966) Saf-14
The current Central Corridor design will add congestion and reduce safety, especially at already unsafe intersections, such as Snelling Avenue and University Avenue. Several of Saint Paul's busiest bus routes criss-cross Snelling and University. Consideration of the safety of pedestrians is not apparent, as there is no walking path through Midway Center to connect the bus stop on Snelling to the bus stop on University. Consideration of the safety of pedestrians should be a key aspect in future development of the area. The same safety issue also applies at the intersection of Snelling Avenue and University Avenue, the neighborhood with the most traffic accidents in the state (traffic study). However, at a CCRC meeting in January, Mark Fuhrmann, Metro Transit deputy general manager, was adamant that there was no money to put the rail system underground, insisting that the railway will be safe. However, if the intersection is not currently safe, how will adding a railway make it safe?
Response Saf-003. Traffic impacts, including impacts to pedestrians and bicyclists are discussed in Chapter 6 of the FEIS. Safety and security is discussed in Section 3.7 of the FEIS.

Issue Summary Saf-004. Concerns about electricity effects of project such as stray voltage (1)

Comments:
(CCLRP1012) Saf-17
I see no examination of the electricity effects from this operation; either riding the trains, standing on the platforms. I mean, stray voltage is a serious problem. The farmers have spoken up numerous times in numerous places. There's voluminous amounts of records about stray voltage from electricity. With computers and all the things in the cars, you think -- you need to examine that in this environment review.

Response Saf-004. Potential impacts from electromagnetic interference are discussed in Section 4.9 of the FEIS. Safety is discussed in Section 3.8 of the FIES.

Issue Summary Saf-005. Concerned that centralization of mass transit is vulnerable to terrorism (1)

Comments:
(CCLRP1012) Saf-18
It's -- now, the central lines, this whole thing by allowing this corridor to run into the light rail, you see -- put yourself vulnerable to disruption. What if something were to happen downtown Minneapolis that might knock out the tracks or something? Then you got a whole transportation system to the University, to Minneapolis/St. Paul, the airport, the Mall of America knocked out. You'd be too vulnerable because of centralizing it. In this day and age where terrorism is the key word, centralization is really not a good idea.

Response Saf-005. In the event of a major disruption to system operations, Metro Transit would provide temporary emergency bus service within the Central Corridor to maintain movement of rail transit users until rail traffic is restored.

Issue Summary Saf-006. Concerns about pedestrian safety, especially for persons with mobility issues (1)

Comments:
(CCLRP0986) Saf-15
Central Presbyterian Church and the Church of Saint Louis, King of France have deep concerns for the safety of pedestrians, some of whom have mobility issues, crossing Cedar Street to enter either church. We have had conversations with Met Council staff on addressing these safety concerns, but want to reiterate them. We request that Central Corridor address these safety concerns by: 1. Preserving a traffic-signal for pedestrians at the intersection of Cedar and Exchange, 2. Maintaining or extending the current sidewalk width, 3. Restricting train speed to less than 10 mph in front of our building.
**Response Saf-006.** The Preferred Alternative includes the removal of the traffic signal at Cedar and Exchange Street. The train is not expected to operate above 10 mph in front of the churches as trains will have just departed from the 10th Street Station or will be slowing down to stop at it. As part of responding to concerns expressed by Central Presbyterian Church and the Church of Saint Louis, King of France, a pedestrian only signal will be installed at Cedar and Exchange.

**Issue Summary Saf-007.** **Recommends reducing speed limits to increase safety** (1)

**Comments:**
(CCLRP0972) Saf-19
To improve safety along the Central Corridor, I ask that the following be considered: Reduce the speed limit, Enforce the speed limit - including using photo enforcement, Enforce traffic signals, especially running red lights - using photo enforcement.

**Response Saf-007.** The Metropolitan Council will work closely with the State Department of Transportation, Hennepin and Ramsey Counties and the cities of Minneapolis and St. Paul to review existing speed limits and related enforcement mechanisms along the corridor. These speed limits, traffic controls and enforcement mechanisms will be adjusted as needed to work in concert with LRT operations and in the interests of pedestrian, bicycle and vehicular safety.

**Issue Summary Saf-008.** **Safety should be fundamental/top project goal** (1)

**Comments:**
(CCLRP0969) Saf-20
Safety is fundamental to the successful operations of the Central Corridor.

**Response Saf-008.** Safety for rail users, project area pedestrians, bicyclists, project construction workers, operators and vehicle occupants is an important consideration for the project. The framework for ensuring the highest level of safety to these groups will be established through conformance with the project site safety and health plan, construction contingency plan, Metropolitan Council's Safety and Security Management Plan and the Metro Transit Security and Emergency Preparedness plan. Project operations in conformance with these plans will necessarily be closely and continuously coordinated with local area law enforcement, medical, fire, transportation and other organizations with related emergency responsibilities within the corridor.

**Issue Summary Saf-009.** **Concerns about sabotage to system, and concerns about stray and stationary electricity effects on people** (1)

**Comments:**
(CCLRP0957) Saf-21
The security factor. Having a million people in the Twin Cities area linked to rail lines that can be taken out of commission by sabotage has not been addressed and must be. With more
electricity being used in people's lives, and soon to include electric cars, it is important to analyze and report on the effects that the stray and stationary electricity voltage will have on people who ride and work in and around the LRT system.

**Response Saf-009.** The FEIS has been revised to include information that Central Corridor LRT project operations may be adversely impacted by the loss of electrical power due to a catastrophic event. The system does provide limited emergency backup power if one traction power station goes out of service but not if several are impacted. In the event that the system is temporarily out of operation, Metro Transit would provide the necessary emergency bus service to transport rail users within the corridor. See Section 4.9 which discusses Electromagnetic Fields.

**Issue Summary Saf-010. Analyze impacts of re-routing Bus Route 16 and plan mitigation to ensure pedestrian safety (1)**

**Comments:**
(CCLRP0983) Saf-10

- Analyze the impacts of re-routing the #16 and develop appropriate mitigation measures to ensure pedestrian safety and a suitable pedestrian environment for those who may be required to walk greater distances.

**Response Saf-010.** While the frequency of scheduled service for the Route 16 would be changed, the Route 16 bus would continue to serve all the current stops along the current route. The introduction of LRT service running at 7.5 minutes during the peak hour periods and the additions of re-routed bus routes and new circular bus routes (Route 60 and Route 83) help to improve end-to-end run times along the corridor. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in the FEIS. Construction of the LRT will improve the existing pedestrian and bicycle infrastructure along University Avenue, and improve the safety of pedestrians and bicyclists through implemented design guidelines and ADA required design guidelines. FEIS Section 6.3 discusses pedestrian safety issues associated with construction and operation of the Preferred Alternative. Section 3.8 discusses transit-dependent populations.

**Issue Summary Saf-011. Report correction in regard to UMPD responsibilities (1)**

**Comments:**
(CCLRP0969) Saf-22

University/Prospect Park  UMPD also handles crime prevention services.

**Response Saf-011.** The FEIS text has been updated to reflect the role of the UMPD in handling crime prevention services in the University/Prospect park area.
Issue Summary Saf-012. **Report correction in regard to UMPD responsibilities** (1)

**Comments:**
(CCLRP0969) Saf-23
Existing Conditions - UMPD provides public safety and security services on campus. They should be mentioned early on in the summary much in the same way as the Metropolitan Transit Police are handled.

**Response Saf-012.** The existing conditions portion of the FEIS section on safety and security has been updated to adequately reflect UMPD's role in public safety and security services on the University campus.

Issue Summary Saf-013. **Report correction in regard to Minneapolis Police Precincts responsibilities** (1)

**Comments:**
(CCLRP0969) Saf-24
University/Prospect Park - Minneapolis Police Precincts One and Two also provide crime prevention services for Prospect Park.

**Response Saf-013.** Comment noted. The FEIS text has been revised to reflect the crime prevention role that Minneapolis Police Precincts 1 and 2 provide for the Prospect park neighborhood.

Issue Summary Saf-014. **Report clarification suggested** (1)

**Comments:**
(CCLRP0969) Saf-08
University/Prospect Park - Last statement would be more accurate with the following edits: "A pedestrian tunnel under Washington Avenue between the parking ramp on the north and the University Medical Center on the south provides an alternative for safe crossing in the vicinity of Union Street."

**Response Saf-014.** Comment noted.

Issue Summary Saf-015. **Concerns about impacts to pedestrian and bicyclist safety in U of M area** (1)

**Comments:**
(CCLRP0969) Saf-11
University of Minnesota Alignment - Traffic displacement may make the streets surrounding Washington Avenue unsafe for pedestrians and bicyclists.

**Response Saf-015.** Traffic impacts, including impacts to pedestrians and bicyclists are discussed in Chapter 6 of the FEIS.
Section: 3.8 - Environmental Justice

Issue Summary Ci-009. Impact to minority communities (1)

Comments:
(CCLRP0971) Ci-09
LRT will also have a negative impact on the communities of color who live adjacent to the line. Census tract data show very clearly that, even in neighborhoods with overall white majorities, those blocks that are adjacent to University Avenue mostly have nonwhite majority populations. During construction, the people living on these blocks will have to put up with all the noise, traffic disruptions, and extra cars using their streets both for parking and as a detour around the construction.

Response Ci-009. The FEIS includes an enhanced discussion of environmental justice issues and concerns as they relate to the construction and operation of the Central Corridor LRT (Section 3.8). Short-term construction impacts are inevitable, and will be felt by all residents and neighborhoods immediately adjacent to the alignment. Construction of the project will be staged in order to reduce construction-related impacts to adjacent neighborhoods and communities. Additionally, Best Management Practices will be deployed during construction to mitigate against potential impacts to adjacent residents and neighborhoods.

Issue Summary Ej-001. Concerns about disproportionate impact to sensitive communities (14)

Comments:
(CCLRP0962) Ej-01
There are serious problems Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor. These problems center around underestimating the negative impact the line will have on the minority, poor, and transit-dependent populations that live along the corridor. The report underestimates the negative economic impact of the LRT because the report authors incorrectly compared the Central Corridor population with the total population of Hennepin and Ramsey Counties.

While the report claims that the minority and low-income population will not bear a burden that is "... More severe or greater in magnitude than the impact felt by the community at large" (p.138), the fact that the minority share of the Corridor population is twice as high as the rest of Hennepin and Ramsey Counties, and the poverty rate is more than three times as high means that minorities and poor people will be bearing a more severe and greater impact than the community at large. Oddly, nothing in the methodology section shows how the report authors came to this truly startling conclusion.

To say the" ... negative impacts [of the Central Corridor LRT] are not disproportionately borne by sensitive communities; rather they are borne by all communities along the corridor" (SDEIS p. 138) is wrong on its face, since clearly "sensitive communities" are a disproportionate share of the Corridor population! While it is true that "Benefits of the
project, including increased mobility along the Central Corridor, would be experienced by all populations," (SDEIS, p. 138) potentially an even larger share could accrue to these sensitive populations, if the line were built with greater sensitivity to the needs of these sensitive communities.

As for the stations at Hamline, Victoria, and Western Avenues, referring to them as "proposed stations" only emphasizes the notion that the stations may never be built. This language implies that building the infrastructure for these stations is really a way to quiet the transit-dependent communities by offering to meet their needs while assuring that ethnic minorities and the transit dependent population are not likely to get the stops they want and need.

I believe that there are some serious problems with the way the data in the SDEIS section on Environmental Justice is presented. The way that the data are presented they appear to underestimate the importance of the negative impact of the LRT because the authors compare the population in all of Hennepin and Ramsey County with the study area. In fact, the correct comparison would have been the non-study portion of those two counties and the study area.

The fact is that because the minority population in the corridor is at twice the rate of the minority population in the rest of Hennepin and Ramsey County, even if the benefits are evenly distributed throughout the study area, the negative impact will be felt more severely by the minority population because the minority is a larger share of the study area than of the two counties.

The same thing appears in the estimate of poverty. If you segregate the data showing the study area and the non-study area of the two counties, what you find is that the poverty rate in the study area as presented is three times the poverty rate in Hennepin and Ramsey County areas.

Surely it's hard to imagine that this isn't important. It's not highlighted and, in fact, the report says the poverty rate is twice the rate in the study area compared with all of Hennepin and Ramsey County. It's three times the rate of the rest of Hennepin and Ramsey County.

To say that the negative impact of the central corridor LRT are not disproportionately borne by sensitive communities, rather they are borne by all communities in the corridor is wrong in its face since clearly sensitive communities are disproportioned in share in corridor population.

While it's true that benefits of the project, including increased mobility along the central corridor, would be experienced by all populations, potentially an even larger share could be shared to these sensitive populations if the line were built with greater sensitivity to the needs of these community.

As for the stations at Hamlin, Western and Victoria, the report refers to them as proposed stations. That only emphasizes that these stations may never be built. The language implies
that building the infrastructure for the stations is really a way to quiet the transit-dependent popula

tions and that they're not likely to get the stops they want or need.

If we fail to build at least one of these stations at the time the LRT is constructed, I'm afraid that we're going to repeat and strength the results that happened in the Roger neighborhood when I-94 was built.

(CCLRP1015) Ej-12
The SDEIS asserts that, because the central corridor as a whole has a greater percentage of low-income and minority persons than counties in which it is located, there aren't any adverse impacts that are borne unequally throughout the corridor, and it also asserts that any benefits will be shared equally. Consequently, SDEIS concludes that no official mitigation measures are needed. The DCC disagrees and contends that issues of transportation equity for environmental justice neighborhoods have not been adequately addressed.

(CCLRP0978) Ej-14
Based on census statistics from 2000, the Minnesota Center for Environmental Advocacy found that the population at (around or near or adjacent to) these stations is 82 percent minority versus an average 41 percent minority population near all other stations (see attached spreadsheet Central Corridor LRT Minority Populations by Stations Sheet 1). These communities are also living at 70 percent of the median income of Ramsey County (see attached spreadsheet Central Corridor LRT Median Household Income by Stations Sheet 2). As stated in the SDEIS, "22 percent of the households in the Study Area are without a car, thus, a substantial percentage of the population depends on transit to get to work, health care facilities, shopping destinations, schools, and recreational facilities."2 Also documented in the SDEIS is the Central Corridor Population by Segment is that the Midway East Segment has the highest population density of any other segment along the line.3 These statistics demonstrate the need to build stops at Hamline, Victoria and Western to serve the densely populated, minority, low-income, transit-dependent communities that will otherwise not experience the benefits of the Central Corridor LRT. The current plan for stations does not adequately meet the stated purpose and need to "provide better transit service and capacity to the diverse population of existing and future riders in the corridor."

(CCLRP0978) Ej-15
Furthermore, the current project scope of the Central Corridor LRT does not meet the standard for addressing the three fundamental environmental justice principles listed on the Environmental Justice web site of the U.S. Department of Transportation's web site.

(CCLRP0991) Ej-17
A case for equal access by building additional stations at Hamline Avenue, Western Avenue, and Victoria Street: The SDEIS claims "the analysis determined that no impacts associated with the proposed changes to the central corridor due to LRT would be disproportionately borne by minority or low-income communities" (Central Corridor LRT Project SDEIS pg 3138) as a result of the omission of stations at Hamline, Victoria, and Western located in the Midway East Segment of the Central Corridor LRT. Based on census statistics from 2000, one of our allies the Minnesota Center for Environmental Advocacy has found that the
population at these stations is 80% minority versus the average minority population of all other stations is 39% (see attached spreadsheet Central Corridor LRT Minority Populations by Stations Sheet I). 1 WINNER OF THE FORO FOUNDATION'S LEADERSHIP FOR A CHANGING WORLD AWARD, 2004 attached spreadsheet Central Corridor LRT Minority Populations by Stations Sheet I). These communities are also at 70% of the median income of Ramsey County (see attached spreadsheet Central Corridor LRT Median Household Income by Stations Sheet 2). The SDEIS also documents that the Midway East Segment of the Central Corridor Population has the highest population density of any other segment along the line. By these statistics, the minority, low income, transit dependent communities at Hamline, Victoria, and Western are being left out of the benefits of the Central Corridor LRT and does not meet the stated purpose and need to "provide better transit service and capacity to the diverse population of existing and future riders in the corridor" (Central Corridor LRT Project SDEIS, June 2008, pg 1-4).

(CCLRP0971) Ej-19
The bottom line is that the adverse impacts from LRT will be borne disproportionately by people of color. In such cases, federal law requires mitigation, but there is no guarantee of sufficient money to correct the inequity. It's the same old story - shove this down the throats of those who are least able to fight back. That's what happened to the Rondo neighborhood, and that's what the Metropolitan Council wants to do with LRT.

You need to revise the SDEIS to reflect the truth - that LRT will have disproportionate adverse impact on communities of color. That is the minimum requirement of federal law.

(CCLRP0965) Ej-21
How, in good faith, can the document articulate that the minority and low income population would not be served under the "no build" when the # 16 bus is the most used bus and is serving the low income and minority population right now. In fact, the #16 Bus for many years, as been the bread and butler line for the entire system. Yet your documents opine that no disproportionate impacts are perceived with other options.

(CCLRP0965) Ej-22
The proposed infill stations should have been included in the project from day one and the omission of the 3 stations was an overt action and hints of social selection and subtle gentrification rather than a transit decision.

(CCLRP0965) Ej-23
Because this project is primarily in low/moderate income areas, it must be reviewed by how it impacts the area vs. the City and County and Metro Region as a whole. Currently, it compares the low/moderate income area against itself.

(CCLRP0980) Ej-24
As SDEIS tables 3-15 and 3-16 show, the minority population and the population below the poverty level in the corridor area is significantly higher than in the entirety of Ramsey and Hennepin Counties. Therefore, disproportionate impacts of the CCLRT project will by their very nature have a disproportionate impact on low-income and minority communities of
Hennepin and Ramsey Counties. The statement from page 1-138 quoted in the prior paragraph does not account for this aspect of the Executive Order.

(CCLRP0980) Ej-25
The failure of the CCLRT planning process to comply with environmental justice requirements was identified in comments submitted responding to the DEIS by the Central Corridor Equity Coalition. The potential oversight of these requirements was echoed in a letter the Central Corridor Project Office from Kenneth A. Westlake of NEPA Implementation on the date of March 18, 2008. Neither of these comments, nor many other formal and informal comments made of the same nature to Metropolitan Council staff, received attention in the SDEIS. Before the CCLRT project enters final design, its disproportionate impacts on environmental justice communities must first be acknowledged, and must be mitigated in accordance.

(CCLRP0969) Ej-34
Environmental Justice - University of Minnesota Alignment - This discussion does not address the requirements of the Environmental Justice executive order. There is no discussion or conclusion regarding the presence of low income or minority populations nor high or disproportionate effects to those populations.

(CCLRP0980) Ej-36
Section 3.8.6 of the SDEIS, which makes the (apparently unsubstantiated) statement that "minority or low-income populations within the study area are not subject to any disproportionate impacts associated with the development of the Central Corridor LRT; furthermore, the benefits of the project are fairly distributed. No mitigation is proposed at this time." We believe that this statement is inaccurate, and accordingly, that the SDEIS violates environmental justice standards required by state and federal law.

Response Ej-001. Comment noted. Transportation equity issues, both in terms of construction and operation of the Central Corridor LRT with respect to all individuals, communities, and neighborhoods immediately adjacent to the project area are a critical concern for the Metropolitan Council. The methods of analysis used for the environmental justice analysis contained in the SDEIS were based on approved federal reporting requirements. Following publication of the SDEIS and from the public comments received, the Metropolitan Council and the Federal Transit Administration have revisited these reporting requirements, and an enhanced discussion of impacts to environmental justice communities is included in the FEIS.

Issue Summary Ej-005. Concerns about negative impact to environmental justice communities (1)

Comments:
(CCLRP0999) Ej-08
This will negatively impact some of St Paul's most low-income, ethnically diverse, and transit dependent populations, raising environmental justice issues related to equitable transportation access and economic development opportunities that we believe are not
adequately addressed by the SDEIS. In fact, the SDEIS claims there is no disproportionate impact on sensitive populations as a result of the omission of stations at Hamline, Victoria and Western and the reduction of current #16 bus frequencies, so no mitigation will be required.

UPDC emphatically disagrees with the SDEIS claims that:
- The omission of stations at Western, Victoria and Hamline does not disproportionately impact minority or low-income communities;
- The benefits of the project, including increased mobility along the corridor, would be equally experienced by all populations;
- The current plans fulfill the environmental justice requirements of Executive Order 12898; and
- Therefore no mitigation is required.

We believe it is essential that the FEIS re-examine these claims and respond to analysis by the District Councils Collaborative (See Appendix C -- DCC research report, Additional Stations: Making the Case for Western, Victoria and Hamline, November 2007) and the Transportation Equity/Stops4Us Coalition (See Appendix D - Map of .-mile station spacing pattern in residential areas -- Spreadsheet of minority and low-income population percentages at three missing station areas as compared to currently planned station areas). These studies and charts clearly indicate that the predominantly minority and low-income populations around Western, Victoria and Hamline will suffer disproportionate negative impacts if the project does not include the building of stations at these locations. These environmental justice issues are not adequately addressed in the SDEIS.

Transportation inequities that are not adequately addressed in the SDEIS include:
- Stations a mile apart and reduced bus frequencies will result in reduced mobility and negative time saving benefits due to longer walks and/or longer waits to access transit for people who live within a .-mile of the three missing stations. The large percentage of low-income, ethnically diverse, and transit-dependent populations in this area are exactly the people the environmental justice laws are designed to protect from disproportionately high negative impacts. Yet these issues are not addressed in the SDEIS, and no mitigation is proposed. that the percentage of the population below the poverty level in the mile areas around Western, Victoria and Hamline is 77%, compared to 45% in the .-mile areas around the currently planned stations from the West Bank to Rice. Similarly, the percentage of minorities living in the missing station areas is 80%, while the minority population around planned stations from the West Bank to downtown St. Paul is 39%. The omission of the three stations and reduction in #16 bus service presents a clear pattern of discrimination, results in reduced levels of transit service, and imposes a disproportionate burden of negative impacts on the residents and businesses around these station locations. (See attached spread sheet - Appendix E)

Providing additional bus service by adding #83 bus on Lexington and #60 circulator from Victoria to Hamline and south to St Clair does not provide adequate mitigation for residents and businesses near Western, Victoria and Hamline. The Metropolitan Council Response to the DCC Report (January 2008) claims that these additional bus lines will provide access to
transit within a .-mile of most locations. But this does not offset the lack of direct access to LRT and the greatly reduced service of the #16 bus, which has the second highest ridership in the entire Twin Cities metro area.

If these three stations are not built, the FEIS should address the need for the LRT project to provide some alternative mitigation, such as maintaining 10-15 minute service for the #16 bus, to offset the negative economic impacts on local businesses and non-profits. The high percentage of ethnically diverse small businesses make this an environmental justice issue that must be addressed in the FEIS.

Furthermore, we believe the decision to include only the infrastructure for the three stations in the project does not meet the central NEPA Environmental Justice principles:

Response Ej-005. Comment noted. Transportation equity issues, both in terms of construction and operation of the Central Corridor LRT with respect to all individuals, communities, and neighborhoods immediately adjacent to the project area are a critical concern for the Metropolitan Council. The Metropolitan Council evaluated future infill stations at Hamline Avenue, Western Avenue, and Victoria Street to address community access and mobility issues in the Midway East Segment and to respond to community concerns regarding station spacing. This analysis analyzed including these stations as part of the current project. The analysis is discussed in SDEIS Section 3.8.4.2. The Preferred Alternative includes underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in the FEIS. Additionally, the methods of analysis used for the environmental justice analysis contained in the SDEIS were based on approved federal reporting requirements. Following publication of the SDEIS and the public comments received, the Metropolitan Council and the Federal Transit Administration have revisited these reporting requirements. An enhanced discussion of transit-dependent populations and impacts to environmental justice communities is included in the FEIS.

Issue Summary Ej-008. Concerns about negative impacts to environmental justice communities due to loss of on-street parking (3)

Comments:
(CCLRP0990) Ej-26
The SDEIS does not address the impact of the 80%-90% loss of parking on University Avenue. We believe this will hurt many small businesses that depend on on-street parking and will contribute to the gentrification of the community, disproportionally impacting low-income communities and people of color. This is an environmental impact that needs to be fully disclosed and addressed by the Met Council as required by NEPA.

(CCLRP0983) Ej-27
The entire corridor will be adversely impacted by loss of on-street parking. The adverse impacts may be more acute in areas where off-street parking options are limited and in areas where infrastructure for LRT stations is provided, but the stations are not built out. The
unbuilt stations at Victoria and Western would serve commercial areas with high concentrations of minority and immigrant businesses. There would be disproportionate impacts on minority business populations located near these intersections.

(CCLRP0983) Ej-29
If stations at Western, Victoria, and Hamline are not built as part of the project, environmental justice populations would experience the adverse impacts of on-street parking without the balancing benefits of an LRT station. The FEIS should analyze and document the disproportionate impact and propose appropriate mitigation measures.

Response Ej-008. Comment noted. Following publication of the SDEIS and from the public comments received, an enhanced discussion of impacts relating to parking and environmental justice communities is included in the FEIS.

Issue Summary Ej-009. Concerns about changes to bus route #16 and related impact to environmental justice communities

Comments:
(c) The delay in the receipt of benefits would be further exacerbated by the reduction in the frequency of the Route #16 bus service, which reduces access to transit. According to the SDEIS, off-peak frequencies would be cut by 67 percent and peak frequencies would be cut by 50 percent. This cut in service decreases access to transit service and makes it more difficult for residents and businesses to realize LRT benefits when they are located half way between stations spaced one-mile apart. The service cuts also fall disproportionately to low-income, #16 transit riders...Proposed #16 frequency cuts are yet another disproportionate impact deserving full consideration in the SDEIS. The FEIS should investigate whether or not similar disproportionate impacts would fall upon minority populations.

The FEIS must provide a more complete analysis of Environmental Justice implications of these stations, reduction in #16 bus frequency, and the CCLRT project as a whole and identify mitigation strategies that address Environmental Justice principles outlined by the U.S. Department of Transportation.

The SDEIS does not fully disclose the impacts that a reduction in the #16 frequency will have on riders who are disproportionately low-income and transit dependent. The FEIS should include a thorough analysis of impacts and propose appropriate mitigation strategies.

The Route 16 bus service is utilized by an especially high number of low income people, and thus the remaining plans for reductions in its service will disproportionately affect a low-income population. This statement is especially true given the limited access that many low-income residents would have to the CCLRT given the spacing of stations.
Response Ej-009. Comment noted. Transportation equity issues, both in terms of construction and operation of the Central Corridor LRT with respect to all individuals, communities, and neighborhoods immediately adjacent to the project area are a critical concern for the Metropolitan Council. While the frequency of scheduled service for the Route 16 would be reduced, the introduction of LRT service running at 7.5 minutes during the peak hour periods and the additions of re-routed bus routes and new circular bus routes (Route 60 and Route 83) help to improve end-to-end run times and overall transit capacity in the corridor. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in Section 3.8 of this FEIS.

Issue Summary Ej-010. Concerns about changes to local property taxes and related disproportionate impacts (1)

Comments:
(CCLRP0980) Ej-35
Analysis was not given to the disproportionate impacts this project may have regarding local property taxes, and no mitigation was considered. If property taxes were to increase, which is suggested in the SDEIS on pages 5-2 in the first full paragraph, low-income residents of the corridor would be disproportionately impacted because they are less likely to have disposable income to cover these increases, and as a result they would be more likely to be displaced.

Response Ej-010. Comment noted. An enhanced discussion of impacts related to property development is included in Section 3.2 and Chapter 5 of this FEIS.

Issue Summary Ej-011. Concerns about disproportionate impacts to minority-owned business along east end of corridor, due to construction and permanent loss of parking (1)

Comments:
(CCLRP0980) Ej-39
An especially high number of small businesses along the east end of the corridor are owned by minorities. These businesses are more likely to be impacted by project construction and loss of parking incurred at completion. They are less likely to survive the loss in business that regularly occurs when a commercial corridor is under construction and more likely to be reliant on the on-street parking that is, for the most part, being permanently lost due to LRT construction. These potential impacts were not analyzed.

Response Ej-011. Comment noted. As part of the public outreach and involvement efforts of the Metropolitan Council, efforts have been made to engage area businesses on project activities, scope, and schedule. To help promote the interests of businesses along University Avenue and throughout the corridor, the Business Advisory Council was established to promote the interests of business and advise the Central Corridor Management Committee on best practices during construction to mitigate disruptions during construction. Recognizing the potential LRT stations have to enhance growth and development around station areas, the City of St. Paul City Council adopted the Central Corridor Development Strategy as part of the city's comprehensive plan, a document intended to provide guidance and development
standards throughout the entire Central Corridor LRT project area to equitably distribute development benefits. An enhanced discussion of impacts related to property development is included in the FEIS.

**Issue Summary Ge-005. Need to account for environmental justice, economic and developmental effects** (1)

**Comments:**
(CCLRP1016) Ge-05
Neighbors will need to move across University freely and not have (inaudible). The local bus service needs to continue. We feel that social effects, environmental justice, economic and developmental effects are not being taken into account.

**Response Ge-005.** Transit effects are discussed in Section 6.1 of the FEIS. Social impacts, including impacts to environmental justice communities, are discussed in Chapter 3 of the FEIS. Cumulative impacts are discussed in Chapter 9 of the FEIS.

**Issue Summary Np-013. Disagrees with analysis in regard to disproportionate impacts** (1)

**Comments:**
(CCLRP0965) Np-03
Citations in Document (pages) 3-138 thru 3-154; 4-60, 6-32 - The presenting problem(s) - The SDEIS states that "These concerns (parking, accessibility, elder mobility, safety, community cohesion and neighborhood preservation) have been considered and the analysis determined that minority or low-income populations within the study area are not subject to any disproportionate impacts associated with the development of the Central Corridor LRT; furthermore, the benefits of the project are fairly distributed, No mitigation is proposed at this time," This is not an acceptable analysis or response,

**Response Np-013.** Transportation equity issues, both in terms of construction and operation of the Central Corridor LRT with respect to all individuals, communities, and neighborhoods immediately adjacent to the project area are a critical concern for the Metropolitan Council. The methods of analysis used for the environmental justice analysis contained in the SDEIS were based on approved federal reporting requirements. Following publication of the SDEIS and from the public comments received, the Metropolitan Council and the Federal Transit Administration have revisited these reporting requirements, and an enhanced discussion of impacts to environmental justice communities is included in the FEIS.

**Issue Summary Pp-003. Concerns that mitigation adequately benefits all communities** (1)

**Comments:**
(CCLRP0965) Pp-54
All mitigation and attention cannot be focused on the West side of the river, we must demand $$$, more than talk, for those we represent.
Response Pp-003. The project engineers and planners studied mitigation strategies on a case-by-case basis. The FEIS addresses impacts identified in the Draft Environmental Impact Statement and Supplemental DEIS and mitigation proposed to address the impacts in each topical section and in a summary table located in the Executive Summary.

Issue Summary Pp-069. Outline fair mitigation throughout corridor (1)

Comments:
(CCLRP0991) Pp-70
Bring the community involvement to completion by including the three stations at Hamline, Victoria, and Western to the Central Corridor LRT Line, maintaining bus service and providing mitigation to protect businesses and property owners in the community.

Response Pp-069. The Preferred Alternative includes future infill stations at Western Avenue, Victoria Street, and Hamline Avenue with all subsurface infrastructure for these stations to be built. Route 16 service on University Avenue will be maintained, but reduced from every 10 minutes to every 20 minutes while new routes are being added to bring riders north and south of University Avenue to the corridor. Route 83 and Route 60 will also continue to serve the community. Existing transit service and proposed changes are described in Chapter 6. The anticipated effects to the businesses and property owners along the Central Corridor LRT alignment are described in Section 3.2 and in Chapter 5 of this FEIS, along with proposed mitigations.

Issue Summary Pp-071. Outline fair mitigation throughout corridor (1)

Comments:
(CCLRP0983) Pp-71
• Detail mitigation strategies for business owners who lose access to their properties not only here, but elsewhere on the corridor.

Response Pp-071. Section 6.3 describes specific access impacts to businesses and proposed mitigation. Section 3.3 describes all right of way needs and general impacts to access. Impacts related to temporary changes to parking and access will be mitigated by providing development of a Construction Outreach Coordination Plan during final design. The plan will detail planned activities during construction, partnerships, and specific programs to assist local businesses and residents affected by construction and methods to minimize adverse impacts during construction of the project.

Issue Summary EJ-40. Concerns that the SDEIS fails to meet the legal requirements of Executive Order 12898 (1)
Comments:
(CCLRP0982) EJ-40
I represent that Aurora/St. Anthony Neighborhood Development Corporation, the Community Stabilization Project and St. Paul Chapter of the National Association for the Advancement of Colored People. I am writing to set forth my clients' position regarding the serious deficiencies of the proposed Central Corridor Light Rail Transit ("CCLRT") project's Supplemental Draft Environmental Impact Statement ("SDEIS"). If these deficiencies are not remedied in the Final Environmental Impact Statement, my clients intend on taking formal legal action and seeking an injunction to compel compliance with applicable state and federal law.

I. The SDEIS Fails To Recognize The CCLRT's Disproportionate Impact On Low Income And Minority Populations.

The central failure of the SDEIS is that it is based entirely upon the conclusion that the CCLRT does not have a disproportionate impact on low income and minority populations. This conclusion is incorrect. As clearly set forth in the DEIS, this project runs directly through a series of neighborhoods that are all predominately low-income and/or minority. Further, your conclusion that the CCLRT does not trigger environmental justice requirements is contrary to the plain language of the USDOT Final Order implementing Executive Order 128908.

The USDOT Final Order mandates that the Operating Administration and shall determine whether programs, policies, and activities for which they are responsible will have an adverse impact on minority and low-income populations and whether that adverse impact will be disproportionately high. The Final Order states that "disproportionately high and adverse effect on minority and low income populations" means that either the effects are

(1) predominately borne by a minority population and/or a low-income population, or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population. See 62 F.R. 18380.

In this case, DOT has failed to recognize that environmental justice requirements are triggered so long as the effect of the CCLRT are "predominately borne by a minority population and/or low-income population." This failure maybe based on your misunderstanding of the Final Order (and misquote of the Final Order) that is set forth on page 3-138 of the SDEIS. There, under section 3.8.2, you state that disproportionate or adverse impacts to minority or low-income populations are defined as those impacts that are predominantly borne by a minority or low-income population AND are more severe or greater in magnitude than the impact felt by the community at large." (Emphasis added). Your addition of the conjunctive in lieu of the disjunctive "or" has resulted in your erroneous conclusion that simply because the benefits of the project are borne by all communities along the corridor, no special mitigation measures beyond those already proposed are necessary. See Summary of Key Findings 3.8.1.
There is no dispute in this case that in fact the Central Corridor is dominated by people of color and low income communities. In fact, based upon independent research, my clients have determined that within a quarter mile radius of the proposed stations, approximately 40% of the population is of color. Further, within a quarter mile radius of those corridor areas that are not intended to have a station, approximately 80% of the population is of color. Moreover, both the DEIS and SDEIS contain ample proof that in fact the impacted communities are disproportionately minority and/or low-income. Accordingly, your conclusion that this project does not trigger Environmental Justice requirements is clearly erroneous.

II. The SDEIS Fails To Consider Whether This Project May Go Forward In Light Of The DOT's Final Order.

Because you have failed to properly identify the disproportionate impacts of the CCLRT project on low income and minority populations, you also failed to address the requirements of the DOT's Final Order with respect to possible alternatives to the Locally Preferred Alternative ("LPA"). The DOT's Final Order provides that Operating Administrators and other responsible DOT officials ensure that any of their respective programs, policies or activities that will have a disproportionately high and adverse effect on protected populations can only be carried out if:

1. a substantial need for the program, policy or activity exists, based on the overall public interest; and

2. alternatives that would have less adverse effects on protected populations and that still satisfy the need addressed by the project either:

   i. would have other adverse social, economic, environmental or human health impacts that are more severe, or
   ii. would involve increased costs of extraordinary magnitude.

Importantly, your consideration of the above-stated matters must be appropriately documented in the environmental impact statement or other NEPA document prepared for the program, policy or activity, or in other appropriate planning or program documentation. Again, you have failed to document in the SDEIS whether the alternatives to the LPA satisfy DOT's own internal guidance. This analysis is required by law, and it must be set forth in writing. If you have in fact completed this analysis, please provide me with that documentation. If you disagree with my analysis of the SDEIS, I ask that you provide me with the page numbers of the SDEIS that contain this required analysis.

III. The SDEIS Fails To Even Consider Environmental Justice Requirements With Respect To Mitigation Of Impacts On Low Income And/Or Minority Populations.

DOT's guidance requires that the Operating Administrators and other responsible DOT officials ensure that any of their respective programs, policies or activities that will have a disproportionately high and adverse effect on minority populations or low-income
populations will only be carried out if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effect are not practicable. In determining whether a mitigation measure is practicable, the social, economic (including costs) and environmental effects of avoiding or mitigating the adverse effects will be taken into account.

With respect to the CCLRT, you have failed completely to even discuss mitigation measures. Instead, due to your erroneous conclusion that the CCLRT does not disproportionately impact a minority and/or low-income population, you have concluded that consideration of mitigation measures is not necessary. This failure of analysis gives no assurances to the affected communities that you have fully considered the impacts of the LPA. For example, in the SDEIS section on "Economic Effects", you state that "It is also expected that new development in this Central Corridor LRT Study Area would capture an increasing share of residential and employment growth as densities increase. Focused development in areas with existing infrastructure accrues benefits to the taxing jurisdictions." See SDEIS, pp. 5-2. Obviously, increased taxes in the Central Corridor is a negative impact that will disproportionately affect minority and/or low-income individuals and businesses. As such, you are required to appropriately analyze mitigation of this impact. Given that aforementioned reality that this project is cited in a low-income and minority community, it is clear that you must ensure that you consider mitigation before moving forward with the LPA. Possible mitigation measures that should be considered include, but are by no means limited to:

1. Funds set aside to address business interruption;
2. Property tax increase moratorium;
3. Guarantees of jobs for local minority and low-income individuals and businesses; and
4. Grants to protect existing, locally owned businesses.

I offer these mitigation measures again as many were raised during the comment period for the DEIS, but it is apparent that these mitigation measures were never considered.

Conclusion

If the final EIS fails to adequately recognize these disparate impacts, my clients will take timely legal action and seek an injunction to halt the Central Corridor project construction. I close with my clients' publicly supported mission statement:

We recognize the requirement, under the National Environmental Policy Act, for disproportionate impacts to low-income and minority communities to be disclosed for a federally-funded transit project to go forward. We are certain that, in disputing the claim made by the Metropolitan Council that 'the benefits of the project are fairly distributed' and its sufficiency in addressing our issues, we are upholding the law as it is intended. Until the Metropolitan Council agrees to address our concerns adequately and give our community equal benefits, we oppose the Central Corridor Light Rail Transit Project and will stand against its construction through our community.
I ask that you respond in writing to my clients’ concerns no later than September 1, 2008. I look forward to hearing from you.

**Response EJ-012.** Section 3.8 of this FEIS details the methods used to conduct the environmental justice analysis, the project’s compliance with federal and state directives and regulations, and the findings. The analysis was conducted to determine whether impacts of the project were predominantly borne by minority and low-income populations, or whether impacts were appreciably more severe or greater in magnitude than adverse effects suffered by non-minority populations and/or non-low-income populations, as stipulated by the USDOT Final Order on Environmental Justice. The analysis evaluated minority, low-income, and other populations living in the study area, defined as one-half mile from the proposed project alignment. Other populations refer principally to social characteristics of the general population which may result in transit dependency. These characteristics include age, disability, Limited English Proficiency (LEP), and households without vehicles. The analysis was conducted pursuant to the guidelines established under the NEPA, and as outlined in the USDOT Final Order on Environmental Justice, FTA Circular 49 CFR 21.5, and in consultation with the Federal Transit Administration’s Office of Civil Rights.

In addition to Section 3.8, several other chapters of the FEIS detail the public process used to select the Preferred Alternative. Chapter 2 of the FEIS discusses the alternatives considered during the planning process, and the selection of the Preferred Alternative. Chapter 11 of the FEIS discusses the extensive outreach activities conducted as a part of the EIS processes to engage residents and local businesses, listen to their concerns, and provide input on the proposed alignment and alternatives, station locations, environmental issues, future development implications, project planning process, and the selection of the Preferred Alternative. Chapter 11 also discusses the CAC, its membership, and how it was used to guide project development. Printed materials for the public were translated into multiple languages to facilitate communication with immigrant communities. This input from public participation resulted in concurrent planning processes by the City of St. Paul for the development of the Central Corridor Development Strategy, which addresses many of the issues and concerns raised by adjacent neighborhoods (see Sections 3.1 and 3.2 and Chapter 5).

In response to concerns regarding gentrification issues as the result of property tax increases, the cities of Minneapolis and St. Paul are acutely aware of the influence market forces have on property values. Both cities have engaged in concurrent planning processes to establish land planning policies in an effort to stabilize market forces around stations areas while also encouraging development consistent with their respective comprehensive plans and policies. Additionally, Metropolitan Council has provided funding, in cooperation with Minnesota Housing and the Family Housing Fund, to assist with the development of affordable housing near the Preferred Alternative. While Executive Order 12898 and the USDOT Final Order on Environmental Justice do not identify improved property value as an environmental justice issue, the FEIS discusses the issue of “gentrification” in FEIS Section 3.2 “Neighborhoods, Community Services and Cohesion.” No displacements or acquisitions will occur in the identified environmental justice communities. Construction of the Preferred Alternative will result in several adverse impacts as documented in the FEIS. Every effort has been taken to
minimize adverse impacts of the Preferred Alternative to all communities living in proximity to the proposed alignment while maintaining the positive benefits this project would deliver. The Preferred Alternative will provide increased mobility to both residents and businesses within the Central Corridor and is expected to support future growth. New transportation capacity is anticipated to help create competitive advantages for businesses located in the corridor. The FEIS details the adverse impacts of the project and the mitigation measures the Metropolitan Council and project partners are committed to in order to address these impacts.

Section: 3.8 - Station Placement Concerns

Issue Summary A-023. Station Placement (4)

Comments:
(CCLRP0978) A-32
The Alliance for Metropolitan Stability calls on the Metropolitan Council to acknowledge and resolve the disparities in the Central Corridor LRT Line by including three stations at Hamline, Victoria, and Western.

(CCLRP1016) A-33
The communities on the eastern edge of this route need the station stops on Western, Victoria, and Hamline, with first preference to Western and Victoria.

(CCLRP1006) A-34
I would just like to say that I really believe that Western, Victoria and Hamlin should be included in the corridor. And I understand that they're looking at the idea of having something set up so that after, if and when there's money available, that we could put that in there, but my concern is the fact that in Western, and Victoria in particular, but also on Hamlin, those are communities that are very low income and really need that access. It would be, I think, money well spent and I think something we should really be considering putting the stops on those areas.

(CCLRP0996) A-35
Additional Stations - To ensure that the project equitably serves all neighborhoods along the corridor, we support adding stations at Western, Victoria, and Hamline. The proposed station spacing of one mile coupled with a reduction in service of route 16 could adversely impact low-income communities along the corridor that depend on public transit. In December of 2007, the District Councils Collaborative of Saint Paul and Minneapolis found that adding these stations would:
1. Be more consistent with station-spacing practices in other municipalities
2. Be more consistent with the corridor's character as a local corridor as opposed to a commuter corridor
3. Tap high ridership potential in the corridor given socioeconomic and geographic characteristics
4. Provide transportation service equity
5. Create more opportunities for future economic development
6. Strengthen the goals and objectives of the Central Corridor LRT Project.

**Response A-023.** The Preferred Alternative includes the construction of the underlying infrastructure necessary for future infill stations at Hamline Avenue, Western Avenue, and Victoria Street (described in SDEIS Section 3.8.4.2)., This allows these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. An enhanced discussion of transit-dependent populations and impacts to environmental justice communities is included in the Chapter 5 of this FEIS.

**Issue Summary A-024. Station Placement (1)**

**Comments:**
(CCLRP0978) A-36
The SDEIS should provide a clear explanation of what factors...justify which stations are retained for detailed analysis or dropped from further consideration.""6 A clear explanation of these factors has not been articulated in the Central Corridor LRT project SDEIS.

**Response A-024.** Alignment alternatives and station locations were chosen based on several factors, including cost effectiveness, mobility and accessibility, and community and environmental benefits. The SDEIS examined the social, economic, and environmental impacts of constructing three additional stations at Hamline Avenue, Victoria Street, and Western Avenue in the City of St. Paul. Analysis of the impacts to ridership on the Central Corridor LRT were conducted as part of the analysis. The analysis determined that the addition of these stations would not result in ridership gains, but rather a loss of overall ridership due mostly to the increase in overall travel time. This analysis report is provided in Appendix J of the FEIS. The Preferred Alternative includes underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT.

**Issue Summary A-025. Recommends three additional stations at Western, Victoria, and Hamline (2)**

**Comments:**
(CCLRP0952) A-37
• The City recommends the inclusion of the three infill stations as part of the initial construction of the Central Corridor LRT project. Further, if fewer than all three are funded as part of the initial construction, the City should have a central role in choosing priorities. Finally, the City will press for construction of any remaining of the three stations as quickly after the initial completion of the project. The City recommends the inclusion of the three infill stations as part of the initial construction of the Central Corridor LRT project. Further, if fewer than all three are funded as part of the initial construction, the City should have a central role in choosing priorities.
TLC supports the inclusion of LRT station at Western, Victoria, and Hamline with agreement from the city and communities to increase development density at these and other station locations.

**Response A-025.** The SDEIS examined the social, economic, and environmental impacts of constructing three additional stations at Hamline Avenue, Victoria Street, and Western Avenue in the City of St. Paul. Analysis of the impacts to ridership on the Central Corridor LRT were conducted as part of the analysis. The analysis determined that the addition of these stations would not result in ridership gains, but rather a loss of overall ridership due mostly to the increase in overall travel time. This analysis report is provided in Appendix J of the FEIS. The Preferred Alternative includes underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. The Metropolitan Council has committed to constructing these stations when funding becomes available.

**Issue Summary A-028. Impact and benefit to community near stations (1)**

**Comments:**
(CCLRP0983) A-42
In essence, the station has turned its back on the residential community surrounding it. This is an especially sensitive issue for the redevelopment of Rice Street north of University Avenue, which would benefit from association with an LRT station.

**Response A-028.** The Rice Street Station was shifted east of Rice Street to reduce impacts on traffic operations and property. Station planning activities will be undertaken to ensure the station is well integrated into the surrounding community. See Chapter 3 of the FEIS for further details.

**Issue Summary Ej-002. Concerns that stations are spaced too far apart, which will negatively impact environmental justice communities (6)**

**Comments:**
(CCLRP0944) Ej-02
On the first one regarding the need to include three additional stations, we want to just reiterate our call for that. It's a very, very important social and economic equity issue. It's very clear that the people that are living and working around Hamline, Victoria and Western are among the highest transit-dependent population in the corridor and in the entire metro area.

(CCLRP0947) Ej-04
The basic outcome is that the so-called infill stations, I believe, should not be considered infill. They should be considered critical to the project in order to maintain transit services the people in these neighbors have come to expect. I fear that we're going to make the problem worse in the sense of our plan to diminish our parallel bus service along that route. That makes little sense to me adding these two things together to say that we are indeed
improving transit services when it appears that we are not.

(CCLRP0968) Ej-07
Building the 3 more stops for the LRT is a matter of social and racial justice. The people who live there say they need these 3 stops for access to employment, education, and other resources that are taken for granted by those who have transportation. When looked at through the lens of social and racial justice, it is obvious that these stops be a priority not the last on the list in case there is left over money.

(CCLRP1015) Ej-10
With no stations at Western, Victoria, and Hamline, reduced number 16 bus service, and no special mitigation measures, disproportionately high impacts on residents and businesses between Snelling and Rice would not be avoided, minimized, or mitigated, and receipt of benefits by minority and low-income populations would be reduced and significantly delayed. We respectfully ask that the SDEIS address environmental justice in greater detail and give full consideration to arrange mitigation measures, including build-out of all three stations.

(CCLRP1013) Ej-11
Another issue I have is the spacing of stops on University Avenue. By having the light rail stop a mile apart in this area and reducing the bus service, the access to public transit is being limited in an area where it's most needed because there are high concentrations of transit-dependent people in and along the corridor in that area. So the possibility of additional stops needs to be considered a necessity in order for the light rail to really to be in (inaudible) public transit on University Avenue and (inaudible) to the people in the community.

(CCLRP0980) Ej-37
Consideration is not given to the following disproportionate impacts or inequitable distribution of benefits:
• Access to LRT stations is unequally distributed. Stations in our community are spaced at one-mile intervals, while they are spaced at half-mile or quarter mile intervals along other parts of the corridor. While 41 percent of residents within one quarter mile of current stations are people of color, 82 percent of residents within one quarter mile of the omitted stations at the Western, Victoria, and Hamline intersections are people of color.

Response Ej-002. During the comment period for the SDEIS, comments on environmental justice continued to be focused on transit service equity and station spacing, along with concerns regarding the recognition of environmental justice communities in the corridor. Comments regarding transit service equity were associated with the reduction in service frequency of the Route 16 bus. Additional comments expressed concern over station spacing in the Midway East planning segment and the construction of the three future infill stations. The refined Environmental Justice analysis did determine that three Census blocks in the Midway East planning segment, near the proposed Western Avenue Station, would experience a decrease in transit service with construction and operation of the Preferred Alternative. While the analysis determined that the majority of corridor residents would see significant increases in transit service, the reduction in service to these three Census blocks is

Response Ej-002. During the comment period for the SDEIS, comments on environmental justice continued to be focused on transit service equity and station spacing, along with concerns regarding the recognition of environmental justice communities in the corridor. Comments regarding transit service equity were associated with the reduction in service frequency of the Route 16 bus. Additional comments expressed concern over station spacing in the Midway East planning segment and the construction of the three future infill stations. The refined Environmental Justice analysis did determine that three Census blocks in the Midway East planning segment, near the proposed Western Avenue Station, would experience a decrease in transit service with construction and operation of the Preferred Alternative. While the analysis determined that the majority of corridor residents would see significant increases in transit service, the reduction in service to these three Census blocks is
considered a disproportionate impact for which the project benefits do not offset the impacts. In response, the Metropolitan Council will prepare a targeted transit service plan for the environmental justice communities identified as part of the Environmental Justice analysis. This service plan will be based on regional transit service standards and accepted quantitative methods typically used by Metro Transit but will also provide for community input into the process and measures of need as expressed by and as tailored for this transit-dependent community. Please see Section 3.8.

**Issue Summary Ej-003.** Concerned that station locations are not fair to environmental justice communities (3)

**Comments:**
(CCLRP0970) Ej-05
One thing we are watching is as these mountains of value get created, that the people who are there don't go tumbling off the sides and end up in the valleys. It would be a disservice to the neighborhoods for the locals to get displaced and this new valuable land to be colonized by outsiders. That's one way to look at gentrification. The other thing we wonder is, if each station stop is a golden mountain of land value, why do the people between Snelling and Rice get only one mountain per mile? Where are (the golden mountains of land value for the people who live around Western and Victoria and Hamline? Why is it that these people, a lot of whom are Asian, African, and American, get the dark sunless valley instead of the golden mountaintop?

(CCLRP1021) Ej-09
if each station stop is a golden mountain of land value, why do the people between Snelling and Rice get one mountain per mile? Where are the golden mountains of land value for the people who live around Western and Victoria and Hamline? And why is it that these people, a lot of whom are Asian, African-American, or African, get a dark valley instead of a golden mountain?

(CCLRP0983) Ej-33
LRT stations are not uniformly spaced throughout the Central Corridor. In fact, they are spaced twice as far apart (one mile) in Environmental Justice neighborhoods on the eastern end of University Avenue as they are elsewhere in the corridor. Significant portions of these Environmental Justice neighborhoods will not realize the above benefits because they are outside the 1/4-mile radius; until the stations are built, they would bear a disproportionate delay in receiving the benefits of this project. The FEIS must address this obvious disparity.

**Response Ej-003.** Concern over station spacing in the Midway East planning segment was an consistent theme heard during the comment period for the SDEIS. The refined Environmental Justice analysis did determine that three Census blocks in the Midway East planning segment, near the proposed Western Avenue Station, would experience a decrease in transit service with construction and operation of the Preferred Alternative. While the analysis determined that the majority of corridor residents would see significant increases in transit service, the reduction in service to these three Census blocks is considered a disproportionate impact for which the project benefits do not offset the impacts. In response,
the Metropolitan Council will prepare a targeted transit service plan for the environmental justice communities identified as part of the Environmental Justice analysis. Please see Section 3.8 for additional details.

**Issue Summary Ej-004. Concerned that station locations are not fair to environmental justice communities (1)**

**Comments:**
(CCLRP0955) Ej-06
The communities along the planned route along University Avenue in St. Paul are disadvantaged communities and disproportionately dependent on transit. Transit investment should improve, not diminish their options and quality of service. We have a problem ultimately stemming from the division to place stations one mile apart and not service on the #16 bus.
A. Stations are too far apart by standards of other cities.
B. The so called 'infill' stations should be top priority.
C. Rather than mitigating that deficiency we make it worse by cutting parallel bus service.

**Response Ej-004.** Comment noted. To address community access and mobility issues in the Midway East Segment and to respond to community concerns regarding station spacing, the Metropolitan Council evaluated future infill stations at Hamline Avenue, Western Avenue, and Victoria Street. This analysis is discussed in SDEIS Section 3.8.4.2. The Preferred Alternative includes underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. While the frequency of scheduled service for the Route 16 would be reduced, the introduction of LRT service running at 7.5 minutes during the peak hour periods and the additions of re-routed bus routes and new circular bus routes (Route 60 and Route 83) help to improve end-to-end run times along the corridor. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in the FEIS.

**Issue Summary Ej-006. Concerns that station placement favors non-minority communities (4)**

**Comments:**
(CCLRP0978) Ej-13
The SDEIS claims that "the analysis determined that no impacts associated with the proposed changes to the LPA would be disproportionately borne by minority or low income communities" despite the omission of stations at Hamline, Victoria and Western located in the Midway East Segment of the Central Corridor LRT.1 We believe this is incorrect. Without the addition of these three stations, the densely populated, minority, low-income, transit-dependent communities in the Midway East Segment of the Central Corridor LRT will experience a disproportionately limited access to transit.

(CCLRP1001) Ej-16
Not including stations for the communities around Western, Victoria and Hamline Avenues
is in contradiction to the "fundamental environmental justice principles" listed on the Environmental Justice web site of the U.S. Department of Justice, one of which states, "To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low income populations".

(CCLRP0971) Ej-18
I believe that the SDEIS is flawed because it is based on a false premise. The authors assumed that building the LRT line on University Avenue will not result in a disparate degree of adverse impacts for non-white, minority communities. This is not true, as the majority of residents living in the residential areas adjacent to University Avenue are not white. The construction disruptions, lack of nearby stations, and the severe reduction bus service frequency along University Avenue will have a profound and disproportionate negative impact on the neighborhoods with the highest minority

(CCLRP0983) Ej-31
a. SDEIS thematic maps show concentrations of minority or low-income populations in the Midway East segment of the corridor where the proposed stations would be located. This information concurs with other maps, research, and data submitted by the DCC to be part of the Public Record. Recent analysis of populations within a quarter mile of stations included in the project shows that, on average, approximately 40 percent are minority. Populations within a quarter mile of the stations excluded from the project are, on average, approximately 80 percent minority. This simple comparison demonstrates that environmental justice populations are not distributed uniformly throughout the corridor and, 40 percent minority populations around stations that are included in the project would receive substantial benefits, while the 80 percent minority populations around Western, Victoria, and Hamline would suffer adverse impacts due to limited LRT access.

Response Ej-006. The Metropolitan Council evaluated future infill stations at Hamline Avenue, Western Avenue, and Victoria Street to address community access and mobility issues in the Midway East Segment and to respond to community concerns regarding station spacing,. This analysis analyzed including these stations as part of the current project. The analysis is discussed in SDEIS Section 3.8.4.2. The Preferred Alternative includes underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in the FEIS.

Issue Summary Ej-007. Concerns that stations do not benefit environmental justice communities (1)

Comments:
(CCLRP0965) Ej-20
3. It is interesting that the only place there are stations one mile apart are in the lower and middle-income areas, which are the most diverse in jobs, ethnicity, and language. This is not consistent with "Met Council's objectives to preserve affordable housing" and will drive out these residents in favor of market rate or upscale housing.
Response Ej-007. The Preferred Alternative is expected to have positive effects on the commercial and residential areas along the Central Corridor. It is anticipated that the Preferred Alternative will contribute economic benefits by encouraging and supporting higher-density residential and commercial land uses around transit stations, including those in environmental justice neighborhoods consistent with local planning efforts. Increased mobility to both residents and business patrons within the Central Corridor is expected to support existing businesses and allow for their future growth. New transportation facilities could also create competitive advantages for businesses located in the corridor. Additionally, the Metropolitan Council evaluated future infill stations at Hamline Avenue, Western Avenue, and Victoria Street to address community access and mobility issues in the Midway East Segment and to respond to community concerns regarding station spacing. This analysis is discussed in SDEIS Section 3.8.4.2. The Preferred Alternative includes underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT.

Issue Summary Np-007. Concerns including impacts to business not close to stations (1)

Comments:
(CCLR0971) Np-11
LRT will bring disinvestment to the areas adjacent to University Avenue that are not located within a block of a station due to the failure of once-successful businesses when they lose their parking. Even near stations, the housing that is proposed will not serve families with children because all of it is 2 bedroom or less, and the units do not come with parking places, limiting the kind of person who would choose to live there.

Response Np-007. The Central Corridor Project Office surveyed businesses and conducted an analysis of on-street parking impacts. An inventory of University Avenue parking supply and impacts is summarized in Section 6.3 of the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or underutilized existing parking lots. Regarding housing, since the publication of the AA/DEIS, the City of St. Paul has begun to establish Transit Opportunity Zone overlay districts (TOZ), which, generally, promote and facilitate desired change or improvement through redevelopment and rehabilitation activities. Additionally, increased access brought by transit improvements may act as a catalyst for new investment. St. Paul adopted the Central Corridor Development Strategy (October 2007). The strategy contains an Inclusive Housing strategy that is intended to mitigate the potential displacement of low-income individuals and families from the corridor as property values rise and home ownership assistance. These are discussed in Chapter 3 of the FEIS.
Section: 3.8 - Concerns about Gentrification

Issue Summary Np-003. Concerns in regard to gentrification (1)

Comments:
(CCLRP1017) Np-09
Where Rondo was erased by I-94 and the community which is now the central corridor is the reflection of what Rondo once was and, yet again, we're looking at the same sort of potential for businesses and the gentrification to, in effect, impact what that community looks like.

Response Np-003. The Preferred Alternative is expected to have positive effects on the commercial and residential areas along the Central Corridor. It is anticipated that the Preferred Alternative will contribute economic benefits by encouraging and supporting higher-density residential and commercial land uses around transit stations. Increased mobility to both residents and business patrons within the Central Corridor is expected to support existing businesses and allow for their future growth. New transportation facilities could also create competitive advantages for businesses located in the corridor. Further, the minimization of the effects of natural market forces in vulnerable neighborhoods is a goal of such plans as the Central Corridor Development Strategy (2007), wherein St. Paul has created a set of guidelines for the development of the Central Corridor LRT and surrounding areas. It also includes strategies for inclusive housing and home ownership assistance. See Chapter 5 for anticipated economic effects and Section 3.1 for a discussion of the Central Corridor Development Strategy.

Issue Summary Np-005. Concerns in regard to gentrification (1)

Comments:
(CCLRP1013) Np-04
One of the most serious problems I can see happening with the construction of a light rail line in the central corridor is the impact of gentrification in both the residential and commercial areas. I know this certainly isn't an issue that's going to be avoided or easily fixed. It's something that really needs to be considered seriously and thoroughly investigated if the project intends to fulfill its objective of sustaining and preserving the neighborhoods of the corridor.

Response Np-005. FEIS Section 3.2 provides a detailed discussion of community cohesion issues and gentrification issues associated with the construction of the Central Corridor LRT project. Further, the minimization of the effects of natural market forces in vulnerable neighborhoods is a goal of Minneapolis and St. Paul, and both cities have adopted development and design guidelines as part of city and neighborhood comprehensive plans and zoning policies to both guide development in the corridor and preserve adjacent neighborhood characteristics and enhance community cohesion.
Issue Summary Np-010. Concern about gentrification and disproportionate impacts (1)

Comments:
(CCLRP0965) Np-12
2. "The enhancement of the potential for new higher density residential properties on University Ave" ...which is "considered especially attractive for new higher density residential uses on the existing low density residential properties" (quotes are right out of the SDEIS) essentially says to the current residents, who have been riders of the #16 bus for years and which is already the most used bus in the metro area are not valued. Equally it gives rise that the small homes and businesses are not valued by the Met Council and that there is a social gentrification plan rather than a transit plan. Clearly this is a direct and disproportionate impact of the LRT on the East part of University Avenue.

Response Np-010. Increased access brought by transit improvements may act as a catalyst for new investment. St. Paul adopted the Central Corridor Development Strategy (October 2007). The strategy contains an Inclusive Housing strategy that is intended to mitigate the potential displacement of low-income individuals and families from the corridor as property values rise and home ownership assistance. These are discussed in Chapter 3 of the FEIS.

Issue Summary Np-012. Concern about gentrification and disproportionate impacts (1)

Comments:
(CCLRP0965) Np-05
And if your document still contends that there is no disproportionate impact, the gentrification resulting from the future development previously acknowledged in your document and its implications does not send you a strong reality check of what it does to the small and minority owned businesses and residences, then you are not hearing the people speaking loud and clear.

Response Np-012. Transportation equity and community cohesion issues are crucial aspects of the Central Corridor LRT project and key considerations of the Metropolitan Council. The methods of analysis used for the environmental justice analysis and determination that no disproportionate impacts as a result of the project's development contained in the SDEIS were based on approved federal reporting requirements and standards. Following publication of the SDEIS and from the public comments received, the Metropolitan Council and the Federal Transit Administration have revisited these reporting requirements, and an enhanced discussion of impacts to environmental justice communities is included in the FEIS.

Section: 4.2 - Water Resources

Issue Summary Wq-001. Comments on groundwater issues (1)

Comments:
(CCLRP0952) Wq-01
In the section on Groundwater Resources (4.1, Table 4-1, and text on page 4-14) the SDEIS lists comments made by the Environmental Protection Agency (EPA) regarding potential
short-term impacts on groundwater where dewatering may be required during construction. Potential mitigation actions include limiting the amount and duration of dewatering, precautions to limit spills of petroleum or hazardous substances and development of a Stormwater Pollution Prevention Plan and spill prevention plan (p 4-15).

Response Wq-001. Comment noted.

Issue Summary Wq-002. Requirements for any outfall/stormwater structures or involve work in the river or adjacent wetlands (1)

Comments:
(CCLRP0973) Wq-02
To address future water quality issues, if the project would involve the construction or reconstruction of outfall structures and storm water management structures that would involve work in the river or adjacent wetlands our office should be contacted. Modification work to these types of structures is typically authorized by existing COE General Permits.

Response Wq-002. Comment noted. The project does not currently require new outfalls for stormwater or work within waters or wetlands. Construction activities for the Washington Avenue bridge will be coordinated with the Corps of Engineers (COE). Construction is not expected to require a COE permit because construction would be conducted using a barge and no construction would occur below normal water level.

Issue Summary Wq-003. Report corrections needed (3)

Comments:
(CCLRP0984) Wq-03
Section 4.2 Water Resources, includes the following statement: "the net increase in impervious surface and surface water runoff is expected to be negligible as compared to existing conditions. No long-term effects to surface water runoff are anticipated...." The notion that there will be no long-term effects to water resources because of negligible increases in impervious surfaces is incorrect. The current impervious surfaces are contributing to stormwater pollution to the Mississippi River and therefore are having a long-term affect on water resources. The reconstruction and "negligible increase" of impervious surfaces will therefore continue this long-term affect on water resources. We would request to amend section 4.2 to include reference to long-term affects to water resources that will be mitigated through permanent, post construction stormwater BMPs.

(CCLRP0984) Wq-04
The Capitol Region Watershed District adopted Rules in September 2006 and as such the Central Corridor Project will be required to obtain a permit from the CRWD. These rules, regardless of which alternative is selected, will require the project to incorporate both short-term construction stormwater BMPs and permanent, post construction volume reduction and water quality treatment BMPs.
Water Resources - Although it is correct that "no wetlands or public waters are located within the Central Corridor LRT Study Area", the entire study area within Minneapolis is served by a storm drain system that DOES drain to a public water, namely the Mississippi River and Bridal Veil Creek which is currently conveyed in a pipe system.

4.2.1 Legal and Regulatory Context: The way, in which "City of Minneapolis" is indented, it implies the Minneapolis is a member or subset of the Capitol Region Watershed District. Minneapolis is to be listed as a separate "bulleted" agency. (For the record, the portion of Minneapolis in which the Study Area is located is within the Mississippi Watershed Management Organization [MWMO], however it would not be accurate to indent Minneapolis under the MWMO either. It needs to be shown as a separate "bulleted" agency.)

4.2.1.3 Minnesota Pollution Control Agency: Within the sentence, "The MPCA and City of Minneapolis review draft NPDES permits", strike out "City of Minneapolis". The City does require a copy of the project's NPDES Construction Permit Application including the Stormwater Pollution Prevention Plan (SWPPP) as part of its Erosion & Sediment Control Permit process, however the City is not an official reviewer for the JWDES Permit evaluating that there is compliance to the more stringent of the requirements between the MPCA permit and the Minneapolis permit.

4.2.1.5 Cities of Minneapolis and St. Paul: Regarding the first paragraph: For Minneapolis, the first and third sentences of the first paragraph are not accurate. (The second sentence pertaining to FEMA and floodplains is accurate for Minneapolis.) For Minneapolis, the following replacement language is an acceptable substitution for the first and third sentences: Minneapolis regulates water quality through its building plan reviews, its Erosion & Sediment Control Ordinance, and its Stormwater Management Ordinance. An Erosion & Sediment Control Plan is required for projects that disturb in excess of either five thousand (5,000) square feet or five hundred (500) cubic yards of earth moved. A Stormwater Management Plan is required for projects on sites that exceed one acre. It is sometimes the case that the Stormwater Pollution Prevention Plan (SWPPP) prepared for the MPCA for the NPDES General Construction Permit (as described in 4.2.1.3) provides the information applicable to both of the Minneapolis plans described in this section, however there may be additional requirements by the City.

4.2.1.6 Mississippi Watershed Management Organization and Capitol Region Watershed District: The third sentence is awkward at best, and possibly incorrect, depending on the intended meaning of the statement, which is unclear: "The MWMO and CRWD are direct tributaries to the Mississippi River." The MWMO and CRWD are agencies, not bodies of water. Some but not all of the areas within the jurisdictions of the MWMO and CRWD are directly tributary to the Mississippi River. The fourth and fifth sentences are untrue within the City of Minneapolis. The City of Minneapolis, and not the MWMO, carries out these tasks. These two sentences should be moved to section 4.2.1.5 for at least portion of the project within Minneapolis. (For clarity, it may be preferable to divide "City of Minneapolis" and City of St. Paul" into two separate sections.)
4.2.3 Existing Conditions: The following language, shown above in reference to section 4.2, could be added to the end of section 4.2.3: Although it is correct that "no wetlands or public waters are located within the Central Corridor LRT Study Area", the entire study area within Minneapolis is served by a storm drain system that DOES drain to a public water, namely the Mississippi River and Bridal Veil Creek. Minneapolis and other older cities developed before there were regulations regarding storm water quality. Our only opportunities to improve existing conditions are during REDEVELOPMENT or by RETROFITTING. The quality of lakes and rivers is especially important to the State of Minnesota and the City of Minneapolis. Any time there is a public project, or there is jurisdiction over a private project, the agencies involved should be looking for opportunities to make improvements for the betterment of our water resources.

4.2.4.2 Key Project Elements: Regarding the statement, "However, the proposed construction activities will take place, for the most part, within existing impervious surfaces." With the qualifier, "for the most part", this is undoubtedly a true statement. However, there are several areas within Minneapolis that are not currently impervious that will be impacted. There are opportunities in these areas, to minimize NEW impervious surfaces. There are also opportunities throughout the corridor to remove EXISTING impervious surfaces and replace with pervious materials. Regarding the statement, "No long-term effects to surface water runoff are anticipated;" For the purposes of the EIS, 'long-term effects' is generally understood to mean 'long-term ADVERSE effects'. It might be noted, however, that in this project there are opportunities for long-term REDUCTIONS and TREATMENT of surface water runoff.

4.2.5 Short-Term Construction Effects: Regarding the statement, "All storm drainage systems located within the Study Area are designed to accommodate runoff from the existing developed conditions, the following should be added: " ..., however in Minneapolis the system is at or near capacity and thus rate controls may be required." Regarding the following sentence, The City of Minneapolis should be added, as follows: "The City of St. Paul and the City of Minneapolis may require upgrades to the existing storm sewer system to provide additional treatment for storm water runoff within the proposed construction limits. It is anticipated ..."

4.2.6 Mitigation: The third sentence is poorly constructed

Response Wq-003. Section 4.2 of the FEIS was updated to reflect these comments.

Issue Summary Wq-004. Concerns in regard to conflicts with storm drainage pipes (1)

Comments:
(CCLRP0969) Wq-05
U of M Alignment - The University Transitway will need to be moved to the north to accommodate the relocation of the storm drainage pipes. Clarification on the safety of running LRT on top of a storm drainage pipe needs to be provided.
Response Wq-004. Utilities such as storm sewer will be relocated or reconstructed if they are underneath and parallel to the proposed Central Corridor LRT alignment. This utility work would likely be completed before construction of the LRT alignment would begin.

Section: 4.6 - Air Quality

Issue Summary Aq-001. Reducing carbon emissions should be a goal (1)

Comments:
(CCLRP0966) Aq-1
Reducing carbon emissions should be a goal

Response Aq-001. The FEIS analyzed the carbon dioxide equivalent (CO2E) emissions for the Preferred Alternative (see Chapter 9). The analysis shows that the Preferred Alternative will have less CO2E emissions than the No-Build, not accounting for any GHG/CO2E emissions which would be produced to provide the electricity required to power the LRT.

Issue Summary Aq-002. Air quality hot spot analysis for selected intersections needs to be re-evaluated (1)

Comments:
(CCLRP0964) Aq-2
given our comments regarding traffic volumes and level of service, the air quality hot spot analysis for selected intersections may need to be re-evaluated.

Response Aq-002. The air quality analysis, which used updated traffic data, is discussed in Section 4.5 of the FEIS.

Issue Summary Aq-003. Identify five intersections that are proposed for further air quality analysis (1)

Comments:
(CCLRP0964) Aq-3
Table 4-4: Should note/identify the five intersections that are proposed for further air quality analysis within their appropriate planning segment. It appears that there are no impacts and there will be no further analysis.

Response Aq-003. The FEIS identifies the five intersections that were included as part of the hotspot analysis. The air quality analysis is located in Section 4.5 of the FEIS. The traffic analysis is located in Chapter 6.
Issue Summary Aq-004. **Report clarifications/corrections needed in regard to regional emissions and air quality analysis** (1)

Comments:
(CCLRP0964) Aq-4
Section 4.5.4.2, first paragraph: The statement regarding regional emissions analysis is misleading; if conformity requirements are met; they're met. Third paragraph: it would be helpful to include a summary table of the AA/DEIS detailed air quality analysis results for the intersections analyzed.

Response Aq-004. Regarding the first paragraph of 4.5.4.2, the project is included in the current air quality conformity determination, and therefore, no regional emissions analysis is required. Regarding the third paragraph of 4.5.4.2, a summary table of the intersections identified for the hotspot air quality analysis is included in the FEIS.

Issue Summary Aq-005. **How will "excessive emissions" be determined?** (1)

Comments:
(CCLRP0964) Aq-5
Section 4.5.6 Mitigation: How will "excessive emissions" be determined?

Response Aq-005. If the hotspot analysis determines that AAQS are exceeded, mitigation will be proposed.

Issue Summary Aq-006. **Coordinate traffic mitigation analysis with the MnDOT Metropolitan District** (1)

Comments:
(CCLRP0964) Aq-6
Traffic mitigation analysis for the FEIS needs to be developed in coordination with the Mn/DOT Metropolitan District.

Response Aq-006. The Central Corridor Project office will coordinate with MnDOT regarding traffic mitigation. Traffic mitigation is discussed in Chapter 6 of the FEI

Issue Summary Aq-007. **Identify five intersections that are proposed for further air quality analysis** (1)

Comments:
(CCLRP0969) Aq-7
Table 4.4 4-31-32, The reader would also be better informed if the five worst-case intersections were identified and could somehow compare University area intersections with those five.

Response Aq-007. The FEIS identifies the five intersections that are included as part of the hotspot analysis. If these intersections comply with the AAQS, it can be assumed that all other intersections affected, including those in the University area, also comply.
Issue Summary Aq-008. Air quality analysis should be performed for more than just the five worst-case intersections (1)

Comments:
(CCLRP0974) Aq-8
4.5 Air Quality - The statement that the U of M at-grade alignment will have no greater air quality impacts than those anticipated with the AA/DEIS alignment including a tunnel because the intersections in the vicinity are not among the 5 worst-case intersections being analyzed on the corridor does not support that there is no impact with an at-grade alignment. Increases in traffic at intersections not on the corridor because of the closure of Washington Avenue will have impacts on air quality whether or not they are the "five worst-case". Define the effects beyond the "five case".

Response Aq-008. The U of M at-grade alignment could have greater air quality impacts than those which are currently experienced. However, if the five worst-case intersections are analyzed and shown to comply with AAQS, it can be assumed that all other intersections, including those in the University area, will also comply with the AAQS.

Section: 4.7 - Noise

Issue Summary Noi-001. Concerns that MPR's recording studios is not listed as a Category I land use, and concerns about noise and vibration impacts to MPR recording studios and concert halls (1)

Comments:
(CCLRP0994) Noi-36
However, in the description of Category I land uses, the SDEIS has excluded the following sentence: "Also included are recording studios and concert halls." Attached to this comment letter are page 4-47 from the SDEIS (Exhibit A) and the table from page 3-5 of the FTA's Transit Noise and Vibration Impact Assessment, May, 2006 (Exhibit B). Setting aside the disturbing implications of this omission, MPR's facility is obviously a Category I land use. It consists primarily of recording studios, including the Maud Moon Weyerhaeuser recording facility, which is directly adjacent to Cedar Street. Additionally, MPR's Fitzgerald Theater is a historic concert hall located less than one block away from the proposed Central Corridor route.

Response Noi-001. The FEIS will correctly identify which land use category recording studios belong in. The Metropolitan Council performed a Detailed Noise Assessment based on FTA (2006) methods for the FEIS. Refer to Section 4.6 of the FEIS for results of that Detailed Noise Assessment. Chapter 4.6 and appendix J discuss the existing noise levels on Cedar Street and the additional noise analysis performed at MPR and other Cedar Street locations.
All of the Cedar Street locations benefit from the operational mitigation measures that Metropolitan Council commits to implement for the Central Corridor LRT project. Noise from LRT audible warning devices had potential to impact some receptors if operated at the volume levels currently in use on the Hiawatha LRT. Through a series of activities, described in Chapter 4.6 and Appendix J, Metropolitan Council will enact administrative noise mitigation measures to reduce the number of potential noise impacts in this portion of the project area. Those measures include eliminating routine LRT horn use, possibly reducing the volume or duration of LRT bells, and potentially implementing receptor-based structural mitigation measures at MPR studios M and P.

The Metropolitan Council also performed a detailed Construction Noise and Vibration Assessment based on FTA (2006) methods. Results of the construction analysis showed the potential for noise and vibration induced interference at MPR’s recording studios. The Metropolitan Council has committed to mitigating noise and vibration due to construction activities at MPR and other locations. Construction activities will be coordinated with MPR to limit interference with studio activities.

**Issue Summary Noi-002. Report corrections/clarifications needed in regard to vibration**

(2)

**Comments:**
(CCLRP0969) Noi-49
Existing Conditions - Existing Conditions section needs to be updated to reflect the current information regarding vibration levels along the Central Corridor.

(CCLRP0969) Noi-51
Operational Vibration Mitigation - The Central Corridor Draft Supplemental Environmental Impact Statement Vibration Technical Memo is not in the SDEIS.

**Response Noi-002.** The Metropolitan Council performed a Detailed Vibration Assessment based on FTA (2006) methods for the FEIS. Analysis results are reported in Chapter 4.7 of the FEIS.

**Issue Summary Noi-003. Concerns in regard to noise and vibration impacts and mitigation**

(12)

**Comments:**
(CCLRP0979) Noi-37
The interior plaster walls and plaster ceiling and were constructed using the building techniques of the early twentieth century

Due to the age of the plaster keys, they are particularly vulnerable to damage from vibrations. Based on conversations with structural engineers, the cumulative effect of relatively weak vibration events (less than 90 dB) may be sufficient to critically damage the plaster keys resulting in significant damage to the Church and potential injury to parishioners and guests.
The majority of organ pipes and supporting components are housed in an elevated choir loft that is located on the far western end of the Church - the wall closest to the train. Of the 3,300 pipes used by the organ, 3,000 are flue pipes that create sounds similar to that of a flute or recorder. The others are primarily reed pipes that generate sounds similar to a clarinet or bassoon.

4 Both are extremely vulnerable to vibrations. According to Denis Blain, Casavant's technical director, pipe organs are particularly susceptible to vibrations and certain pipes can be rendered inoperable if particulate matter (e.g., dust, hair) enters certain pipes. Mr. Blain stated that the tuning mechanism for flue pipes is one element that can be adversely affected by vibrations. To tune a flue pipe, a "slide" mechanism to alter the length of the pipe, thereby changing its sound. The slide is held in position by friction between the slide and the pipe. According to Mr. Blain, in some cases, relative weak vibrations can overcome the friction forces holding the slide in place, causing the slide to slip, and resulting in the organ being out-of-tune.

5 Frequent vibrations can render the organ's flue pipes perpetually out-of-tune. Different from flue pipes, reed pipes can be rendered entirely inoperable if particulate matter falls into the pipe. A strand of hair is enough to prevent these pipes from operating. Vibrations even if beneath damage threshold will likely create increased levels of dust in the Church, thereby, increasing the risk that significant elements of the Church's organ will be rendered inoperable. In light of the organ's particularly susceptibilities to vibration, damage to the organ will likely occur at a significantly lower threshold. In fact, had Mr. Blain known that the Church was to be subject to recurring vibrations, he would have recommended a comb style tuning mechanism for the pipes that is not susceptible to vibration.

The vibrations generated by the Project certainly affect the beauty and utility of Church and its pipe organ. These effects support a determination that it is used under Section 4(f), and require a full examination of alternatives and mitigation measures before the Secretary of Transportation can approve the Project.

Project staff and consultants have omitted known Project generated noises in the consideration of potential impact to the Church, and have relied on FTA standards that are obviously different from actual Project conditions.

The methodology employed by Project staff and consultants to determine the impact of Project operations on the Church assumes the use of three-car trains and continuously welded track. Noticeably absent from these assumptions are the intense, frequent noises generated by brake squeal, wheel impact, and train signal devices. Due to the Church's proximity to the Tenth Street Station and the signalized intersection at Tenth and Cedar it will undoubtedly be frequently subjected to the intense noise from brake squeal and train signals. The frequency and intensity of these noises will undoubtedly affect the sound energy reference levels stated in the SDEIS.

Additionally, the Section 4(f) analysis cannot rely on FTA standards that are obviously different from actual Project conditions. The FTA standard assumes a distance from source to
receiver of fifty feet, whereas, under predicted project conditions the train will pass less than thirty feet from the front door of the Church. Moreover, under certain conditions, the train will brake, idle, and sound its bell/horn immediately in front of the Church.

In sum, Section 4(f) requires full consideration of the potential impacts of a transportation project on protected properties; satisfaction of this requirement necessitates an analysis of all the noises generated by the Project under conditions as will exist near such a protected property. Here, the SDEIS fails to satisfy Section 4(f) requirements.

(CCLRP0994) Noi-38
the preliminary determination of potential vibration impacts is likely understated because of the assumptions made about the future operation of trains on the Central Corridor. For example, it was assumed that all LRT vehicles will always have wheels in good condition, and that the track will be new, continuously welded rail that is always in good condition. (Page 4-60.) These assumptions are unrealistic. Additionally, no consideration was given to the vibration effects of grade changes, switches, or gaps, track joints and seams in the rail necessitated by signal controls.

(CCLRP0994) Noi-39
As you know, MPR believes the Project has the potential to result in significant impacts on its day-to-day operations. Specifically, the Project will produce noise and vibration, which have a high potential to affect such MPR operations as recording, live concerts and music sessions, and the use of sensitive broadcasting equipment. The Project also has the potential to create electromagnetic interference (EMI) and radio frequency interference (RFI) affecting MPR's operations. It is because of these concerns and others that MPR has urged the Metropolitan Council and Central Corridor Project Office to move the Central Corridor route off of Cedar Street.

(CCLRP0994) Noi-40
As detailed in Comment 3 below, the SDEIS purports to rely on Federal Transit Administration (FTA) guidelines for its noise analysis, but then fails to use the objective land use criteria set out in the guidelines. The omission raises serious questions about the efficacy of the SDEIS as to issues of vital concern to MPR.

(CCLRP0994) Noi-41
The SDEIS states that noise impacts were evaluated using the FTA General Noise Assessment procedures for Category 2 and Category 3 land uses. (Page 4-49.) In other words, no affected properties are being considered as Category I land uses, which are those most sensitive to noise. This conclusion is wrong, and more troubling is the fact that the conclusion appears to have been arrived at intentionally, through selective use of the FTA guidelines for assessing noise impacts.

(CCLRP0969) Noi-43
University of Minnesota Alignment - Information regarding vibration-sensitive buildings needs to be updated; specifically, Hasselmo Hall needs to be addressed as a sensitive site.
(CCLRP0969) Noi-45
Construction vibration will shut down research in the NMR facility in Hasselmo Hall. This impact needs to be mitigated. A possible solution is creating a temporary facility in a location far outside of the construction zone.

(CCLRP0969) Noi-46
Operational Vibration Mitigation - Research activities at the University must be protected-ambient vibration levels cannot be worse along than corridor than today's existing conditions.

(CCLRP0969) Noi-47
Future on-campus construction of the Science Classroom Building and research park in the East Gateway district could be effected by LRT vibration and should be identified as such.

(CCLRP0969) Noi-48
University of Minnesota - Kolthoff Hall and Molecular and Cellular Biology Building need to be added and defined as vibration-sensitive buildings on the campus.

(CCLRP0969) Noi-50
Noise: U of M Alignment - Potential noise impacts in areas receiving the redirected vehicular traffic from Washington Avenue are not addressed.

(CCLRP0969) Noi-53
Comparative Evaluation of the AA/DEIS LPA and Proposed Changes to AA/DEIS LPA - Environmental Effects - Noise and Vibration - Continue to work with University to identify sensitive areas and mitigation strategies, especially for construction period.

Response Noi-003. The Metropolitan Council performed a Detailed Noise Assessment and both General and Detailed Vibration Assessments based on FTA (2006) methods for the FEIS. Noise- and vibration-sensitive land use were identified, categorized, and assessed in accordance with FTA methods. Analysis results were used to determine the need for, selection and implementation of noise and vibration mitigation measures during construction and operation of the proposed Central Corridor LRT project.

For details concerning the analysis results and mitigation measures for operational and construction noise and vibration refer to sections 4.6 and 4.7 of the FEIS, respectively.

ATS Consulting, Los Angeles, CA., performed a Detailed Vibration Assessment in May of 2008 as well as supplemental analysis in October of 2008. The first Detailed Vibration Assessment was performed at U of M, KSTP, 1951 University, MPR, Central Presbyterian and St. Louis, King of France. The second supplemental analysis repeated work done at some of these locations.

At both of the historic churches on Cedar Street, vibration assessments measured vibration at various locations throughout both buildings and these included locations where vibration is of high concern such as stain glass windows, balconies near the organ, the organ cabinet itself, and below pews.
Detailed Vibration Assessments were performed at both churches during quiet times with no activity within the church, and also during times when the pipe organs were being played.

In all instances when the respective organs were being played, vibration levels were at their highest specifically due to the organs themselves. ATS concluded that the organs generate more vibration that the project will while in operation.

Additionally, the ATS analysis concluded that vibration generated by LRT operations will be well below the building damage screening threshold of 90Vdb- which is the strictest FTA vibration threshold meant to protect fragile historic buildings.

However, ATS did conclude that there is a potential for audible noise generated by vibrating room surfaces. This audible vibration noise can be mitigated by employing special track bedding which will bring the audible vibration noise below levels reserved for theaters and auditoriums.

Vibration analysis and mitigation is discussed within the EIS at “4.7 Vibration”.

**Issue Summary Noi-004. Concerns in regard to electromagnetic field and utilities impacts and mitigation (4)**

**Comments:**

(CCLRP0969) Noi-25
EMI: The CCPO also has provided the University with a preliminary analysis and conceptual design for a strategy to mitigate the impacts of EMI on the University's sensitive research equipment along Washington Avenue. While promising, the conceptual design does not include specific site conditions that will need to be addressed that could impact the effectiveness of the mitigation strategies. The extremely close proximity of the line to the University's laboratories remains an issue and further work during preliminary and final engineering is required in order to ensure the effectiveness of the mitigation strategy. The report concludes that the geomagnetic perturbations "should be within the 2 milligauss limit at 77 feet" (the approximate distance from the rail to one of the University's unshielded NMR magnets). The word "should" does not provide the University with the certainty it needs to support such mitigation, and could ultimately require relocation of these facilities.

(CCLRP0969) Noi-42
Long-Term EMF/EMI - The University could experience long-term effects on research activities from EMF/EMI if the mitigation strategies are not implemented effectively.

(CCLRP0969) Noi-44
Electromagnetic Fields - There are additional University research facilities that utilize and house EMF-sensitive equipment. EMF/EMI could affect the University's research function.
(CCLRP0969) Noi-52
Comparative Evaluation of the AA/DEIS LPA and Proposed Changes to AA/DEIS LPA - Environmental Effects - Electromagnetic Field and Utilities - Continue to work with University to identify sensitive areas and mitigation strategies, especially for construction period.

Response Noi-004. A detailed analysis of potential impacts from electromagnetic interference and mitigation are discussed in Section 4.9 of the FEIS.

Issue Summary Noi-005. Report corrections/clarifications needed (2)

Comments:
(CCLRP0969) Noi-30
Table 10-1 10-3 EMI should be added under ""Goal 2: Preserve and Enhance Communities and Support Healthier Environments"" where vibration is represented.

(CCLRP0969) Noi-54
4.9.6.2 4-88 Second paragraph belongs with the EMF section.

Response Noi-005. Comment noted.

Issue Summary Noi-006. Not in favor of selection of maintenance facility location (1)

Comments:
(CCLRP0992) Noi-05
We do not believe that the maintenance facility is the highest and best use for this parcel of land, given its proximity to the Mississippi riverfront, the Bruce Vento Nature Sanctuary and the Lowertown neighborhood's housing, artists community and other resources. We do believe an alternative location(s) ought to be considered for the best interest of the community.

Response Noi-006. The Preferred Alternative includes an operations and maintenance facility that reuses a portion of the Diamond Products site in downtown St. Paul, which avoids the significant issues of the previously considered site including being outside of the Mississippi National River and Recreation Area (MNRRA) and the Mississippi River Critical Area (MRCA) boundary. This proposal minimizes the footprint of Central Corridor LRT in areas closest to the Bruce Vento Nature Sanctuary and the surrounding areas and better serves the interest of the Lowertown community.
Issue Summary Noi-007. Need to determine impacts and mitigation for University's NMR magnets' sensitivities to specific frequencies (1)

Comments:
(CCLRP0969) Noi-27
The CCPO consultant is unsure of University's NMR magnets' sensitivities to specific frequencies and thus is unsure of the appropriate recommended mitigations. The CCPO consultant admitted that in certain cases, the proposed mitigation - floating slab construction -- could do more harm than good.

Response Noi-007. Comment noted. The Metropolitan Council performed a Detailed Vibration Assessment based on FTA (2006) methods. Analysis results were used to determine the need for, selection and implementation of vibration mitigation measures during construction and operation of the proposed Central Corridor LRT project. The methodology and results of the on site testing can be found in Section 4.7 and Appendix J.

Issue Summary Noi-008. Concerns in regard to noise and vibration impacts (1)

Comments:
(CCLRP0952) Noi-01
The City recommends that Preliminary Engineering include resilient fastners to mitigate noise, vibration, and electromagnetic interference potentially caused by light rail transit on Cedar Street past two historic properties (Central Presbyterian Church & Church of Saint Louis) and Minnesota Public Radio.

The City recommends that more analysis be done on the quality and timing of noise generated by the Vehicle and Maintenance Facility, particularly any noise 'spiking' with LRT vehicle operations and during nighttime hours.

The City recommends that Preliminary Engineering include resilient fastners to mitigate noise, vibration, and electromagnetic interference potentially caused by light rail transit on Cedar Street past two historic properties (Central Presbyterian Church & Church of Saint Louis) and Minnesota Public Radio

The section on Noise (4.6, and text on pp 4-53, 54, 56 and 57) states that no noise impacts as defined by the Federal Transit Administration will be generated by the Vehicle Maintenance and Storage Facility. Furthermore, it states that traffic noise dominates the acoustic environment in the area. However, much of the activity at this facility will take place at night when there is little traffic in the area. In addition, the quality of noise (e.g. "wheel squeal" and coupling) needs further analysis.

The City recommends that more analysis be done on the quality and timing of noise generated by the Vehicle and Maintenance Facility, particularly any noise 'spiking' with LRT vehicle operations and during nighttime hours.
Response Noi-008. Metropolitan Council performed a detailed noise and vibration analyses based on FTA (2006) guidance for the entire project corridor. Analysis results, as stated in sections 4.6 and 4.7 of the FEIS, were used to guide the selection and implementation of noise and vibration mitigation measures throughout the corridor including the Cedar Street corridor where two historic churches and MPR exist. Analysis results showed no noise and vibration impacts associated with the LRT Vehicle and Maintenance Facility. Although the FTA (2006) noise and vibration impact assessment manual (2006) addresses noise "spikes" or maximum noise levels (Lmax), the Lmax descriptor is not used as an impact threshold. Metropolitan Council recognizes that the proposed Central Corridor LRT project alignment is in close proximity to the churches and MPR. Metropolitan Council also recognizes that the existing acoustic environment is representative of the downtown district of a major urban city. This acoustic environment is often punctuated by short-term noise events such as brake screeches, horns on vehicles, emergency responder sirens, church bells, lawn mower use, general traffic noise, etc. As such, Metropolitan Council recognizes little merit in developing a crude estimate of LRT Lmax values. If the existing acoustic environment was not already punctuated by these short-term noise events, then an estimate of Lmax would add value to the analysis. Based on the 24-hour noise monitoring data collected in this portion of the project area, Metropolitan Council concludes that LRT-induced Lmax noise levels have limited potential to dramatically affect the ambient acoustic environment in this portion of the project area.

Issue Summary Noi-009. Detailed noise impact analysis is needed (1)

Comments:
(CCLRP0994) Noi-35
The methodology used for "determining" airborne noise impacts was more in the nature of quick calculations done on the back of an envelope than any kind of thoughtful, analytical process. Consequently, the best that can be said about the result is that they are rough estimates, not determinations.

The SDEIS methodology was to use estimates of Project noise levels and to compare them with impact thresholds for Category 2 and 3 land uses. As noted in the preceding comment, MPR is a Category 1 land use. Moreover, the SOE1S provides scant information as to where the estimates of Project noise come from and whether any consideration was given to specific LRT noises, such as train bells, train horns, track turns, and noise reflection in a downtown environment.

Response Noi-009. The scope of the SDEIS was a list of narrowly defined topics, and did not include a Detailed Noise Assessment of bells, horns, and all other LRT noises for the entire project corridor. However, Section 4.6 of the FEIS presents results of the Detailed Noise Assessment performed for the entire Central Corridor LRT project corridor.
results and on-site simulations on Cedar street were used to determine the need for, selection and implementation of noise mitigation measures during construction and operation of the proposed Central Corridor LRT project. Refer to Section 4.6 and Appendix J of the FEIS for further details.

**Issue Summary Noi-010. Concerns about noise and vibration impact to Central Presbyterian Church** (1)

**Comments:**
(CCLRP0986) Noi-22
We request the Met Council adopt the measures below to minimize the negative impact of light rail on Central Presbyterian Church: Reduce vibration damage by using high-resilience track fasteners. Monitor vibration impacts to Central's building during construction and operation. Minimize wheel squeal from train operations. Modify bell signals to not interfere with Central activities.

**Response Noi-010.** The Metropolitan Council performed a Detailed Noise and a Detailed Vibration Assessment based on FTA (2006) methods. The results of the analysis determined that noise and vibration mitigation measures would alleviate potential impacts at Central Presbyterian Church. Refer to Section 4.6, 4.7, and Appendix J of the FEIS for further details on the proposed noise and vibration mitigation measures at Central Presbyterian Church and other portions of the project area.

**Issue Summary Noi-011. Concerns about noise impacts to sensitive noise receivers** (5)

**Comments:**
(CCLRP1011) Noi-03
the train going 28 feet from the door of the church, the noise will not be mitigated by distance, and in the summertime, the church leaves the sanctuary open due -- because we don't have air conditioning.

(CCLRP1012) Noi-04
And also, environment protects us against noise, disruption. It doesn't have to be noise that exceeds certain decibel levels, but if you're going to hear those bells on University ding, ding, ding all night until two a.m., I don't know if the people are going to stand for it.

(CCLRP0992) Noi-06
Further, the maintenance facility would have potential negative effects on the Bruce Vento Nature Sanctuary, specifically visual and noise pollution.

(CCLRP0985) Noi-12
The continuous vibration, noise, EMF, and RFI interference could have an effect on sensitive sound and technology equipment, both at Minnesota Public Radio, at the St. Paul Conservatory of Music, and at McNally Smith College of Music.
TPSS would add significantly to background noise especially at night. Your response is that the noise level is already a certain level does not meet the higher standards of being a good neighbor.

Response Noi-011. The Metropolitan Council performed a Detailed Noise Assessment based on FTA (2006) methods. Analysis results were used to determine the need for, selection and implementation of noise mitigation measures.

Issue Summary Noi-012. Concerned that there is proper maintenance, monitoring, and review of noise mitigation

Comments:
(CCLRP0985) Noi-08
For several Items, particularly those related to noise and vibrations on Cedar Street, there needs to be ongoing maintenance, monitoring, and review of the proposed mitigations to ensure they are living up to their potential.

Response Noi-012. The Metropolitan Council performed a Detailed Noise Assessment based on FTA (2006) methods. Analysis results and additional noise testing, including a bell and horn simulation were used to determine the need for, selection and implementation of noise mitigation measures. Refer to Chapter 4.6 and appendix J for details regarding the proposed mitigation measures.

Metropolitan Council is committed to maintaining LRT systems, discontinuing the routine use of horns, will reduce bell SEL and has committed to other noise mitigation measures as discussed in Chapter 4.6

Issue Summary Noi-013. Concerns about noise around tight curves

Comments:
(CCLRP0985) Noi-10
The turn to the maintenance facility will require a 90° turn, which will generate a substantial and loud squeal every time a train passes through the area. That turn will be the sharpest at Broadway, where it seems most likely to produce the most detrimental sound. The sounds made by the turn at Broadway will also impact the greatest number of nearby residents.

(CCLRP0985) Noi-13
The noise produced on the turn is a concern, though the 45° turn should produce less noise than the 90° turn.

(CCLRP0985) Noi-14
Significant noise will be made at the 90° turn off of 4th Street to access the maintenance facility, which is likely especially true if the turn is at Broadway, where it will have to be the sharpest
In addition, the ATS consulting report on vibrations and noise impact could not answer the question of whether and to what extent we will experience what is called "wheel squeal" as the train travels on a track alignment that changes from the middle of Cedar to the eastern side of Cedar in the area immediately in front of our sanctuary.

I am concerned about the alignment on University Avenue on the north side of the Capitol Robert St for several reasons. In this segment there are a number of additional sharp turns, which create noise and I believe accelerate wear on the wheels.

Response Noi-013. The Metropolitan Council performed a Detailed Noise Assessment based on FTA (2006) methods. The noise assessment presented in Chapter 4 accounts for wheel squeal around tight curves. There are no impacts predicted to occur due to wheel squeal throughout the project corridor.

Issue Summary Noi-014. Concerns about noise at change in alignment at east side of Cedar Street (1)

Comments:
(CCLRP0985) Noi-11
There will be a change in track alignment to the East side of Cedar Street going south as the train leaves the station. Changes in alignment tend to bring wheel squeal which would impact many of the surrounding structures.

Response Noi-014. The Metropolitan Council performed a Detailed Noise Assessment based on FTA (2006) methods. Analysis results were used to determine the need for, selection and implementation of noise mitigation measures. The curve radii in this portion of Cedar Street are 1900' and 2100' for the two curves that make up that shift (on the municipal consent submittal plan set). These radii are greater than the minimum 500 m (1640') radius where curve squeal is not likely to occur, and much greater than the criteria the Metropolitan Council used where there is a high probability of curve squeal. Metropolitan Council's assessment of wheel squeal assumed the R/W ratio of 100, where the truck wheelbase W is 4.5', so any curve with a radius R less than 450' is indicated likely to produce wheel squeal.

Issue Summary Noi-015. Recommended noise mitigation measures (1)

Comments:
(CCLRP0986) Noi-21
We request a noise mitigation plan including these elements:
1. Reduce wheel squeal by using as gradual an angle as possible as the LRT line transitions from the middle of Cedar Street to the eastern side.
2. Change or clarify the Standard Operating Procedures for warning bells in the area of track within hearing of our sanctuary,
3. Include measures to isolate our sanctuary from this regular and disruptive noise.
Response Noi-015. The Metropolitan Council performed a existing noise level measurements and a Detailed Noise Assessment based on FTA (2006) methods for the Bruce Vento Sanctuary. Refer to Section 4.6 of the FEIS for a discussion and the results of that analysis.

Issue Summary Noi-016. Concerns in regard to noise impacts on church worship services (1)

Comments:
(CCLRP0961) Noi-07
The noise and gonging produced by the trains will interfere with Sunday worship services. This noise will occur during all seasons of the year but will be more oppressive during the summer months because Central cannot afford to air condition the large sanctuary and must open its front doors to the outside air.

Response Noi-016. The Metropolitan Council performed a Detailed Noise Assessment based on FTA (2006) methods for the FEIS. In addition to the FTA Detailed Noise Assessment Metropolitan Council also performed a bell and horn simulation on Cedar Street, including measurements taken at Central Presbyterian Church with the doors open. As a result of the simulation Metropolitan Council has committed to reducing the bell SEL by either reducing the volume or duration that bells are rung. They have also committed to discontinuing the routine use of horns throughout the corridor. For further information regarding the noise analysis refer to sections 4.6 and Appendix J of the FEIS.

Issue Summary Noi-017. Concerns about maintenance facility noise impacts to National Park and nature sanctuary (1)

Comments:
(CCLRP0985) Noi-15
Significant noise will be made by the switching and turning taking place in the rail yard of the maintenance facility, which would be within a National Park, and adjacent to the Bruce Vento Nature Sanctuary.

Response Noi-017. The Metropolitan Council performed a existing noise level measurements and a Detailed Noise Assessment based on FTA (2006) methods for the Bruce Vento Sanctuary. Category 3 distance to impact for wheel squeal contours beyond the OMF are 16 feet. The Bruce Vento Nature Sanctuary, which reside on the other side of a freight rail line and next to bluffs is over 1000 ft from the OMF. There is no impact calculated at the Bruce Vento sanctuary, nearby freight tracks provide masking, so increase over existing will be minimal or nothing.

Issue Summary Noi-018. Concerns about vibration impacts (7)

Comments:
(CCLRP0969) Noi-26
In addition, there has not been any analysis of construction vibration impacts on such
research nor any proposed mitigations for such construction-induced vibrations. Since many experiments occur over days and even weeks, the equipment would need to be relocated or replaced at another site in order for research to continue during the construction period. Impacting study schedules could impact their grant requirements.

(CCLRP0969) Noi-28
Additional testing is required due to anomalies in the test results on the existing Hiawatha line. These results serve as a baseline for the predictions made for the vibration impacts of the CCLRT line. This calls into question the validity of the predictions made in the report. In addition, since the CCPO conducted initial testing in May, additional research labs have been identified as having sensitive equipment.

(CCLRP0969) Noi-29
Vibration and electromagnetic interference (EMI) impacts on the University - As noted above, the SDEIS does not adequately identify the potential impacts of vibration (both construction-related and operational) and EMI on University research. Rather, the SDEIS notes that these issues will be addressed in the FEIS. The CCPO has provided the University with initial reports that predict significant vibration and EMI impacts and propose potential mitigations for such impacts. These reports are preliminary and conceptual in nature, and do not provide adequate detail as to the effectiveness of these mitigation strategies on the University's most sensitive research. Nor do the reports address impacts on research continuity, research study schedules, future monitoring and on-going maintenance of the proposed mitigation measures.

(CCLRP0994) Noi-31
The SDEIS concludes that three-car trains should not create additional vibration impacts because of the short amount of time it takes for a third car to pass by. (Page 4-46.) There is no analysis of vibration impacts from the entire train when its weight and length are increased by 50 percent.

(CCLRP0994) Noi-32
As acknowledged in the SDEIS (Page 4-46), more information is needed about the vibration impacts of the 14 traction power substations, one of which, according to Figure 2-8 in the SOEIS, will be located right next to MPR's building.

(CCLRP0995) Noi-33
Although the proposed route of the LRT will cut diagonally across the block occupied by the Saint Paul Athletic Club, there appears to be no record of vibration studies having been performed on the building, which is significant in part because of its elaborate ornamental plaster and terra cotta interior. The vibration chapter tacitly acknowledged that a fragile historic resource could be impacted by the LRT (Broadway Alternative, Lowertown Commons section, page 4-65), but the condition of the ornamental interior of the Saint Paul Athletic Club has not been evaluated. The historic churches on Cedar Street (Church of Saint Louis King of France and Central Presbyterian Church) are also located very close to the proposed LRT tracks and their ornamental and structural characteristics also might be harmed by the vibration of the trains. In short, I am unwilling to accept the SDEIS statement
that "it is extremely rare for vibration from train operations to cause building damage" (page 4-64) without further study and documentation.

(CCLRP0995) Noi-34
I also ask that vibration studies and structural analysis be performed on the Saint Paul Athletic Club Building, Church of Saint Louis King of France, and Central Presbyterian Church. At the very least, these studies should be performed as mitigation of the potential effects. If the vibrations will have the potential to cause damage, the routes should be moved or treatment guidelines should be put in place.

Response Noi-018. The Metropolitan Council performed a Detailed Noise Assessment and a Detailed Vibration Assessment based on FTA (2006) methods. The results of these analyses determined that noise and vibration mitigation measures would alleviate potential impacts along Cedar Street. Refer to sections 4.6, 4.7, and Appendix J of the FEIS for information concerning the operation and construction vibration analysis.

Issue Summary Noi-019. Concerns about vibration impacts (4)

Comments:
(CCLRP0952) Noi-02
P 3-93, 94: Should there be mention as to the long-term vibration impacts on the two churches, Conservatory of Music and Athletic Club?

P 4-64: The text on the diagonal alignment should mention the Athletic Club as a historic resource.

(CCLRP0985) Noi-09
The continuous vibration of trains could have an impact on the physical wellbeing of the older structures in the area, including the Church of St. Louis, the Exchange Building, and Central Presbyterian Church. Central Presbyterian Church is on the National Register of Historic Places.

(CCLRP0986) Noi-16
Vibration impacts are included in section 4-7 of the SDEIS. As a listed national historic building, Central is particularly susceptible to the harmful impacts of vibrations during the construction and operation of light rail. Our building does not have a steel superstructure, it is simply stone on stone. This architectural and cultural treasure with some of the best acoustics in the Twin Cities, historical pipe organ, and stained glass windows is at risk.

(CCLRP0986) Noi-17
We request:
Adequately tested high-resilience track fasteners from 10th Street to 7th Street. Ongoing monitoring of vibration effects upon our structure during construction and operation. Interference from vibrations might be immediate and noticeable, but damage to the foundation may be gradual and not detected for years.
Response Noi-019. The Metropolitan Council performed a Detailed Noise and a Detailed Vibration Assessment based on FTA (2006) methods. The results of these analyses determined that noise and vibration mitigation measures would alleviate potential impacts along Cedar Street. Refer to sections 4.6, 4.7, and Appendix J of the FEIS for information concerning the operation and construction vibration analysis.

Issue Summary Noi-020. Concerns about noise impacts on sanctuary environment (1)

Comments:
(CCLRP0986) Noi-19
Persistent and predictable ringing of warning bells with every train, one each way every 7-10 minutes in front of our sanctuary, will disrupt worship, concerts, recording sessions, speakers and other cultural events in a way different than the current soundscape which is much more random in nature. In addition, our historic sanctuary is not air-conditioned further preventing our religious activities from being isolated from outdoor noise.

Response Noi-020. Refer to Appendix J and Section 4.6 for information regarding the noise analysis and testing for Central Presbyterian Church.

Issue Summary Noi-021. Need clarification in regard to impact of warning bell sounds on sensitive noise receivers (1)

Comments:
(CCLRP0986) Noi-18
We have received conflicting information from Met Council staff to the question of whether warning bells will sound on all trains in front of our church at all times.

Response Noi-021. Use of bells at stations and at all at-grade crossings is mandatory for train operators on the Hiawatha LRT and the proposed Central Corridor LRT project. The project team measured LRT bell volume levels on the Hiawatha LRT line and reviewed Metro Transit standard operating procedures for bell use and volume setting. A simulation of LRT horn and bell use on Cedar Street were also performed. The LRT noise simulation discussed in Section 4.6.5.3 of the FEIS determined that LRT horn noise was audible in Studio M and Studio P at MPR and also in St. Louis King of France and Central Presbyterian Church when using volume settings used on the Hiawatha LRT.

As a result of this LRT horn and bell noise simulation, the project team studied the duration of bell use and the bell volume setting. The intent of these activities was to identify an SEL value for the LRT bells that would minimize potential noise impacts throughout the project corridor. Refer to Section 4.6 of the FEIS for more information on this process, and also the LRT horn and bell mitigation measures proposed by Metropolitan Council.
**Issue Summary QI-007. Concerns about vibration impacts (1)**

**Comments:**
(CCLRP0986) QI-08
Our concerns for harmful impacts of operational vibrations are shared by our neighbors Minnesota Public Radio and the Church of St. Louis, King of France. The quality of worship services, concerts, and recordings will be negatively impacted and compromised.

**Response QI-007.** Metropolitan Council performed a Detailed Vibration Assessment in accordance with FTA guidance. The vibration analysis has identified a need for mitigation for the Cedar Street noise and vibration-sensitive land uses such as, Central Presbyterian Church, the Church of St. Louis King of France, and MPR. To mitigate the effect of vibration / ground-borne noise at the above locations Metropolitan Council in proposing to install a floating slab, or alternative mitigation measure. A floating slab consists of a concrete slab supported by elastomer or steel-coil springs. The track is attached directly to the concrete slab using DF fasteners and the springs are supported by a concrete foundation. The frequency range at which a floating slab is effective depends on the thickness of the slab and the stiffness of the springs. Most North American floating slab systems use rubber pads that are 12 to 18 inches in diameter, supporting a concrete slab that is 12 to 24 inches thick. Floating slabs are very effective at reducing vibration levels, but are also very expensive. In addition, potential problems with at-grade floating slabs in areas with a relatively severe climate such as Saint Paul include the effects of freeze thaw cycles and the potential for foreign material to get into the gap under the floating slab and short circuit the vibration isolation.

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**Section: 4.9 – Hazardous/Regulated Materials**

**Issue Summary Ge-001. Hazardous/Regulated materials analysis and required mitigation (1)**

**Comments:**
(CCLRP0952) Ge-01
Finally, in the section on Hazardous/Regulated Materials Evaluation (4.8, Table 4-20, and text on p 4-76) the SDEIS lists a remote possibility that at the Hamline Station construction may encounter contaminants migrating from the Mowery Impoundment site. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.

In the section on Hazardous/Regulated Materials Evaluation (4.8, Table 4-20, and text on p 4-76) the SDEIS lists a possibility that at the Capitol East Station construction may directly affect the Medium potential site located at 610 North Robert Street. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.
The section on Hazardous/Regulated Materials (4.8, Table 4-20, and text on pp 4-76, 78 and 79) references the slope of the water table generally running from higher elevation at Kellogg Boulevard southward toward the Mississippi River and potential migration of contaminants from the USPS Building, former East Kellogg Train Depot and Johnson's Garage/Wells Fargo. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency’s Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.

The section on Hazardous/Regulated Materials (4.8, Table 4-20, and text on pp 78 and 79) outlines the potential sources of hazardous materials, including 12 possible sources. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency’s Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs. The section on Hazardous/Regulated Materials (4.8, Table 4-20, pp 4-78 and 79) states that the Vehicle Maintenance and Storage Facility may directly affect the Former Union Depot Property (site 805) and the Former rail yard (site 809). Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.

Response Ge-001. The comment refers to a number of hazardous material sites identified in the DEIS, SDEIS and/or the Phase I Environmental Site Assessment (ESA) and states that the mitigation will likely include an application to enroll the project in one of the MPCA VIC or VPIC programs. The project will be enrolled in one or both of the MPCA programs. The overall mitigation will also include a Phase II ESA conducted in accordance with an MPCA-approved work plan. The results of the Phase II ESA will lead to plans to field-identify and mitigate contaminated materials encountered near these sites during the course of construction. A construction contingency plan will also be developed to address contaminated materials not identified by the ESAs.

Section: 4.10 - Electromagnetic Fields, Utilities and Distribution Systems

Issue Summary C&F-012. Impact on utilities (7)

Comments:
(CCLRP0986) C&F-15
Work with Central to minimize financial hardship from relocating district utilities

(CCLRP0986) C&F-16
According to District Energy, the SDEIS is incorrect in stating the impacts of the proposed LRT line on utilities costs. These costs, if passed on to consumers, could prove too expensive a hurdle for Central Presbyterian Church to absorb. We request that the relocation of utilities be taken seriously, understanding that the costs involved are direct ramifications of the selection of Cedar Street
(CCLRP0985) C&F-30
There will be a significant impact on infrastructure under Cedar Street, in particular as it will impact District Energy.

(CCLRP1020) C&F-32
It is essential that this critically important central corridor project continue to move forward but not be achieved at the expense of one of St. Paul's true renewable energy success stories. Solutions must be found to help mitigate the impacts this project is having on District Energy, District Cooling, and our customers.

(CCLRP0987) C&F-34
For example, in Section 4.9.5.2 Utilities, Page 4-86, the SDEIS states concerning the Capitol Area Alignments/Stations that "District Energy's large heating and cooling pipelines would likely be affected, but not substantially. The shallow district heating and cooling distribution systems service 75 percent of the downtown St. Paul area. The modified AA/DEIS LPA alignment is not proposed to extend more than 2-feet bgs in this locations.

(CCLRP0987) C&F-35
The serious concerns we raised about the impacts this project will have on our critical heating and cooling piping systems were understated in the Draft EIS. Unfortunately, the SDEIS continues to undervalue the adverse, potentially devastating, impact on our small renewable energy companies.

(CCLRP0987) C&F-36
Unless funding solutions can be found, all costs will be borne by our small customer base, which would be harmful to all. Neither the DEIS or the SDEIS recognizes the significance this impact could have on downtown Saint Paul building owners and businesses. We and our customers continue to face a serious problem, and construction of this project is potentially just over a year away.

Response C&F-012. The potential impacts to District Energy and its customers are taken seriously. Efforts to minimize and mitigate impacts with existing utilities and mitigation strategies will continue through final design. A discussion of impacts to utilities is discussed in Section 4.9 of the FEIS.

Issue Summary C&F-028. Impact on utilities (3)

Comments:
(CCLRP0961) C&F-20
3. I understand that St. Paul District Energy will have to pay for the relocation of the underground heating and cooling utilities, and appropriately increase the fees charged to all customers. However, I believe that Central will have to pay for the relocation of the other underground utilities servicing the building. We are a struggling downtown church.
As 501(c)3 nonprofits form to lessen the burdens of government and serve the energy needs of this community, we do not have the means to cover these costs. Unless funding solutions can be found, all costs will be borne by our small customer base, which would be harmful to many.

The total estimated cost of the impact continues to be approximately $20 million ... $17.6 million for new piping and fiber and $2.4 million for demolition. As 501 (c)(3) nonprofits, formed "to lessen the burdens of government" and serve the energy needs of this community, we do not have the means to cover these costs

Response C&F-028. Efforts to minimize and mitigate impacts with existing utilities will continue through final design. Utility relocation reimbursements for private utility owners is not permitted unless circumstances described within state statues, rules, laws and regulations can apply.

Issue Summary Ci-003. Utility impacts (1)

Comments:
(CCLRP1020) Ci-03
The serious concerns we have raised about the impacts this project will have on our piping systems and the heavy impact on our customers remains understated. While the SDEIS does a better job of documenting those impacts than the draft EIS, it seriously understates the extent of the impact.

Response Ci-003. Impacts to utilities are discussed in Section 4.9 of the FEIS and preliminary engineering plans were based on information received from District Energy regarding the placement of their utilities.

Issue Summary Ci-004. District Energy utility impacts (1)

Comments:
(CCLRP0987) Ci-04
Solutions must be found to mitigate the impacts this project is having on District Energy, District Cooling and our customers. To continue to understate, under estimate and even minimize the seriousness of the impacts on our renewable energy program and our customers, first in the Draft EIS and now in the Supplemental Draft EIS, is not an acceptable practice. As a result of the information set forth above, we question whether the SDEIS meets the minimum statutory and regulatory EIS requirements.

Response Ci-004. Comment noted. Impacts to utilities generally, and to District Energy specifically, are discussed in Section 4.9 of the FEIS.
Issue Summary Ci-005. **District Energy utility impacts** (1)

**Comments:**
(CCLRP0987) Ci-05
The Central Corridor LRT Project continues to impact approximately 2 miles of our most critical piping systems. It also continues to impact our fiber optic communication systems which are also used by the State of Minnesota, Ramsey County and City of Saint Paul.

Response Ci-005. Impacts to utilities are discussed in Section 4.9 of the FEIS and preliminary engineering plans were based on information received from District Energy regarding the placement of their utilities.

Issue Summary Ci-006. **Utility Impacts** (1)

**Comments:**
(CCLRP0987) Ci-06
The SDEIS also does not accurately document the depth of our piping systems. Section 4.9.3.2 Existing Utilities (page 4-85) states that our chilled water piping is typically located 4 feet below grade and our hot water piping is typically located 6 feet below grade. This too is incorrect. Our comments on the DEIS pointed out that our piping systems are typically 2 to 4 feet below grade and detailed information on the depth of our systems was provided to the Project Office early in the preliminary engineering process.

Response Ci-006. Comment noted. The CCPO did receive information from District Energy regarding the location of their utilities in St. Paul and preliminary engineering design plans as well as information contained in the FEIS in Section 4.9 is based on this information.

Issue Summary Ci-007. **District Energy utility impacts** (1)

**Comments:**
(CCLRP0987) Ci-07
The impact on District Energy's heating and cooling piping in this area is in fact very substantial. The grade cuts and station changes in the modified alignment in this area are now significantly impacting piping that was essentially unaffected in the approved LPA alignment. District Energy raised concerns with the Project Office about impacts resulting from the proposed changes near the capitol well in advance of the SDEIS being published.

Response Ci-007. Utility impacts resulting from the Preferred Alternative are discussed in Section 4.9 of the FEIS.
Issue Summary Ge-014. Clarification/Information needed in regard to U of M utilities

Comments:
(CCLRP0969) Ge-16
Existing Utilities - Water Service - The University needs clarification/confirmation on service to University buildings in the area of the West Bank station is privately owned.

(CCLRP0969) Ge-18
Existing Utilities - Communication Service Lines - The University needs clarification/confirmation on what University communication utilities it owns/is responsible for and the implications of that ownership/responsibility.

Response Ge-014. Efforts to minimize and mitigate impacts with existing utilities will continue through final design. The final design team will be able to answer questions regarding specific utility concerns.

Issue Summary Lu-021. Utility improvements (1)

Comments:
(CCLRP0983) Lu-22
Consider the opportunity to bury Xcel power lines through the Prospect Park Neighborhood

Response Lu-021. Private utilities are responsible for relocating lines at their own expense. Permits approval from MnDOT would also be required.

Section: 5.1 - Economic Conditions

Issue Summary C&F-034. Revise noted report figures, tables and text (1)

Comments:
(CCLRP0952) C&F-37
• P 5-4, Section 5.2.1: dated statement should be removed about "...downtown Saint Paul is currently experiencing a boom in loft and condominium housing."

Response C&F-034. The text in the FEIS has been updated to reflect this change.

Section: 6.1 - Transit Effects

Issue Summary Bp-009. Support of Park and Rides for LRT (1)

Comments:
(CCLRP0964) Bp-17
Figure 1-10 - No Park and Rides are shown on the Central Corridor.
**Response Bp-009.** The Preferred Alternative does not include any park and rides. This is consistent with the City of St. Paul plans.

**Issue Summary Ge-009. Snow removal plan (1)**

**Comments:**
(CCLRP0965) Ge-09
And there is no snow removal plan.

**Response Ge-009.** The Metropolitan Council, in consultation with the cities of Minneapolis and St. Paul, will develop a long term management plan that includes identification of responsibilities for snow removal.

**Issue Summary Pp-025. Connectivity with other mass transit projects systems (existing and proposed) (1)**

**Comments:**
(CCLRP0983) Pp-11
The DCC notes that EIS statements are being or have been prepared for extensions of the Hiawatha LRT Line and the North Star Commuter Corridor. Since the Central Corridor connects with these projects, we believe the Central Corridor FEIS should acknowledge pertinent findings in the CCLRT Public Record.

**Response Pp-025.** Comment noted.

**Issue Summary T-002. Concerns about changes to existing mass transit system, and related impacts especially for elderly and persons with mobility issues (3)**

**Comments:**
(CCLRP0963) T-006
Diminished mass transit service will be a hardship for handicapped and elderly. An unusually large number of handicapped and elderly individuals live in Cedar-Riverside, particularly in the subsidized units of Riverside Plaza (said to be the highest housing density in the U.S. west of the Mississippi) and The Cedars of the Minneapolis Public Housing Authority. Reduced frequency of Nr. 16 bus service and the typical distance of one mile between stations on the proposed Central Corridor LRT line will put the handicapped and elderly at a great disadvantage. A basis for action may exist under the with Disabilities Act or other legal provisions.

(CCLRP0965) T-008
And who speaks for the ADA and seniors and those who can only walk a few yards to their stop from the bus or from their car to their destination? The light rail means nothing for them.
Comment and Response Report

Central Corridor LRT Project
SDEIS

Appendix K.8

In a letter to Metropolitan Council Chair Peter Bell in January 2008 (Appendix B), we stressed the importance of including stops at Western, Victoria and Hamline and continuing the current 8-12 minute schedule of service for the #16 local bus on University Avenue. As we noted in our letter, if these additional stations are not included in the project and #16 bus service is cut back to 20-30 minute frequencies, "...many residents along University Avenue will be faced with reduced transit access once the light rail is built." Providing additional bus service by adding #83 bus on Lexington and #60 circulator from Victoria to Hamline and south to St Clair does not provide adequate mitigation for residents and businesses near Western, Victoria and Hamline. The Metropolitan Council Response to the DCC Report (January 2008) claims that these additional bus lines will provide access to transit within a .-mile of most locations. But this does not offset the lack of direct access to LRT and the greatly reduced service of the #16 bus, which has the second highest ridership in the entire Twin Cities metro area.

Response T-002. Comment noted. Transportation equity issues, both in terms of construction and operation of the Central Corridor LRT with respect to all individuals, communities, and neighborhoods immediately adjacent to the project area are a critical concern for the Metropolitan Council. To address community access and mobility issues in the Midway East Segment and to respond to community concerns regarding station spacing, the Metropolitan Council continues to evaluate the future stations at Hamline Avenue, Western Avenue, and Victoria Street. As described in SDEIS Section 3.8.4.2, the underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. While the frequency of scheduled service for the Route 16 would be reduced, the introduction of LRT service running at 7.5 minutes during the peak hour periods and the additions of re-routed bus routes and new circulator bus routes (Route 60 and Route 83) help to improve end-to-end run times along the corridor. The Metropolitan Council conducted an analysis of transit access based on FTA methodology to judge whether there would be an overall increase or decrease in transit access to neighborhoods surrounding the Central Corridor. The transit access study is included in Appendix J of the FEIS. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in Section 3.8 of the FEIS.

Issue Summary T-010. What is gained benefit to mass transit system between downtown Minneapolis and U of M (1)

Comments:

(CCLRP0969) T-020
Buses already connect the University Twin Cities Campus to downtown Minneapolis. What type of additional connections will the LRT provide?
Response T-010. Central Corridor LRT service between the West Bank and East Bank stations would improve connectivity across the Mississippi River for the neighborhoods around the U of M such as Prospect Park and the Cedar-Riverside. In addition to the campus buses that transport students, neighborhood residents and students alike would also have improved access to the U of M and the two downtowns with this addition to the local transit system.

Issue Summary T-019. Support of Park and Rides for LRT (2)

Comments:
(CCLRP0966) T-042
Park and Rides are critical; the "bus barn" site would be an ideal location The advocates that are getting the rail built should be convinced by marketing data that park-and-rides need to be built in order for this rail line to be successful, even if they may be adamant that parking be made available only to people who drive Dodge Volt plug-in electric cars. The "bus barn" site at Saint Anthony and Snelling offers an ideal location for a major light rail station near University Avenue (Central Corridor) This site offers the possibility of underground commuter parking

(CCLRP0954) T-043
We support a 1000 slot park and ride at the bus barn site and under Midway Center (Snelling Avenue and St Anthony Blvd./Snelling Ave and university Avenue) to serve State fair goers, the I94 bus route, the 84 bus route, the 21/53 bus route, the 16/50 bus route, the 144 bus route, the future CCLRT rail, a future Snelling Avenue rail line, and small businesses and local residents who lose parking with construction of the rail.

Response T-019. The Preferred Alternative does not include any Park and Ride Facilities.

Issue Summary T-021. Support of Park and Rides for LRT (1)

Comments:
(CCLRP0965) T-051
Met Council must include additional park and ride lots inside and outside of St. Paul to assure suburban ridership and protect neighbors/businesses from park and hide patrons using residential and small business parking,

Response T-021. The Preferred Alternative does not include any Park and Ride Facilities. The City of St. Paul is aware of neighborhood concerns about "park and hide" activities in residential areas adjacent to the Central Corridor. The City of St. Paul is looking at strategies to discourage "hide and rider" use of on-street parking in the residential areas including strategies that the City of Minneapolis has successfully implemented to minimize "hide and ride" impacts in neighborhoods adjacent to the Hiawatha LRT. See Section 6.3 of the FEIS for further details.
Issue Summary T-027. **Support of Park and Rides for LRT** (1)

**Comments:**
(CCLRP0983) T-067
New parking should be established at the major entrances to the University and bus service from the new lots could efficiently circulate through the campus. New lots near I-94 and Huron, I-35W at both Washington and University/4th Street would significantly reduce the traffic on the local streets.

**Response T-027.** There are no plans to include additional parking at or near the U of M as part of the Central Corridor LRT Project. Traffic and parking impacts are discussed in Chapter 6 of the FEIS.

Issue Summary T-030. **Questions ridership analysis** (1)

**Comments:**
(CCLRP0974) T-083
6.1.4.4 - p. 6-8; LRT Station Volumes, Table 6-6-3 - Total daily boardings at the Government Plaza of 780 by 2030 seems very low.

**Response T-030.** Comment noted. Central Corridor LRT ridership modeling is discussed in Chapter 6 of the FEIS.

Issue Summary T-035. **Questions benefit of LRT to overall mass transit system** (1)

**Comments:**
(CCLRP1007) T-088
it's eight minutes per the MPC to go from the Warehouse District Station to the Downtown East Metro Station. Taken eight minutes for that. Then after that you've got 15 stops which take around 30 seconds and I've seen some as long as 52 seconds. So that would add about another 8 minutes. And you've got another 9.9 miles at 15 miles an hour and the Hiawatha line has a 15 miles an hour speed limits on South Fifth Street. Adding that up, you get 55.6 minutes and that doesn't include any acceleration time. That includes minimum times for stops. So unless you're violating the laws of physics, this light rail will be significantly slower.

**Response T-035.** Travel times and operating assumptions for the Central Corridor LRT project are discussed in Chapter 2 of the FEIS.

Issue Summary T-057. **Bus Frequency** (1)

**Comments:**
(CCLRP0952) T-124
• The City recommends enhanced at least 15-minute peak-hour service (15-minute frequency or better) on Rice, Dale, Lexington, Snelling, and Fairview/Raymond as part of the overall LRT project.
Response T-057. Additional transit system enhancements, including additional north-south feeder bus routes and increased service frequencies, are detailed in Section 6.1 of the FEIS.

Issue Summary T-070. Reduce train speed for safety (1)

Comments:
(CCLRP0986) T-153
Restrict train speed to 10 MPH in front of Central's building.

Response T-070. The trains will travel a maximum of 20 mph along Cedar Street. Since Central Presbyterian Church is very close the 10th St station, it is likely the trains will be traveling around 5 mph as they approach or depart the station.

Issue Summary T-074. Report corrections needed (3)

Comments:
(CCLRP0974) T-157
6-24, Section 6.3.2 Access Minneapolis - References were made to the Downtown Plan. Please also note the draft Citywide Plan: http://www.ci.minneapolis.mn.us/public-works/trans-plan/ This draft Citywide Plan is currently being updated and CCLRT should consult with Minneapolis for pending changes. The Citywide Plan is anticipated to be adopted this year.

(CCLRP0974) T-166
• 6-18, U of M Alignment, 1st paragraph - Other transit buses besides Metro Transit and U of M will most likely use the transit mall.

(CCLRP0974) T-171
5-10 (University/Prospect Park) - Need to modify statement "Washington Avenue would be closed to all vehicle traffic" to add "except buses"

Response T-074. The text in chapter 6 of the FEIS was changed to reflect the information provided by this commenter.

Issue Summary T-084. Reduce train speed for safety (1)

Comments:
(CCLRP0969) T-179
The LRT operating speed for the campus portion of the corridor, including the Washington Avenue Mall, needs to be determined. The SDEIS states the average operating speed is 16 mph. Given the nature of the Washington Avenue Mall, the operating speed must be less in order to provide a safe, pedestrian-oriented environment.

Response T-084. The trains will travel a maximum of 20 mph along this portion of Washington Avenue. Vehicles currently are permitted to operate at speeds of 30 mph.
Issue Summary T-086. Add further discussion about character of trips to U of M (1)

Comments:
(CCLRP0969) T-182
Chapter 1 does not adequately discuss the character of trips to the University campus beyond those as an employment center. The University provides many services to the public, including a vast number of medical services, as well as entertainment and sports venues, which bring numerous visitors to the campus each day, many of whom visit this area infrequently.

Response T-086. The text referred to in the comment was modified to read: • University / Prospect Park's largest employer is the U of M, with its administrators, faculty, and hospital staff, specifically, those from the Fairview Hospital and Clinics. Additional employers are Augsburg College, and heavy to light industries in the Southeast Minneapolis Industrial (SEMI) area, which is just north of University Avenue. The U of M also provides many services to the public including a vast number of medical services, entertainment opportunities, and sporting events, which bring numerous visitors to the campus each day.

Section: 6.1 - Bus System Impact Concerns

Issue Summary Bp-004. Concerns about impact to bus system, and comments about sidewalk widths (3)

Comments:
(CCLRP0993) Bp-11
We are also very concerned that bus routes and bus service be maintained so that our neighborhood residents have access to mass transit. From the maps we have seen about diverting traffic when Washington Avenue is closed, we especially worry about Route #2 being changed. This is heavily used by our neighborhood and is our access to East and West Bank U campuses. We need the University bus route across 10th Avenue bridge to stop at University Avenue. If we are to access the Cedar/Riverside Central Corridor LRT stop this is especially needed or a Metro Transit bus across that bridge.

(CCLRP0983) Bp-13
• The effect on short length bus service and access to bus stops

(CCLRP0996) Bp-20
We feel that at a minimum, the sidewalks on University Avenue should be 14' wide. A 14' sidewalk would allow for: 2' door zone so that opening and closing doors do not obstruct pedestrian traffic; 6-8' walk zone (6' minimum needed for passing strollers or passing wheelchairs); 4-6' furniture zone for street trees, garbage receptacles, benches, lighting, bike racks, and snow pile in winter months

Response Bp-004. Comment noted. The Central Corridor LRT project intends to reconstruct the sidewalks along University Avenue in accordance with the most recent
sidewalk and ADA compliant design standards to ensure the safety and comfort of pedestrians and bus service at the U of M along University Avenue. Existing sidewalk widths were maintained where possible, however, sidewalk width at a minimum along University Avenue will be 10 feet in width with the LRT. A description of bicycle and pedestrian facilities, area plans, and impacts to these facilities as they pertain to the Central Corridor LRT project is provided in the FEIS.

**Issue Summary Bp-005. Impact to bus system** (1)

**Comments:**
(CCLRP0965) Bp-12
The current #16 bus schedule as of 08-08-08 must be funded from now through construction and continued for at least 10 years 24/7 everyday after the LRT is operational and the three additional stations are built and operational.

**Response Bp-005.** The frequency of the #16 bus route will be reduced with the completion of Central Corridor LRT project. Additional routes (the 60 and 83), among other changes, will be implemented. Impacts to the transit system are discussed in Section 6.1 of the FEIS.

**Issue Summary Bp-006. Need improved bus system coordinated with LRT** (1)

**Comments:**
(CCLRP0969) Bp-14
The specifics of how the LRT and buses will interface, with each other and other modes, are not yet determined. The on-campus bus routes are not yet determined.

**Response Bp-006.** Buses would interface with Central Corridor LRT project in a manner that is similar to how they currently interface with Hiawatha LRT. Transit effects, including planned bus routes, are discussed in Section 6.1 of the FEIS.

**Issue Summary C&F-004. Project will produce reduced transit access for many** (1)

**Comments:**
(CCLRP0999) C&F-04
The reduced transit access described above also has economic consequences for residents and businesses near Western, Victoria and Hamline, including:
- Significant increases in time required for residents and local business owners and workers to travel to and from work and other necessary destinations;
- Loss of business opportunities for small business owners located near Western, Victoria and Hamline, due to reduced transit access for customers, while competitors adjacent to LRT stations enjoy improved access;
- Reduced incentive for new development to locate in these areas.

**Response C&F-004.** Transit access is discussed in Section 6.1 of the FEIS. A financial analysis of the Central Corridor LRT project is discussed in Chapter 8 of the FEIS. Economic effects are discussed in Chapter 5 of the FEIS. The transit access study conducted by the Metropolitan Council is available in Appendix J of the FEIS.
Issue Summary T-004. Impact to bus system (1)

Comments:
(CCLRP0953) T-011
I hope that no busline will be discontinued except the #50. Those in assisted living depend on busses for shopping.

Response T-004. Under the Preferred Alternative, the only route that will be discontinued is Route 50. See Section 6.1 of the FEIS for further details.

Issue Summary T-068. Concerns about impact to existing bus system (9)

Comments:
(CCLRP0963) T-142
Mass transit service will be diminished in Cedar-Riverside light rail line will have many fewer stops, compared to the Nr. 16 bus that runs on essentially the same route. time of the new trains will be approximately the same as limited stop Nr. 50 bus that runs on the Nr. 16 route. Local. authorities state that the Nr. 16 bus will continue to run, a much reduced frequency. In other words, the proposed LRT line simply replaces the Nr. 50 limited stop bus, and passengers who wish to stop at other destinations along the route will have to wait much 1 than at present for appropriate service by Number 16 bus.

(CCLRP0999) T-144
Provide a complete network of bus service, with the current frequency of the #16 bus maintained to accommodate transit riders getting on or off between LRT stations, especially if the stations are more than 1/2 mile apart;

(CCLRP0965) T-145
Then what about the reduction in the #16 Bus service, including time between schedules, and the fact that there will be even a further reduction for the midnight shift workers when no LRT runs after 2 and before 5 AM. Have you ever ridden the #16 at 2 or 2:30 or 3 or 4 AM? They are the hard working people who are doing the cleaning and baking, garbage hauling and loading trucks, and delivery drivers and nurses. Who speaks for those workers and residents?

(CCLRP0991) T-146
Second, we recommend reinstatement of the Route 16 service in the non-peak hours to existing levels and insist that all bus service must be retained at levels that meet the needs of the most transit-dependent people who disproportionately live along the corridor.

(CCLRP0952) T-147
First, cuts to the Route 16 service, especially in non-peak times, are particularly short-sighted. Many who use the Route 16 are transit-dependent, many with mobility issues. Those people often travel in the non-peak hours: weekday off-peak, evenings and weekends. The City recommends reinstatement of the maintaining current Route 16 service in the peak and
non-peak hours to existing levels. Fifteen-minute peak hour service should be instituted on all primary north/south streets. This will not only bolster ridership on the LRT and serve transit-dependent populations, it will also take pressure off of informal park & ride/hide and ride along a corridor which will lose most of its on-street parking. The City recommends enhanced at least 15-minute peak hour service (15-minute frequency or better) on Rice, Dale, Lexington, Snelling, and Fairview/Raymond as part of the overall LRT project.

(CCLRP0952) T-148
• The City recommends reinstatement of the maintaining current Route 16 service in the peak and non-peak hours to existing levels.

(CCLRP0983) T-149
c. Re-routing the #16, possibly going into downtown Saint Paul via Rice Street rather than MLK Boulevard. The SDEIS does not disclose impacts of re-routing on transit riders. Adverse impacts may include longer walk trips for #16 bus riders visiting or working in the Capitol area, longer walk trips to the LRT station at Rice, and longer bus transit travel times into downtown Saint Paul.

(CCLRP0983) T-150
The SDEIS states that the frequency of the #16 bus route will be reduced from the AA/DEIS assumption of every 10 minutes all day to every 30 minutes during off-peak hours and every 20 minutes during peak hours. The DCC is concerned that this level of transit serve will not adequately serve the needs those whose trips do not begin or end within a quarter mile walk of an LRT station.

(CCLRP0998) T-151
Service on the #16 bus should be maintained at a high frequency level. North/south bus service connecting with the corridor should be greatly expanded.

Response T-068. While the frequency of scheduled service for the Route 16 would be reduced, the introduction of LRT service running at 7.5 minutes during the peak hour periods and the additions of re-routed bus routes and new circular bus routes (Route 60 and Route 83) help to improve end-to-end run times along the corridor. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in Section 3.8 of the FEIS. Transit effects are discussed in Section 6.1 of the FEIS.

Issue Summary T-085. Include increased U of M shuttle bus system costs in project plans (1)

Comments:
(CCLRP0969) T-181
Increased operating costs for the University of Minnesota shuttle bus system need to be accounted for in the traffic management plan and construction sequencing plan.
Response T-085. There is no evidence to suggest that the CCRLT will increase costs for the University of Minnesota shuttle bus system. With the removal of automobile traffic, buses may experience less delay, and possibly lower operating costs.

Issue Summary T-091. Need improved bus system coordinated with LRT (1)

Comments:
(CCLRP0965) T-190
Feeder service within the corridor and suburbs must be included upon completion in order to assure the success of the system.

Response T-091. Additional north-south bus connections are being planned. See Section 6.1 for further details.

Section: 6.1 - Report Corrections Needed

Issue Summary T-052. Unclear report text needs to be clarified (1)

Comments:
(CCLRP0969) T-112
4th Street SE does not access the Washington Avenue Bridge-meaning here is unclear.

Response T-052. 4th Street SE was changed to 4th St South, which does access the Washington Avenue Bridge.

Issue Summary T-054. Update noted report figures and text (3)

Comments:
(CCLRP0964) T-115
Page 1-19, line 19-21 states: "Half of the locations on both University and Washington Avenues were projected to be operating near capacity in Year 2000 (Metropolitan Council, 2000), and the projections for Year 2030 show traffic growth at every location along these arterial roadways." Mn/DOT Comment Figure 1-9 shows decreased traffic volumes on University Avenue between Snelling Avenue and Rice Street. The figure runs counter to the statement in the SDEIS.

(CCLRP0964) T-121
Chapter 1: Figure 1-9 - The 2030 volume on I-94 just east of TH 280 appears to be wrong. It increased only 1000 in 25 years.

(CCLRP0983) T-134
Figure 1-9 Historic and Projected Traffic on University Avenue, I-94, and Washington Avenue (p. 1-20). This figure shows decreases in 2030 traffic counts over 1995 and 2005 Counts. When questioned, Project staff suggested this may be an error. If so, it should be corrected because it is misleading and the public may conclude (and has) that there may be
more options for resolving on-street parking problems than is the case.

Response T-054. The figure and text were revised to be consistent with each other and the latest available traffic data for the Central Corridor study area.

Issue Summary T-079. Report corrections needed (5)

Comments:
(CCLRP0974) T-164
6-18, 1st full paragraph - The SDEIS declares the LOS will improve on the bridge but they have not disclosed the data or analyses stating what the LOS would be on the bridge with Wash Ave closure. Lower volume does not necessarily equal LOS improvements if you also make other network (lanes, intersections) changes. In both scenarios, with and without Washington Ave closed, we have a lot of traffic being handled differently and thus LOS may be similar or different depending on a number of factors. The analysis behind this statement should be disclosed

(CCLRP0974) T-172
Signal design and intersection capacity issues. The impacts to the following intersections have not been fully evaluated or disclosed in the DEIS or SDEIS:
- Huron, University and Washington - complex operation and long clearance time
- Chicago, 4th St, 5th St and Portland - complex operation and long clearance time
- 2nd Ave N and 5th St - complex operation and long clearance time
- 11th Ave S crossing increased number of trains and operation of interlock between Hiawatha LRT and CCLRT

(CCLRP0969) T-177
10.3 10-5 Issues to be Resolved - This area is lacking in necessary detail. All the specific issues regarding transportation impacts, including bicycles and pedestrians, traffic rerouting, etc. should be detailed here.

(CCLRP0969) T-180
Comparative Evaluation of the AA/DEIS and Proposed Changes Determine effects of on campus mitigations for closure of Washington Avenue to vehicular traffic.

(CCLRP0964) T-187
Page 9-17 - Impacts discussed under the third column of the chart on this page will likely divert traffic to 1-94. We don't agree with the statement in the fifth column that 1-94 congestion may grow at a less rapid rate with implementation of the Central Corridor LRT, and there is no data in the SDEIS to support the statement in the table.

Response T-079. Traffic impacts with updated data are discussed in Chapter 6 of the FEIS.
Issue Summary T-080. Report corrections/clarifications needed (5)

Comments:
(CCLRP0974) T-165
• 6-18, 2nd full paragraph - SDEIS states the new LRT gate near Cedar Ave would be closed every 7.5 minutes. This is only true for one LRT direction or if both directional trains would meet exactly at the same time every time. Thus this impact analysis needs to account for that the two directional trains will not meet, so the headways related to the gate should be 3.75 minutes.

(CCLRP0974) T-173
6-20, 1st paragraph - The last sentence reference to 4th St SE is confusing.

(CCLRP0964) T-184
Page 6-16 - In Table 6-5, the heading that says "2006 ADT" should say "2005 ADT".

(CCLRP0964) T-189
Page 6-12 - A reference should be provided for the LOS Table at the bottom of the page.

(CCLRP0952) T-193
• P 6-2, 6.1.3.2 Baseline Alternative: The text states (l 11) that the enhanced Route 50 would be identical to the service assumed for the LRT Alternative. However, the Route 50 has two stops not planned for the LRT: Vandalia and Albert, and numerous stops in downtown.
• P 6-25, 6.3.2.2 "Downtown St. Paul and Capitol Area," second paragraph, the first sentence should read "The City of Saint Paul is in the final planning phases for adopting a citywide transportation plan with a strong focus on improving the bicycle system." And strike the sentence beginning on line 5: "The ten-year goal..."
• P 6-26, line 3: amend to read "...and integrating at least one east/west bicycle route parallel..."
• P 6-26 Midway East/Midway West add text reflecting that a separate plan done by Saint Paul in Fall/Winter, 2008 will specifically study and recommend bicycle and pedestrian accommodations and connections.
• P 6-26 Midway East/Midway West could include clarifying language "...bicyclists frequently travel along segments of University Avenue as part of their commute due to the unusually wide outer traffic lanes." And also potentially add "Bicycle storage is largely unavailable for residents, employees or customers along University Avenue in Saint Paul."
• P 6-27 Midway East/Midway West the SDEIS is incorrect in assuming that because pedestrian conditions are poor, people do not walk in the area. It would be more accurate to say on P 6028, last sentence "Pedestrian activities are lower in this area due to development patterns and traffic conditions. However, because of the high percentage of households without vehicles in the adjacent communities, walking is a necessary part of every day transportation in these neighborhoods."
Response T-080. The FEIS has been updated to reflect these comments. The gate near Cedar Avenue would only impact eastbound traffic.

Section: 6.2 - Effects on Roadways

Issue Summary A-011. Impact to Washington Avenue Bridge (1)

Comments:
(CCLRP0969) A-15
Washington Avenue Bridge - The upper deck of the Washington Avenue Bridge currently accommodates bicycles in addition to pedestrians. This should continue after the construction/operation of LRT. Structural redundancies will need to be added to the Bridge to address the "fracture critical" designation

Response A-011. The upper deck of the Washington Avenue Bridge is expected to accommodate bicycles and pedestrians as it currently does when LRT is in place and operating. Hennepin County is accelerating design and construction of interim improvements. The design is being revised to add elements to the lower bridge deck to ensure structural redundancy. See Chapter 6 of the FEIS for further details.

Issue Summary Pp-026. Impact on Washington Avenue Bridge (1)

Comments:
(CCLRP0983) Pp-12
The DCC remains concerned about the age and condition of the Washington Avenue Bridge and potential incongruence with the new LRT facility, which will have a long lifespan. The FEIS has only a 10-day comment period, which is a very limited time for public disclosure and debate around a critical element of the project. Leading up to the FEIS, the CCLRT project should disclose to the public incremental findings of bridge studies, which would allow for adequate public review and for decisions-makers to take public input into account.

Response Pp-026. Comment noted. Numerous presentations were made to stakeholder groups, including the CAC and the CCMC regarding findings of the Washington Avenue Bridge during the process of surveying the existing structure, identifying issues that exist with this structure under existing conditions and issues that would have to be addressed were it to be used for LRT operations. A discussion of Washington Avenue Bridge improvements is included in Chapter 2 and Chapter 6 of the FEIS.

Issue Summary T-049. Impacts to Interstate system (2)

Comments:
(CCLRP1003) T-108
The SDEIS is unclear as to possible effects to the Interstate system (I-35W, I-35E and I-94) due to the LRT construction and operation. We request a meeting with FHWA staff to better understand the potential effects to Interstate operations and right of way from the project.
There is no SDEIS discussion of traffic impacts to the regional system. This project will impact 1-94, 1-35W, TH 51 (Snelling Avenue) and TH 280, and we would like to see those impacts quantified. For example, placing LRT on the Washington Avenue bridge will reduce traffic capacity from an important river crossing, presumably forcing traffic onto other roadways, such as 1-94 and I-35W. It is unclear if a new bridge or reduced capacity on the existing bridge was considered in the traffic modeling.

Response T-049. A meeting to discuss regional traffic impacts of Central Corridor LRT, as requested, was held on September 19, 2008 with staff from the CCPO and staff from MnDOT and FHWA. As a result of this meeting, all traffic modeling data was submitted to MnDOT for their review. There are no direct impacts to interstate operations nor right-of-way anticipated to result from the Preferred Alternative, which is intended to increase transit trip-making and decrease reliance on single-occupant vehicles. The exception to this statement occurs at the West Bank area in the Cedar-Riverside community where a slight change is proposed to the northbound I-35W off ramp. This change is depicted and discussed in Section 2.2 and Section 6.2 of the FEIS. An interstate access request (IAR) will have to be completed and submitted to the FHWA through MnDOT after the ROD is complete and prior to project construction.

Issue Summary T-063. Signals at Weissman Museum intersection (1)

Comments:
(CCLRP0983) T-135
• Signals at Weissman Museum intersection. An expansion of the Museum has already been approved in the Washington Avenue bridge area.

Response T-063. A traffic Signal at East River Road and the eastbound Washington Avenue exit is part of the mitigation commitments agreed to in the Memorandum of Understanding. See Chapter 6 of the FEIS for further details.

Issue Summary T-083. Report clarification requested (1)

Comments:
(CCLRP0969) T-176
Existing Conditions - Changes at the University of Minnesota The University requires clarification as to how the TCF Stadium affected the alignment for the planned Granary Rd.

Response T-083. This is not within the scope of this project.

Issue Summary T-089. Impacts to Interstate system (1)

Comments:
(CCLRP0964) T-186
Page 6-17, 6-18 - Is Option 303 the preferred alternative? Mn/DOT has concerns with the proposal that stops I-35W exit ramp traffic onto 4th Street because of likely freeway impacts.
Response T-089. The Preferred Alternative includes a revised I-35W exit ramp in response to comments received on the SDEIS. The Preferred Alternative is detailed in Chapter 2 of the FEIS. Traffic impacts are discussed in Chapter 6 of the FEIS.

Section: 6.2 - U of M Transit Mall Concerns

Issue Summary Lu-026. Washington Avenue Mall impacts (2)

Comments:
(CCLRP0969) Lu-28
This description needs better discussion/acknowledgement of the change in traffic patterns associated with the Washington Avenue Mall impacts on the land use and social setting in the broader University neighborhoods.

(CCLRP0969) Lu-29
University of Minnesota Alignment This description needs better discussion/acknowledgement of the change in traffic patterns associated with the Washington Avenue Mall impacts on the land use and social setting in the broader University neighborhoods.

Response Lu-026. Text addressing the commenter's concerns was added to Section 3.1 of the FEIS. Also see Chapter 6 for a discussion of traffic impacts.

Issue Summary Pp-042. Impact and mitigation for U of M Washington Avenue Mall area (1)

Comments:
(CCLRP0969) Pp-63
Washington Avenue Mall Design The University and partners are working together to identify a design and engineering solution for the Washington Avenue Mall. The University looks forward to resolving the outstanding design and operations issues in order to develop a plan that will meet the University's approval, as specified in the Memorandum of Understanding.

Response Pp-042. Comment noted.

Issue Summary T-011. Impact and mitigation for U of M Washington Avenue Mall area (1)

Comments:
(CCLRP0969) T-021
6-32 The University has concerns with the mitigation measures planned for the Washington Avenue Mall area. More detail and collaboration is needed in this area.
Response T-011. Private vehicles will be diverted to adjacent roadways, but with the implementation of mitigation efforts being developed at this time, alternate routes, additional traffic signals, and modifications to traffic lanes will help moderate the impact of additional traffic on these streets. The Metropolitan Council is committed to the mitigation efforts and working with the U of M as detailed in the Memorandum of Understanding. See Chapter 6 of the FEIS for further details.

Issue Summary T-076. Further analysis/clarifications needed for traffic on U of M Transit Mall (2)

Comments:
(CCLRP0974) T-160
• 6-16, Table 6-5 -- Fourth Street 2006 ADT does not appear to be correct. If it is correct, compare it to the 2005 and 2007 values to determine if this low volume count is unusual.

(CCLRP0974) T-168
• The SDEIS is silent on bikes on the transit mall. Address current and proposed conditions for bikes on the mall

Response T-076. The CCPO is working in partnership with the U of M and other project partners and stakeholders to develop a preferred concept for the U of M Transit Mall. This concept includes a preferred strategy for allowing bicycle access onto the Mall. See Chapter 6 of the FEIS for further details.

Section: 6.2 - Traffic Concerns

Issue Summary Ge-012. Cumulative traffic effects (1)

Comments:
(CCLRP0983) Ge-14
One of the biggest projected concentrations of traffic is at University Avenue and 4th St projected to increase at least 50% when the Mall is closed to traffic. This impact may be significantly underestimated as the cumulative effects of other projects and the indirect effects of this project may not have been included.

Response Ge-012. Indirect and cumulative effects were included in the traffic analysis. Traffic impacts are discussed in Chapter 6 of the FEIS. Indirect and cumulative impacts are discussed in Chapter 9 of the FEIS.
Issue Summary Pp-041. Impact and mitigation in regard to U of M campus area street traffic (1)

Comments:
(CCLRP0969) Pp-38
Traffic Mitigations All general purpose traffic is being rerouted through campus as a result of putting the LRT at-grade on Washington Avenue. The SDEIS does not address all of the specific improvements required to accommodate the increased traffic. Roads within campus will need to be reconfigured and new connections constructed. The University will work with the project partners to put together an acceptable street traffic improvement plan to mitigate the traffic rerouting, as specified in the Memorandum of Understanding.

Response Pp-041. A significant amount of mitigation measures are being planned for the University of Minnesota area. These measures, as well as impacts to traffic, are detailed in Chapter 6 of the FEIS.

Issue Summary T-025. Concerns about traffic impact (8)

Comments:
(CCLRP0983) T-063
• The impact of traffic being drawn to the area to get to stations and the LRT (park-n-hide). University students, administration, and others park and take the bus.

(CCLRP0983) T-066
2.5. Raymond Avenue
• The effect of traffic increase on this N-S connector. The neighborhood requests close coordination regarding a Raymond Ave. traffic calming study and related development of mitigation measures.

(CCLRP0974) T-089
2-39 (Transportation Effects) - Number of intersections at LOS E & F goes down this seems to contradict initial traffic studies surrounding Washington Ave transit pedestrian mall; similar table on 10-3. Clarify in this Table the effects to in corridor and out of corridor intersections.

(CCLRP0974) T-100
• 6-19, This discussion states that traffic conditions on Washington would improve. What is the basis for this conclusion and which alternative is this in comparison to? With one lane of traffic and no turn lanes from Oak to either Walnut or Harvard, and the prohibition of EB left turns along Washington from Oak to University the delays to traffic could be long and unpredictable. A more detailed description of these impacts is needed.
6-19 (University of Minnesota Alignment) - It seems strange to say the transit/pedestrian mall will improve traffic on Washington. It will by eliminating auto traffic, but traffic at the intersections on side streets will likely not improve, as much of the traffic will not be eliminated but merely transferred to nearby streets.

Last paragraph in Section 6-20 (page 6-18) discusses access to Washington Ave Bridge from Pleasant Street but fails to discuss the level of traffic impact on pedestrian circulation across Pleasant Street that may be expected to occur as a result of this change.

Similar to our comments in the DEIS review letter dated June 6, 2006, under Traffic Data/Operational Assessment, Appendix 9.8, we note that the Hiawatha LRT resulted in substantial vehicle traffic delays on Hiawatha Avenue. It would appear that the Central Corridor LRT at-grade crossings will likely significantly increase traffic congestion in this corridor, similar to Hiawatha Avenue. How can what we have learned from the Hiawatha experience improve the intersection level of service for the Central Corridor LRT?

A lane of automobile traffic will be lost on Cedar street, resulting in congestion, particularly around the World Trade Center Ramp and other ramps

Response T-025. Traffic impacts are discussed in Chapter 6 of the FEIS. Coordination with the cities, counties, the U of M, and MnDOT has been ongoing since the beginning of Preliminary Engineering regarding traffic issues and impacts as “lessons learned” from Hiawatha LRT.

Issue Summary T-031. Impact on traffic congestion (1)

Comments:
(CCLRP0993) T-084
If Washington Avenue bridge is closed that will simply mean more traffic and more pollution for our neighborhood. Little if any funding for traffic mitigation is available for the significant diversion of traffic to the University Avenue S E and 4th Street S E corridor, as a result of the closing of Washington Avenue S. E., from the Central Corridor project or any other responsible City, County entity or the State of Minnesota.

Response T-031. A significant amount of mitigation measures are being planned for the University of Minnesota area. See Section 6.2 of the FEIS for further details. Air quality is discussed in Section 4.5 of the FEIS.
Issue Summary T-032. Impact and design of traffic structures (Signals, etc) (1)

Comments:
(CCLRP0986) T-085
Preserve traffic signal at Exchange and Cedar St

Response T-032. The signal at Exchange and Cedar St in downtown St. Paul will be removed and a pedestrian signal will be installed to maintain existing patterns of pedestrian access.

Issue Summary T-036. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0974) T-090
• 6-18 Indicate what the confidence level is for the data from the traffic studies (high medium- low) based on available data and limitations on various methodology (ex: were pedestrians accounted for? The regional model is unconstrained) Describe what work remains to be done.

Response T-036. Traffic study data is not reported in terms of confidence level as tools used to analyze future traffic conditions are not based on statistical method. A summary of all traffic studies conducted, including a discussion of traffic studies accounting for pedestrian movements is included in Chapter 6 of the FEIS.

Issue Summary T-037. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0974) T-091
• 6-19, 1st and subsequent paragraphs: The project is projected to open in 2014. The SDEIS traffic forecast modeling was changed from 2020 to 2030. The typical EIS approach for traffic impacts is to look at 2 forecast scenarios to understand both short AND long-term impacts. The first "short-term" scenario is usually set at 1 year after opening or in this case is 2015. The second "long-term" scenario is to match an approximate 20-year horizon and thus the regional 2030 forecast is most appropriate. Why was there not a 2015 traffic forecast accomplished to understand the "short-term" impacts?

Response T-037. It is common for traffic impact analyses to include the project opening year and a future analysis year, often 10-20 years later. Using a 2014 traffic forecast (opening year) provides sufficient data in determining short-term impacts.

Issue Summary T-038. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0974) T-092
• 6-19, 1st and subsequent paragraphs - The 2030 forecast modeling does not account- for the correct roadway network that will be in-place in 2015 let alone 2030. The City of
Minneapolis has numerous federally funded Non-motorized Transportation Pilot (NTP) Projects that are not included in the planned network. The following projects are within the CCLRT traffic study area and expected to be completed in 2008 and 2009:

- 10th Avenue SE (Como Ave SE to Univ Ave SE) converted from 4 lanes to 3 lanes with bike lanes
- 19th Avenue S (Univ Ave SE across the 10th Ave river bridge to Riverside Ave) converted from 4 lanes to 3 lanes with bike lanes, also includes a portion of 19th Ave S south of Riverside Ave
- 27th Avenue SE (Univ Ave SE to E River Pkwy) most portions converted from 4 lanes to 3 lanes with bike lanes. o Franklin Avenue E (from Riverside Ave east/northeast across the Franklin Ave river bridge to E River Pkwy) converts 4 lanes to 3 lanes with bike lanes
- 20th/Minnehaha Avenues S (Riverside Ave to 26th Ave S) converted from 4 lanes to 3 lanes with bike lanes
- Riverside Avenue (Cedar to Franklin Ave) converted from 4 lanes to 3 lanes with bike lanes, also includes portions of 4th St S and 15th Ave S westerly of Cedar. These projects should be included in both the 2015 and 2030 modeled forecasts and a reassessment of the 48 intersections should be accomplished appropriately.

**Response T-038.** The traffic analyses and results discussed in Chapter 6 of the FEIS were updated and have incorporated many of the roadway changes taking place in Minneapolis.

**Issue Summary T-039.** Need improved traffic analysis and discussion (2)

**Comments:**
(CCLRP0974) T-093
- 6-19, 1st and subsequent paragraphs - This text states that only 4 intersections in 2030 are impacted by the project because the 2030 no-build scenario has 6 other intersections that will have reached LOS F. By only selecting to examine the 2030 scenario and not the 2015 "short-term" scenario, the project could be causing other impacts that are being masked by the 2030 background traffic growth

(CCLRP0964) T-120
Page 6-5 - Average auto occupancy of 1.2 seems high.

**Response T-039.** Comment Noted.

**Issue Summary T-040.** Need improved traffic analysis and discussion (1)

**Comments:**
(CCLRP0974) T-094
- 6-19, The amount of delay is likely to increase at the 6 intersections identified, but was not fully analyzed. Also, the unacceptable LOS conditions will likely occur sooner with the implementation of the Central Corridor LRT project than they would have otherwise. There are grades of LOS F and it frequently happens where one leg of an intersection operates with large delay, with minor volumes and the major approach operates at a higher level of service.
and the total for the intersection is a LOS higher than F. How is amount of delay and delay on individual intersection legs addressed?

Response T-040. The 6 intersections identified as having poor overall levels of service under the 2030 No Build and 2030 LRT w/ ped mall scenarios also have more than one leg with higher levels of delay (although typically not failing). For these intersections, it is difficult to "balance" the delays across the legs and they do experience delay levels over 100 seconds (with some in the 200+ range). When the overall delay reaches an extremely high level, accuracy is lost and it is not effective to compare the LOS results for the No Build and LRT scenarios. Therefore, the overall No Build and LRT PM peak hour volumes were used to compare the percentage increase between the alternatives. The differences between the No Build and LRT were under 10%. It was determined that the small relative percentage difference showed that the LRT w/ ped mall alternative does not significantly degrade operations.

Issue Summary T-041. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0974) T-095
- 6-19, bulleted intersections - 2nd bullet -- Is this the Cedar - Wash 15th Ave intersection?
- Last bullet - Do you mean 4th St SE/10th Ave SE?

Response T-041. These intersections mentioned in this section have been corrected as noted.

Issue Summary T-042. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0974) T-096
- 6-19 A much more detailed description of the affects to the traffic and travel patterns that result from the closure of Washington is needed. Including, but not limited to, the anticipated traffic volume increases on the roadway segments and freeways within the study area. The current section only talks about intersection operations everywhere except on the River Road.

Response T-042. A comparison of the estimated 2030 ADT (and PM peak hour volumes) was evaluated as part of Traffic Study #3 (U of M regional area study). The data was presented in a table called "2030 Travel Demand Model Volumes Summary" and included 2030 Base data and 2030 LRT with Ped/Transit Mall. See Chapter 6 of the FEIS for further details.

Issue Summary T-043. Need improved traffic analysis and discussion (3)

Comments:
(CCLRP0974) T-097
- 6-19, The operation of Harvard from the ERR to Washington will be dramatically changed by the addition of substantial traffic volumes. The conflict between heavy pedestrian traffic and much heavier vehicular traffic will be difficult to manage in a safe and efficient manner.
How will this be mitigated?

(CCLRP0974) T-099
• 6-19, The capacity of Washington from Huron to Walnut will be dramatically reduced. It will be one lane with no turn lanes, including the prohibition of EB left turns from Oak to University. How will the project address this?

(CCLRP0974) T-102
• 6-19 The transit mall has no "natural" detour route. A detour traffic management plan should be developed to understand how buses, emergency vehicles, bikes and pedestrians will move when Washington is closed for maintenance, construction or emergencies.

Response T-043. A significant amount of mitigation measures are being planned for the University of Minnesota area. See Chapter 6 of the FEIS for further details.

Issue Summary T-044. Need improved traffic analysis and discussion (2)

Comments:
(CCLRP0974) T-098
• 6-19, last paragraph - While the conversion may improve traffic flow operations, local access and circulation will be reduced. Also, this paragraph is confusing because the conclusion is stated before the fact statements.

(CCLRP0974) T-103
• 6-20, The delays mentioned in Table 6-8 appear not to include train clearance interval, which could be as long as 45 seconds in which no vehicles can move. The impacts to the fire station and response time are not mentioned.

Response T-044. The delays are representative of the average delay times and include train clearance delay. Safety and security is discussed in Section 3.7 of the FEIS

Issue Summary T-045. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0974) T-104
• 6-20, Table 6-8, last row for Church St - Why is there a LOS A, 1.5 sec delay stated for 2030 when this intersection is proposed for pedestrians only and/or provides local driveway access? Were their other assumptions related to public traffic volumes?

Response T-045. A traffic signal will be in place at this intersection, and this LOS represents the delay to the vehicles crossing over Washington Ave at Church Street for local driveway access.
Issue Summary T-046. *Need improved traffic analysis and discussion* (1)

**Comments:**
(CCLRP0974) T-105
6-22, For three-car train operation, what's the definition of minor impact - additional delay? Do we know this to be the case especially in the downtown areas with shorter block lengths and Dual Train operation in Minneapolis? Substantiate the statement about minor impacts to traffic operations for the introduction of three car trains. Traffic modeling of this situation has not occurred as far as the City is aware.

**Response T-046.** The modeling of three car train operations along Washington Avenue and other places have caused minor delays (a few seconds) to vehicles versus two car operations. A traffic analysis has been performed for Downtown Minneapolis and is reported in Section 6.2 of the FEIS.

Issue Summary T-047. *Need improved traffic analysis and discussion* (1)

**Comments:**
(CCLRP0974) T-106
No mention of events and the impact on general traffic. Not just Basketball, football and hockey, but Northrop, Radisson, and other "minor events" Add information/analysis on effects on traffic for events to the FEIS. • 6.2.3 Long Term Effects (Traffic) - Include in the traffic analysis for the FEIS a study of the impacts of a complete Granary Road on the traffic network. Implementation of Granary Road may help to alleviate some of the mitigation components resulting from the Washington Avenue Transit Mall.

**Response T-047.** Given the number of event venues and the frequency of events, there are generally one or more events each day. Since traffic counts have been performed for multiple days, it is likely some events are represented in the data collected. The FEIS does not include a study of a complete Granary Road since funding for a complete Granary road has not been secured.

Issue Summary T-048. *Need improved traffic analysis and discussion* (1)

**Comments:**
(CCLRP0999) T-107
Additionally, the intersection itself should not be the sole focus of problem-solving for traffic. Alternative solutions should be sought over a broader geographic area, such as adding or completing additional north-south road and bus connections to Roseville and Highland Park or improving other east-west routes to accommodate through traffic. On University Avenue, especially in the Midway area, UPDC recommends that non-signalized pedestrian crossings be provided at every intersection that does not have a traffic light. In the Snelling/University station area, an additional non-signalized pedestrian crossing is needed at Asbury Street for pedestrians crossing University Avenue to get to the Midway shopping center.
Response T-048. Additional north-south bus connections are being planned. See Section 6.1 for further details. The Preferred Alternative does not include an unsignalized pedestrian crossing at Asbury. Crossing are available at Snelling Ave and Simpson St.

Issue Summary T-050. Further traffic analysis and mitigation measures are needed (3)

Comments:
(CCLRP0969) T-109
There is not sufficient information as to where these 20,000 - 25,000 vehicles using Washington Avenue each day will divert. Will they cross the Mississippi River in other locations, or will they continue to use the Washington Avenue Bridge and divert to other campus streets? What will be the impacts to pedestrians and bicyclists as well as to the intersection capacity? Specifically what improvements are referred to on page 6-20 (e.g. left-turn lanes) and how might these improvements affect other campus resources? How will these diversions affect wayfinding and access to University facilities?

(CCLRP0969) T-111
The University requests additional details on the "potential strategies" to improve operations at the intersections identified as experiencing unacceptable levels of service.

(CCLRP0969) T-113
University of Minnesota Alignment - The University has significant concerns regarding the diversion of traffic from Washington Avenue onto other campus area streets. Many of these streets are smaller, two-lane roadways accommodating many pedestrians, bicycles, and small motorized vehicles (e.g. scooters), and vehicular traffic. Even smaller increases in vehicular traffic, within the "capacity" of the roadway, may conflict with other roadway functions and the overall campus quality.

Response T-050. A significant amount of mitigation measures are being planned for the University of Minnesota area. These measures, as well as impacts to traffic, are detailed in Chapter 6 of the FEIS.

Issue Summary T-051. Timing of traffic mitigation measures (1)

Comments:
(CCLRP0969) T-110
Mitigation - All traffic mitigations must be completed prior to the closure of Washington Avenue for LRT construction/operation.

Response T-051. As stated in the Memorandum of Understanding between the Metropolitan Council, the University of Minnesota, the City of Minneapolis, the Hennepin County Regional Rail Authority, and Hennepin county, the parties have agreed "to cooperatively work together to explore alternatives and resolve outstanding Project related matters including: mitigation impacts, design issues, construction issues, and operation matters;"

Issue Summary T-053. Need improved traffic analysis and discussion (1)
Comments:
(CCLRP0969) T-114
The following should be examined as possible "distressed" intersections: University and Pleasant; 4th Street SE and 15th; Church/17th & University; Fulton & Huron.

Response T-053. According to the traffic studies performed for this area, these intersections are not expected to operate at level of service E or F, and thus will not be noted as "distressed" intersections.

Issue Summary T-055. Concerns about traffic signal preemption and impacts to vehicular traffic and LRT travel time (2)

Comments:
(CCLRP0964) T-116
Due to our experience at signalized intersection operations on Hiawatha and 34th Avenue after the construction of the Hiawatha LRT, the Central Corridor LRT should not preempt the traffic signal at Snelling and University. Signal preemption would cause severe impacts to vehicular traffic operation that cannot be mitigated.

(CCLRP0972) T-138
I ask that the project consider establishment of a system for preemption of traffic signals, i.e. red lights that delay Light Rail Vehicles so that the train trip in the corridor will be quicker than it might be without signal preemption.

Response T-055. Central Corridor LRT will be given signal priority along the entire alignment. The new signal control systems and track systems will be integrated to provide extended "green" signal times to promote the efficient movement of trains along the corridor, while minimizing disruption to automobile traffic.

Issue Summary T-056. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0964) T-118
Outdated traffic volumes were used in the SDEIS traffic analysis. This issue was also noted in our 2006 comments on the DEIS,

Response T-056. Updated traffic volumes have been incorporated into the FEIS traffic analysis. See Chapter 6 of the FEIS for further details.
Issue Summary T-058. Mitigation of traffic impact (4)

Comments:
(CCLRP0983) T-126
3.3. Level of Service Mitigation - Improvements at intersections that currently experience congestion problems must be part of the plan. Consideration of new street connections that provide alternatives to avoid congested intersections should be considered in the Level of Service mitigation. Roundabouts, bike lanes and accessible crosswalks must be considered in the redesign of intersections. All intersections that experience an unacceptable level of service need a mitigation plan.

(CCLRP0983) T-127
Corridors that are forecasted to receive increased traffic due to the project need mitigation to ensure safe travel for traffic along with pedestrians and bicycles. Traffic calming measures or redesign of the streets with "Complete Street" concepts will be required. The following are potential mitigation alternatives for pedestrian and Bicycle impacts due to the project.
- All corridors that have increased traffic due to the project, such as Franklin and Raymond Avenues, need to have adequate traffic calming.
- A bicycle route along the Washington Avenue Mall should be added.
- Consideration should be given to additional pedestrian bridges over the Washington Avenue Mall

(CCLRP0983) T-128
• University Ave/4th St interchange with I-35W congestion could be reduced by providing new access at Hennepin Avenue at I-35W. The diverted traffic along Hennepin Avenue should also have adequate analysis and mitigation to safely handle the pedestrian, bicycle, transit and increased vehicular traffic.

(CCLRP0983) T-129
• Vehicular traffic on all impacted area streets generated by closing Washington Ave. to vehicles, vehicles accessing to the LRT stations and more circuitous routes take by vehicles.

Response T-058. A number of mitigation measures are being planned. These measures, as well as impacts to traffic, are detailed in Chapter 6 of the FEIS.

Issue Summary T-059. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0983) T-130
The traffic studies performed for the Central Corridor SDEIS have not addressed several neighborhood concerns. The traffic generated and evaluated is underestimated since the cumulative effects of other projects were not specifically included in traffic projections. In addition, the analysis performed was limited to the vehicular operations and did not address the pedestrian and bicyclist safety and operations along the corridor and vicinity. The environmental review needs to identify which actions are included as part of the cumulative effect evaluations, average and peak traffic levels on all area streets and highways with all
past, present, and reasonable foreseeable future actions included, and identify suitable mitigation measures to ensure that traffic impacts will not result in negative impacts to area neighborhoods, area businesses, University students and staff, others driving through the area, as well as pedestrians and bicyclists. The Washington Avenue traffic studies also need to address the impacts from the increased miles driven along the diverted routes.

- The traffic generated by each of the projects is not specifically identified and included in the traffic analysis. Each of these projects contributes to the overall traffic impacts and should be evaluated as part of the cumulative effect evaluation. Even if the traffic for an individual project is limited in duration, is periodic, occurs in an area that already has a failing level of service, and as a result was not included in the traffic model for the project it must be included in order to address cumulative traffic impacts.

- The SDEIS needs to address the specific changes in traffic volumes (average and peak) on all potentially affected area streets, changes in traffic patterns, cut-through traffic, and increases in miles driven due to more circuitous routes. The reference to traffic moving over to West River Road and the road having sufficient capacity to handle it does not identify specific, quantitative impacts to West River Road and other area streets that will experience significant increases in traffic volume and changes in traffic patterns.

Response T-059. Multiple traffic studies were conducted of Central Corridor LRT operations. Traffic studies are summarized in Section 6.2 of the FEIS. Pedestrian movements were accounted for when conducting an analysis of LRT operations. In addition, future traffic volumes used to predict 2030 traffic operations did account for future actions as part of using the Metropolitan Council's Regional Model, which accounts for future development and planned and programmed transportation projects.

Issue Summary T-060. Mitigation of traffic impact (1)

Comments:
(CCLRP0983) T-131
Closing this segment of Washington Avenue will have significant impacts on adjacent neighborhoods. Streets that are connected to river crossings and freeway ramps (e.g. Franklin Avenue, Riverside Avenue, University Avenue and Fourth Street) will see significant increases in traffic volumes and more intersections will operate at LOS F or lower. The SDEIS proposes mitigation for the most severely impacted intersections, but proposes no mitigation to address neighborhood concerns about the diminished livability of neighborhood streets for residents and businesses, pedestrians, and bicyclists.

Response T-060. A significant amount of mitigation measures are being planned for the University of Minnesota area. These measures, as well as impacts to traffic, are detailed in Chapter 6 of the FEIS. Community cohesion and neighborhood livability issues are address in Section 3.2 FEIS.
Issue Summary T-061. Mitigation of traffic impact (2)

Comments:
(CCLRP0983) T-132
• The intersection of East River Road/Franklin/27th could be redesigned with a roundabout along with an underpass for the East River Road traffic.

(CCLRP0974) T-170
• 6-23 Mitigation - Diversion impacts are not discussed in enough detail to guide decision-making. Adding turn lanes to improve operation is too broad a statement. Generally to obtain a turn lane, either the roadway must be widened - loss of sidewalk area; or removal of parking - difficult in commercial districts.

Response T-061. Roadway and traffic mitigation commitments for the Central Corridor LRT Project are discussed in chapters 6 of the FEIS.

Issue Summary T-062. Mitigation of traffic impact (1)

Comments:
(CCLRP0983) T-133
• Access to I-35W at both Washington and University/4th Street needs to have adequate mitigation to address the regional mobility along with community mobility from a pedestrian, bicyclist and local motorist perspective.

Response T-062. The Central Corridor LRT project is not expected to negatively impact access to I-35W from both Washington and University/4th Street, thus no mitigation is required. The West Bank station area and I-35W access ramps will be modified in response to comments received on the SDEIS. See Chapter 6 of the FEIS for further details.

Issue Summary T-064. Need improved traffic analysis and discussion (1)

Comments:
(CCLRP0996) T-136
While Met Council traffic engineers report that eliminating one traffic lane in each direction would result in failing levels of service (LOS) for motorized vehicles at key intersections, we question the accuracy of the assumptions used in their calculations.

Response T-064. Comment noted. All forecast traffic volumes used as part of analysis of future LRT operations were generated by the Metropolitan Council's regional model, which is approved by the FHWA and FTA. Calculations of future levels of service resulting from all Central Corridor LRT traffic studies were made using accepted traffic engineering methodology.
Issue Summary T-067. Mitigation of traffic impact (1)

Comments:
(CCLRP0980) T-141
Some potential mitigation strategies on the part of the Metropolitan Council follow:
• The inclusion of LRT stations at Western, Victoria, and Hamline Aves.
• The retention of Route 16 bus service at existing levels.

Response T-067. The Metropolitan Council evaluated future infill stations at Hamline Avenue, Western Avenue, and Victoria Street. As described in Section 3.8 of the FEIS, the underlying infrastructure would be constructed in order for these stations to be built as ridership merits without disrupting operation of the Central Corridor LRT. While the frequency of scheduled service for the Route 16 would be reduced, the introduction of LRT service running at 7.5 minutes during the peak hour periods and the additions of re-routed bus routes and new circular bus routes (Route 60 and Route 83) help to improve end-to-end run times along the corridor. An enhanced discussion of impacts to transit-dependent populations and impacts to environmental justice communities is included in Section 3.8 of the FEIS.

Issue Summary T-075. Concerned that traffic-generating events be considered in analysis, and concerns on emergency vehicle access (3)

Comments:
(CCLRP0974) T-158
No mention of events and the impact on general traffic. Not just Basketball, football and hockey, but Northrop, Radisson, and other "minor events" Add information/analysis on effects on traffic for events to the FEIS.

(CCLRP0974) T-159
No mention of events and the impact on general traffic. Not just Basketball, football and hockey, but Northrop, Radisson, and other "minor events" Add information/analysis on effects on traffic for events to the FEIS.

(CCLRP0974) T-167
6-18, Describe in more detail how the emergency vehicle access would be maintained.

Response T-075. Given the number of event venues and the frequency of events in the area, there are generally one or more events each day. Since traffic counts have been performed for multiple days, it is likely some events are represented in the data collected.
Issue Summary T-077. **Need improved traffic analysis and discussion, and analysis/clarifications of impacts to Washington Avenue bridge** (2)

**Comments:**
(CCLRP0974) T-161
• 6-16, last paragraph, last sentence -- The conclusion about 2030 volumes being less than 2020 volumes has no correlation to the existing 2001 or the 2006 volumes. Thus the consistency statement is without supporting facts.

(CCLRP0974) T-169
• 6-22, The Washington Ave bridge roadway widths have not been resolved. The proposal to have a 16 ft traffic lane does not adequately address the operation with a breakdown or closure of the one moving lane. Especially if the lane has a barrier on both sides.

**Response T-077.** The barrier in place on the Washington Avenue Bridge is required as part of safety precautions, separating vehicular traffic from Central Corridor LRT tracks. Rather than running on embedded tracks on the bridge, the LRT will be operating on direct fixation tracks which extend above the pavement surface and which vehicles cannot safely cross or encounter. Strategies to maximize the width of the vehicular lane on the Washington Avenue Bridge thereby providing the width required to bypass stalled vehicles are being explored with the City of Minneapolis, Hennepin County and the University of Minnesota. Any potential changes will be documented in the advanced preliminary engineering plans developed by the CCPO and will be shared with stakeholders.

Issue Summary T-078. **Need improved traffic analysis and discussion** (2)

**Comments:**
(CCLRP0974) T-162
• 6-17, Table 6-6 -- The 2030 volume across the Washington Ave Bridge keeps changing. The 2030 build forecast traffic volume has and still is being quoted by the CCPO as about 14,000 now it is 15,100.

(CCLRP0974) T-163
• 6-17 Table 6-6 AADT for segment of Washington proposed to be closed is critical information to disclose. Fill in values where the table says Not Available.

**Response T-078.** Comment noted. Updated traffic volumes are shown in Section 6.2 of the FEIS.

Issue Summary T-093. **Impact on traffic congestion** (1)

**Comments:**
(CCLRP0985) T-192
The Broadway option also adds several more blocks of on-street LRT trackage, resulting in diminished access for other modes of transportation.
Response T-093. The Broadway option has been dropped from consideration, however, the tracks are being extended to Broadway to carry non-revenue service trains. See Section 2.2 of the FEIS for a description of the Preferred Alternative.

Issue Summary T-098. Mitigation of traffic impact (1)

Comments:
(CCLRP0983) T-125
In addition, suitable mitigation measures were not identified. The traffic studies do not identify mitigation to intersections that currently experience congestion problems and the SDEIS states, "The Metropolitan Council is evaluating a number of potential strategies to improve operations at intersections operating at a deficient LOS". Improvements to these intersections need to be identified and incorporated into the traffic analysis.

Response T-098. A complete analysis of the impacts of LRT at intersections along the corridor has been completed and is discussed in Section 6.2 of the FEIS. Mitigation committed to address impacts related to LRT operations is also discussed in Chapter 6 of the FEIS.

Section: 6.3 - Effects on Other Transportation Facilities and Services

Issue Summary T-088. Update noted report figures and text (1)

Comments:
(CCLRP0964) T-185
Some SDEIS maps (e.g., figures S-I, S-2, and others) do not show the new Downtown Minneapolis Ballpark Station. It is difficult to locate the five stations shared with the Hiawatha LRT when only four are shown on the maps. [Figure 2I does show the Downtown Minneapolis Ballpark Station.

Response T-088. The figures were changed to reflect this comment.

Section: 6.3 - Bike & Pedestrian Concerns

Issue Summary Bp-001. Further description of bicycle and pedestrian facilities needed (7)

Comments:
(CCLRP0969) Bp-02
Specific short-and long-term effects (including construction-related effects) to the bike/pedestrian facilities on the U of M campus should be explained in greater detail.
University of Minnesota Alignment
Bikes should be recognized as a possible mode accommodated on the Washington Ave Mall. In addition, examples of how the mall will improve the connectivity of activities within the East Bank campus would be helpful.

Bikes should be recognized as a possible mode accommodated on the Washington Ave Mall.

Safely integrating pedestrians and bicycles into the at-grade LRT alignment through the University of Minnesota will be crucial for the successful operation of the LRT. Removing vehicles from that portion of Washington Avenue will help mitigate some conflicts; however providing loading areas for pedestrians and bicyclists while at the same time keeping them away from moving trains will take considerable planning and education.

Limited space may cause cyclists to use sidewalk when it is not appropriate to do so. Consider providing alternative routes to University Avenue, and connections to CCLRT corridor from these alternative routes especially for bike commuters who need a fast, seamless trip. The project should allow for a seamless route from U of M transit mall to Washington Ave. Bridge to downtown Minneapolis.

• The SDEIS outlines the long-term effects of the project on Bicycling (6.3.3.4, p 6-30). The report discusses bicycle crossings in relationship to paving and track heights. The City, however, has done a good deal of planning for bicycles in the Corridor, and could be referenced in the document. That planning is reflected in the text on p 6-25

Bicycle access should be enhanced in the LRT corridor ? improved parallel and perpendicular bicycle access should be a priority. Bicycle parking should be added along the corridor. The City has received a federal grant through Bike/Walk Twin Cities, a program administered by Transit for Livable Communities, to evaluate ways to improve bicycle and pedestrian access. The SDEIS should reference the bicycle and pedestrian mode shares for St. Paul and Minneapolis specifically which are much higher than the mode shares for the region as a whole.

Response Bp-001. A description of bicycle and pedestrian facilities, area plans, and impacts to these facilities as they pertain to the Central Corridor LRT project is provided in the FEIS.
Issue Summary Bp-002. Comments and ideas in regard to bicycle and pedestrian facilities (4)

Comments:
(CCLRP0964) Bp-07
NOTE: The accommodations for bicycle and pedestrians users should not always be described together. Bicycles are legally vehicles and must follow laws that pertain to motorized vehicles.

(CCLRP0983) Bp-09
• Consider developing bike route on Mall.

(CCLRP0983) Bp-18
• The DCC supports the consolidation of the 4th and 6th Street stations into one central station that can also become a hub for multi-modal transfers. This alignment does remove a critical link in the skyway network through downtown Saint Paul. The skyway network supports the convention and hospitality industry and augments movement through the downtown. The FEIS should document how this adverse impact on pedestrian circulation in the downtown will be mitigated.

(CCLRP0983) Bp-19
• Evaluate the need for additional pedestrian overpasses.

Response Bp-002. Comment noted. A description of bicycle and pedestrian facilities, area plans, and impacts to these facilities as they pertain to the Central Corridor LRT project is provided in the FEIS. The current concept for the Transit/Pedestrian mall has accommodations for bicycles. Impacts and mitigation to the skyway system are discussed in Chapter 3 and Chapter 6 of the FEIS.

Issue Summary Bp-003. Impact to bicyclists (1)

Comments:
(CCLRP0974) Bp-01
• 6-24, Section 6.3.1.2 - note the above page 6-19 comments related to the NTP bike projects. Will the CCLRT project remove any of these bike projects? If so, where will the comparable bike facilities be relocated?

• 6-26, 6.3.2.2 Existing Bicycle Environment – Downtown Minneapolis – Identifies Marquette and 2nd Avenues as having dedicated bicycle lanes, this will not be true after implementation of the Access Minneapolis/UPA recommendation.

Response Bp-003. Construction of the Central Corridor LRT project is not anticipated to adversely impact planned bicycle facilities in the study area. The current bicycle and pedestrian path crossing Instate 35W between the Cedar-Riverside Hiawatha LRT Station and the Downtown East/Metrodome LRT Station will be detoured during part of the
construction. A description of bicycle and pedestrian facilities, area plans, and impacts to these facilities as they pertain to the Central Corridor LRT project is provided in the FEIS.

**Issue Summary Bp-007. Impact to bike/pedestrian facilities (1)**

**Comments:**
(CCLRP0983) Bp-15  
• The effect on pedestrian and bicycle routes, access, and bicycle parking.

**Response Bp-007.** Impacts to pedestrians and bicycles are discussed in Section 6.3 of the FEIS.

**Issue Summary Bp-008. Impact to bike/pedestrian facilities (1)**

**Comments:**
(CCLRP0983) Bp-16  
The studies related to diverting traffic from Washington Avenue only address the operational characteristics of the traffic flow. The impact that the increased traffic volumes, loss of the Mall, and street modifications have on bus service and bicycle or pedestrian movements along these routes needs to be addressed. The SDEIS needs to address:
• Pedestrian and bicycle access to bus stops, crossing University, Franklin and other streets that will be experiencing higher traffic levels.
• The cumulative impact on sidewalks, bicycle routes, the generation of new crossing needs, and methods of dealing with new and existing access and crossing needs.

**Response Bp-008.** Impacts to the transit system are discussed in Section 6.1 of the FEIS. Impacts to pedestrians and bicycles are discussed in Section 6.3 of the FEIS.

**Issue Summary Ci-002. Impacts on St. Paul pedestrian skyway (1)**

**Comments:**
(CCLRP0952) Ci-02  
Construction impacts on current skyway connections in the Athletic Club block must be included in the mitigation text, as well as a plan for mitigating such disruption, either through a temporary structure to support the existing connection, or construction of a temporary, heated skyway connection.

**Response Ci-002.** The skyway connection in the Athletic Club block will be removed and replaced with a temporary skyway during construction. See Section 3.2 and Section 6.4 of the FEIS for further details.

**Issue Summary Ge-003. Improve pedestrian environment (1)**

**Comments:**
(CCLRP0944) Ge-03  
This is not the time to weaken the pedestrian environment. This is actually the time to
strength it because if we're going to get the full utilization of this light rail line, we do need to have a very, very enhanced pedestrian environment.

**Response Ge-003.** The current configuration along most of the corridor presents a barrier to pedestrian movements. The project includes clearly defined pedestrian crossings, landscaping, and other amenities that will enhance the overall pedestrian experience along the corridor.

**Issue Summary Saf-016.** Pedestrians and bicyclists must be included in traffic analysis and design (1)

**Comments:**
(CCLRP0993) Saf-12
We want it understood that traffic is not just vehicles-or if it is-then pedestrians and bikers need to be protected from vehicular traffic. We desperately need a pedestrian and bike overpass on University Avenue where it intersects with the 35W exit and entrance ramps.

**Response Saf-016.** Construction of the LRT will improve the existing pedestrian and bicycle infrastructure along University Avenue, and improve the safety of pedestrians and bicyclists through implemented design guidelines. The current configuration of University Avenue poses a barrier to pedestrian travel within the corridor. As discussed in FEIS Section 6.3 "Other Transportation Impacts," all pedestrian crossings will be designed in accordance with current design standards and ADA requirements to ensure access and mobility for all.

**Issue Summary T-005.** Impact to and design of pedestrian crossings (1)

**Comments:**
(CCLRP0945) T-012
The second recommendation that we are making for your recommendation is the removal of some of the non-signaled pedestrian crossings that are called for in the plan. Many of our neighbors were unaware until just recently that the new design is looking at signaled crossing intersections every two blocks in our neighborhood, rather than the original version of the draft environmental impact statement when the engineering looking at quarter mile or longer between the ability to cross the street. While we certainly would like to be able to cross the street at every single block, and I personally as someone who crosses that street frequently, would like that ability, we know that there are trade-offs to be made here. We strongly urge that the tradeoff is we have to walk a full block to get a signalled crossing versus the elimination and possible economic decimation of our neighborhood, then I think we'll walk the extra block.

**Response T-005.** The Preferred Alternative includes signalized pedestrian crossing approximately every two blocks, which is approximately 1/4 mile. Unsignalized pedestrian crossings will be installed at nearly every block. See Section 6.3 of the FEIS for further details.
Issue Summary T-006. Concerns about impact to pedestrian street-crossings and concerns that LRT will be a barrier negatively impacting community cohesion/connectivity (2)

Comments:
(CCLRP1006) T-016
we often times, my neighbors and I often time walk over to the stores and there's a lot of concern from people about what's it going to be like? Because right now it's already difficult to cross University Avenue, and with the light rail coming through and with all the stops that there are there, there's a lot of concern around how are we going to cross University with the light rail there when it's difficult now?

(CCLRP0965) T-022
There has always been a concern by residents and businesses about community access and community building. The sentence "Additionally, various safety treatments and/or landscaping may be installed to hinder pedestrian movement outside of legal crossing areas" says to the community and those who already have a fenced corridor called 1-94 and that is yet another barrier about to be built.

Response T-006. Construction of the LRT will improve the existing pedestrian infrastructure along University Avenue, and improve the safety of pedestrians through implemented design guidelines. The current configuration of University Avenue poses a barrier to pedestrian travel within the corridor. The development of the LRT will channel pedestrian movements to crossing locations at intersecting streets, where curb improvements and pedestrian islands within the street will shield pedestrians from both LRT vehicles and automobile traffic. Crossings will still be available throughout the corridor, at both signalized and non-signalized intersections, and the pedestrian channelization is intended to discourage mid-block crossings and improve pedestrian safety. Landscaping enhancements along the line including trees or public furniture will also help to separate pedestrians from automobile traffic. See Section 6.3 of the FEIS for further details.

Issue Summary T-007. Impact to and design of pedestrian crossings (1)

Comments:
(CCLRP0969) T-017
A circulation and access plan should be developed for on-campus ground floors to direct pedestrians to specific crossings.

Response T-007. Pedestrian crossings will be clearly defined to guide pedestrians to the legal crossing areas. Pedestrian circulation and access from inside the ground floors of campus buildings are the responsibility of the University of Minnesota.
Issue Summary T-013. Impact on pedestrian skyway (1)

Comments:
(CCLRP0985) T-024
Skyway access needs to be maintained between the University Club and Alliance Bank Center, with only the minimal necessary interruption for the reconfiguration of the skyway itself.

Response T-013. Although no certain plans have been developed for mitigating the closure of a skyway connection in downtown St. Paul, the city and the Metropolitan Council have adopted a resolution to determine a solution before final design. Please refer to FEIS Chapter 2 and Chapter 6 for further details.

Issue Summary T-029. Impact and mitigation for pedestrians and bicyclists (1)

Comments:
(CCLRP0983) T-070
• University Ave/4th St from I-35W across campus should be restriped to provide additional traffic lanes at a narrower width. The narrower width will reduce the speeds of the traffic through this high pedestrian and bicyclist area.

Response T-029. Comment noted. There are no plans to re-stripe University Avenue near the U of M campus for the purposes of providing additional through lanes. Some intersections will be re-stripped to provide additional turn-lane capacity. See Section 6.2 of the FEIS for further details.

Issue Summary T-069. Impact on pedestrians (1)

Comments:
(CCLRP0986) T-152
Maintaining or extending current sidewalk length/width.

Response T-069. The Central Corridor LRT project team is committed to maintaining a 10 foot minimum sidewalk width in the City of St. Paul along the vast majority of the corridor. There are a few areas were current sidewalk widths are less than 10 feet, particularly in downtown St. Paul, which may not be widened to 10 feet.

Issue Summary T-090. Impact to and design of pedestrian crossings (1)

Comments:
(CCLRP0964) T-188
The current existing raised median in the middle of University Avenue serves as a pedestrian refuge and sidewalk. With the median eliminated, some people may have difficulty crossing.

Response T-090. Impacts to pedestrians are discussed in Section 6.3 of the FEIS.
Issue Summary T-095. Concerns about the pedestrian environment (1)

Comments:
(CCLRP0999) T-195
UPDC thinks it is critical to reexamine the plans for mid-street sidewalks, where pedestrians are forced to walk on a 10-foot wide walkway between passing light rail trains and auto traffic. Consideration should be given to providing direct crossings at both ends of each station platform. The goal should be to ensure safe and comfortable access to station platforms for everyone, including people in wheelchairs and mothers or fathers with children in strollers.

Response T-095. Pedestrian amenities are discussed in Chapter 3 and Chapter 6 of the FEIS.

Issue Summary T-096. Impact and mitigation for pedestrians and bicyclists (1)

Comments:
(CCLRP0966) T-196
A pedestrian/bike bridge or pedestrian/bike tunnel should be designed above or below Snelling Avenue and University Avenue as part of the development plans.

Response T-096. A pedestrian/bike bridge or tunnel in the Snelling Ave/University Ave area is not planned as a part of the Central Corridor LRT project. MnDOT is expected to conduct a traffic and access study for the Snelling and University area in 2009.

Section: 6.3 - Parking Concerns

Issue Summary A-017. Impact to on-street parking (1)

Comments:
(CCLRP0965) A-26
Consider shifting rails to allow parking on at least one side of University Ave,

Response A-017. The AA/DEIS and SDEIS process examined numerous alignment options detailed in Chapter 2 of both documents. The Preferred Alternative includes an alignment that meets the purpose and need most efficiently and minimizes project impacts. Impacts to parking are discussed in Chapter 6 of the FEIS.

Issue Summary Pp-033. Impact to on-street parking (1)

Comments:
(CCLRP1000) Pp-19
We request that the Met Council and the city of St. Paul initiate a process to determine how to save the maximum number of street parking spaces and to make the design of the light rail project more supportive to local businesses.
Response Pp-033. The Metropolitan Council and City of St. Paul created the Parking Solutions Team to identify solutions for addressing the loss of on-street parking on University Ave. The information gathered via the business surveys and business outreach activities is being used to inform the development of block level solutions. The City of St. Paul created a one-page summary outlining potential solutions. The outreach staff continue to work with the businesses to identify specific concerns and develop solutions such as sharing parking with adjacent property owners.

Issue Summary Pp-059. Impact to on-street parking (2)

Comments:
(CCLRP1001) Pp-39
We need assurances from the City that its goal is to keep as much street parking as possible in the short term, and in the long term keep/restore street parking when circumstances allow the removal of a lane of traffic. The city should pro-actively work to lessen driving trips on University Avenue, without unduly impacting commerce, with a variety of travel-demand management strategies, and by exploring the diversion of non-local traffic to alternative streets. The upcoming construction of LRT and the anticipated excavation of the street offer an opportunity to simultaneously incorporate a number of technological and environmental improvements beneath the roadway. A multi-jurisdictional task force should be created to explore and plan for the feasibility of such opportunities.

(CCLRP0988) Pp-43
The Metropolitan Council and the City of Saint Paul must agree on who is responsible for allowing off-peak parking on University Avenue from Lexington to Marion, and that party should make a public commitment to allow one-lane of traffic in each direction.

Response Pp-059. Allowing parking on University Avenue during off-peak hours is not part of the current project definition, as discussed in the FEIS. However, the Central Corridor Project Office analyzed the potential for and impacts of providing on-street parking during off-peak travel times. The City of St. Paul can use the results of this study to implement off-peak on-street parking on University Avenue if it desires. This decision can be made at a later date or after operations; implementation of the project as described in the FEIS would not preclude the City from allowing off-peak parking on University Avenue.

Issue Summary Pp-063.
Concerns about parking impacts and mitigation (3)

Comments:
(CCLRP0988) Pp-26
The Board of Directors of GFCDC calls for the Metropolitan Council and the City of Saint Paul to commit to resolving these parking concerns, including a restoration of some street parking on University Avenue in the eastern section, from Lexington Parkway to Marion.
First, it is essential that the Metropolitan Council work closely with local businesses and property owners to develop a mitigation program to maximize parking on and near University Avenue. This mitigation program must provide support not only for the any loss of parking but also provide mitigation for other difficulties encountered during the construction of the LRT.

Additional studies should be conducted at other major intersections -- Fairview, Snelling, and Lexington to see if park-n-hiding is a problem there as well, and if parking ramps would be needed at one or more of those stops.

Response Pp-063. The Central Corridor Project Office surveyed businesses and conducted an analysis of on-street parking impacts. An inventory of University Avenue parking supply and impacts is summarized in Section 6.3 of the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or underutilized existing parking lots.

Issue Summary T-017. Impact to parking capacity (31)

Comments:
(CCLRP1000) T-028
The University Avenue Business Association is very concerned that the significant increase in the projected loss of street parking will have a negative impact on the small businesses along the corridor. We co-authored the following Op Ed article which appeared in the Pioneer Press, which we would like to enter in to the formal record of comments for the SDEIS. The elimination of street parking hurts small businesses disproportionately because they typically don't have off-street parking and are completely reliant on the few spots in front of their stores. Some have suggested shared off-street parking, but this is not a complete solution, nor is it cheap. Off-street parking requires almost twice as much land as on street, when you factor in need for driveways, lanes and ramps. It takes approximately one acre to accommodate 125 parked cars, and we are slated to lose about 1,000 street parking spots. With land selling for more than $1 million per acre, the replacement costs for land alone could run in excess of $10 million. Who will pay for this? There is also the cost of constructing the parking lots and the challenge of creating management and maintenance agreements. It must be clearly understood that off-street parking lots, while helpful, are not a complete remedy. Studies show there is a measurable decline in retail traffic because customers are less willing to use off-street parking ramps. Our first preference is to keep as much street parking as possible. We need better information on who is driving on University Avenue. Local traffic patronizing businesses on the corridor should be given priority, and perhaps other traffic could be diverted to the freeway frontage roads. This eventually may allow the conversion of a driving lane to street parking. Another option to explore is allowing
street parking to continue except during the afternoon commute. We also should explore the possibility of designating some of the intersecting streets for timed commercial parking

(CCLRP0950) T-029
The comments I'd like to make is people live on the residential streets, like on Sherburne, there's going to be a parking issue. People that are homeowners need to be able to have a no fee parking permit so that if they go to the grocery store or go to a play or something, they don't come home at 10:00 o'clock at night and have to walk five or six blocks from there.

(CCLRP0945) T-030
As you look at the nine or so callouts from the many, many pages of the supplemental draft that is before you, that particular thing didn't get called out separately, but the creation of the three-car stations, the addition to the infill station, some other changes in the proposal have dramatically impacted on what will be left for street parking for University Avenue under the current design. This is something that's a substantial concern to greater frog town communities. Our organization works with the economic and housing opportunities of people in that area, and the reductions that we're talking about here could have a dramatic impact on the economic opportunities, and subsequently on the housing opportunities for people in that area. If we are going to create a thoroughfare in the frog town neighborhoods where no street parking will be allowed, where the opportunity is to go through and not to go to the businesses that support that community, we feel that the economic impact on the area is substantial, drastic and we really urge you to take a look at some alternatives to this. Those four issues that we're calling for your attention on, one is to look at the idea of reducing the through traffic down to one lane during off peak hours and allowing us to do meter parking or other short-term parking in the traffic lane in non peak hours which we're presuming is the afternoon rush hour. We are also asking you specifically to commit financial resources from this project to provide for the remediation of these lost parking spaces.

(CCLRP0988) T-031
The Metropolitan Council must commit financial resources from the Central Corridor Project to provide remediation of lost street parking. Such money could be used for better signage from University Avenue to off-street parking solutions, creation of shared parking resources, purchasing land for new shared parking and other solutions.

(CCLRP0942) T-034
The SDEIS indicates somewhere that, well, you'll find 629 spaces within one block of the University Avenue. I suspect that those 629 spaces are already avidly being used by people trying to shop in the Midway and all along the area.

(CCLRP0974) T-035
• There is no discussion of station impacts on parking in local neighborhoods. There probably will be a need for Critical Parking areas 6-25, Parking will be removed the entire length of Washington Avenue and much of University Avenue with no suggestion of how this might be replaced. There will be no loading and unloading of passengers or freight the entire length of Washington. How will loading be addressed for affected properties?
UPDC believes that additional studies should be done to determine the viability of time specific parking, allowing for on-street parking for most of the day and evening by going to one lane of traffic in each direction, then reverting to two lanes in each direction, with parking prohibited, during peak afternoon hours. UPDC believes that the LRT project must find ways to restore a substantial number of on street parking spaces to ensure the survival of the many small businesses on University Avenue. Mitigation should be provided in the form of shared parking, consolidated parking, metered side street parking, or structured parking, if needed. Since the loss of parking spaces is a direct result of the LRT, some mitigation funding should be included in the project budget for parking replacement.

The other point I want to speak about is the elimination of too many street parking spaces. We are very concerned that this is going to have a very, very negative, serious impact on our area businesses. We're concerned that the issue in looking at this has really only been framed through the lens of impacts on traffic that flows through the community and not on the needs of businesses or the pedestrian environments. The loss of street parking by virtually every conversation I've had by small businesses is a very, very serious matter, and many of them have said that they are literally on the verge of shutting down their business if they can not resolve this issue.

Finally, there is an expense involved, a huge expense involved to find an off street location for a thousand cars. We're looking at potentially $10 million in private land cost. It takes - 125 cars per acre. We're talking about 8 acres. Land values between 1 and 2 million an acre. We're easily talking just in land costs, not to mention construction costs, about $10 million. There clearly needs to be some discussion about who is going to pay for all that. Thank you very much.

Parking Impacts -- Loading (space occupancy data) for on-street parking should be included—not all of the identified spaces are utilized.

When we look at the members of my community that live along that corridor -- seniors, elders, those who have physical restrictions who do not have access to economic advantages of businesses located at Hamline stops, the impact of smaller businesses, what are we going to do about parking -- those concerns have to be addressed. Living on Aurora Avenue, I'm very much aware of how parking will be shifted to the block where I live;

The Met Council must replace all of the roughly 1,000 PUBLIC parking spaces and employ a variety of mitigation efforts included but not limited to building medium and small scale innovative environmental parking accommodations strategically located in the areas of greatest need and dependence especially between St. Paul Downtown and Hamline.
Citations in Document (pages) - 1-22; 3-3 (table 3-1); 3-33; 3-38: 3-54; 6-20-23; 6-26 thru 6-29. The presenting problem(s) - Interestingly your document clearly identifies a pre-existing condition of a shortage of parking. Yet, the SDEIS disregards the finding and instead exacerbates the problem beyond any neighbor, resident, or business's wildest imagination. This flagrant disregard of the need for on-street parking and the almost 100% of loss parking along University Avenue, especially in the lower and moderate income areas, is an affront to the people who are here and tells them they do not matter.

And to pretend the side streets are not being used by residents and businesses right now between Rice and Hamline is short-sighted and further pushes the impact farther into the residential area where many homes have limited parking options (small lots, no garages, etc. and often already share spaces with local businesses).

Met Council has declared they see themselves as facilitators of the talk on parking---but NO FINANCIAL SUPPORT IS GIVEN. THIS IS UNACCEPTABLE AND PARKING MITIGATION $$$ MUST BE A PART OF THE CEI AND THE PROJECT.

Consider eliminating the extra green space and unnecessary concrete to create more opportunities for on street parking,

perhaps all meter revenue should be retained by Ramsey County to procure additional parking and to assure turnover of on street parking spaces,

The City believes that the impact of Three-Car Platforms is understated. According Section 6.3.3.3 and Table 6-10 (pp 6-29 and 30) Three-Car Platforms only result in a loss of 15 to 20 spaces. This appears to be a major undercounting. Once the decision was made for Three-Car Platforms, it became clear that access from only the signalized intersections would be insufficient. The next step was to evaluate the efficacy of mid-block pedestrian crossings to access the non-signalized ends of the platform. But that was deemed unsafe to have pedestrians crossing at unsignalized crosswalks at mid-block. The next step was to extend a walkway from the unsignalized end of the platform to the nearest cross street, where pedestrian crossings would be safer. According to Table 6-10 this accounts for the loss of 230 to 260 parking spaces for a "desirable design element." If this is to suggest the non-signalized crossings are desirable but not necessary, then it denies the safety considerations that went into the decision for such crossings. Nevertheless, the City maintains that the loss of on-street parking is a loss that should be mitigated by the project. The City recommends that the following elements be considered in development of a mitigation program for the loss of on-street parking, whereby, the City and Metropolitan Council staff will work with affected property owners and tenants to maximize parking on and near University Avenue. And that the City and Metropolitan Council staff will work together over the next two
months to estimate costs and apportion them between the City and the project in an equitable manner. The elements include: Elements of this program should include:

1) Management system for on-street parking including installing parking meters on side streets in the station areas;
2) Installing new meters along University Avenue where parking remains;
3) Developing comprehensive signage for all on- and off-street public parking facilities, including time limit parking for one block either side of University Avenue on all secondary cross streets;
4) Developing shared public, off-street parking lots (generally by reuse of existing inefficient off-street parking);
5) Developing corridor-wide permit parking; and
6) Considering off-peak parking on University Avenue.

(CCLRP0952) T-057
• The City recommends that the following elements be considered in development of a mitigation program for the loss of on-street parking, whereby, the City and Metropolitan Council staff will work with affected property owners and tenants to maximize parking on and near University Avenue. And that the City and Metropolitan Council staff will work together over the next two months to estimate costs and apportion them between the City and the project in an equitable manner. The elements include: Elements of this program should include:
   a. Management system for on-street parking including installing parking meters on side streets in the station areas;
   b. Installing new meters along University Avenue where parking remains;
   c. Developing comprehensive signage for all on- and off-street public parking facilities, including time limit parking for one block either side of University Avenue on all secondary cross streets;
   d. Developing shared public, off-street parking lots (generally by reuse of existing inefficient off-street parking);
   e. Developing corridor-wide permit parking; and
   f. Considering off-peak parking on University Avenue.

(CCLRP0983) T-059
The SDEIS needs to address:
• The major reduction in parking spaces (from 1150 to 175) along University Ave. and the related impact on local businesses. These are primarily "fine texture" business where customers stop in, make a purchase, and drive off. Parking needs to be very close, within an easily walkable distance, to the businesses in order for the customers to use them.

(CCLRP0983) T-060
• The potential use of neighborhood parking permits would be disastrous for area businesses. Parking permits are for residents only and would preclude customer parking for area businesses. Who would pay for the permits and the administration of a permit process? The local businesses and communities do not want to bear this cost.
(CCLRP0983) T-061
• Access to parking areas impacted by closing of Washington Avenue (Washington Avenue Ramp) and by changes in traffic patterns.

(CCLRP0983) T-068
• A specific block by block parking plan to provide parking to area businesses (within short walkable distance) and to deal with other parking issues is necessary to develop an effective parking plan. This plan should incorporate "pocket parking" areas, possibly replacing lots or businesses that are, or may become, vacant.

(CCLRP0983) T-071
The DCC shares community and business concern about the severity of on-street parking loss. This loss will threaten the viability of individual businesses and negatively impact residential neighborhoods that are near and, in some cases, on University Avenue. It will also negatively impact the vitality of University Avenue as a whole.

(CCLRP0983) T-072
• Transit rider parking near each station needs to be identified and incorporated into every station area plan. Even though the Metropolitan Council has expressed that they want to discourage this type of parking, in reality it will occur and the neighborhoods will suffer if the parking is not incorporated in the project.

(CCLRP1001) T-077
the removal of street parking impacts pedestrian safety and walkability, and the effects it will have on small businesses. If the loss of street parking is unavoidable, we support a variety of potential mitigation steps. These could include the creation of short term street parking on blocks intersecting University Avenue targeted to retail traffic use, and the development of plans for off-street shared parking for as many blocks as possible. The City needs to reassess its parking regulations and the usage of alleyways to enhance off-street parking options. Creating off-street parking lots will require considerable financial resources estimated to be in excess of $10 million, and we request that the City and Met Council seek to secure that funding.

(CCLRP0990) T-078
Lost of on-street parking must be minimized. On-street parking must be restored in areas where it is needed by small businesses. There must be funding for parking and business mitigation.

(CCLRP0971) T-079
these businesses will lose their on-street parking to LRT. If customers no longer can conveniently park close to these businesses, the customers will go elsewhere, forcing more businesses to go under. After construction completion, their streets will become the parking lots for the suburban commuters who won't (due to rail bias) ride the so-called feeder buses, but will drive in, park their cars, and ride the train. The low-income residents will have to payout of their own pockets the cost to adopt permit parking if they ever hope to park near their houses again.
I share the concern expressed by some people about retaining small businesses on University Avenue. Do we know how many businesses might be affected by a reduction in the amount of free on street parking?

I ask that the Central Corridor Project Office provide estimates of the number of parking spaces that may be lost in the critical areas with the establishment of LRT in the corridor, estimates of the number of off-street parking spaces in the critical areas, estimates of the current rates at which both on-street and off-street parking spaces are being utilized in the critical areas, and estimates of the future rates at which both on-street and off-street parking spaces may be utilized in the critical areas after they have LRT service. Estimation of future demand ought to include an assessment of potential reductions due to the addition of LRT and other alternatives to driving. I ask that the analysis of availability of parking along University Avenue include substantial and serious consideration of the abundant off-street parking in the corridor. Lastly, if the City of Saint Paul wants to add parking capacity along the corridor to replace parking that may be lost due to building LRT on University Avenue, then I think that the city itself or some other entity other than the Central Corridor LRT project should pay for such parking.

And so, clearly, there needs to be some kind of compensation or mitigation for this because it's going to hurt small businesses as well as the community if parking starts to overflow into residential streets. I think it would be best not to choose an alternative, such as a parking permit, which will force the community to pay for a problem caused by a development that many of them don't want.

So one of the biggest issues right now, obviously, is the parking. It's something that really does impact the whole area, because if 80 percent of University Avenue's on-street parking is eliminated, No. 1, where do people park as they're getting on the light rail stops, and No. 2, what happens to the small businesses without parking lots who depend on the availability of street parking for their customers?

Response T-017. The Metropolitan Council is working and has committed to continue working with the City of St. Paul to find parking solutions. The Central Corridor Project Office surveyed businesses and conducted an analysis of on-street parking impacts. An inventory of University Avenue parking supply and impacts is summarized in Section 6.3 of the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or underutilized existing parking lots.
Issue Summary T-018. Impact to parking capacity (1)

Comments:
(CCLRP0969) T-040
Parking Impacts - Identify the number of Radisson Hotel parking spaces lost to accommodate the Beacon Street extension. The cost of replacement cost and revenue loss should be included.

Response T-018. The Beacon Street extension would result in the removal of approximately 30 spaces from the Radisson Hotel parking lot. Potential revenue loss for the Hotel is not included in the cost of this. The Beacon Street extension is one of the mitigation commitments detailed in the June 2008 Memorandum of Understanding. See Chapter 6 of the FEIS for further details.

Issue Summary T-020. Impact to parking capacity (2)

Comments:
(CCLRP0965) T-047
Equally, there is already a shortage of parking in downtown and nothing is addressing the mitigation for this pre-existing shortage or the further loss of downtown on-street parking along the corridor.

(CCLRP0965) T-054
Equally, there is already a shortage of parking in downtown (as noted in DEIS and SDEIS) and nothing addresses mitigation of this pre-existing shortage or the further loss of downtown on-street parking along the corridor

Response T-020. Mitigation is generally not required for a pre-existing condition. The parking shortage is generally limited to the west end of downtown St. Paul. The implementation of Central Corridor LRT project may reduce the demand for parking.

Issue Summary T-022. Impact to parking capacity (2)

Comments:
(CCLRP0965) T-052
Parking during off peak hours, in front of the University Avenue businesses and homes, might be one option to be looked at carefully by Met Council.

(CCLRP0996) T-076
Another critical aspect of a high quality public realm is to buffer the sidewalk from vehicle traffic. Buffering can be accomplished through various means such as on-street parking, planted boulevards, and bike lanes. Given the restricted right-of-way on University Avenue, we think on street parking may be the best strategy because it can serve multiple purposes. In addition to acting as a buffer, it provides quick and convenient parking for local businesses, many of whom have no off-street parking. The provision of on-street parking can also help deter spillover parking into neighborhood streets. Finally, on street parking can serve as a
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revenue stream for the City or the local business district. Because of the important purposes that on-street parking can serve, we oppose the loss of over 80% of this valuable resource as proposed under the current plans.

Response T-022. Allowing parking on University Avenue during off-peak hours is not part of the current project definition, as discussed in the FEIS. However, the Central Corridor Project Office analyzed the potential for and impacts of providing on-street parking during off-peak travel times. The City of St. Paul can use the results of this study to implement off-peak on-street parking on University Avenue if it desires. This decision can be made at a later date or after operations; implementation of the project as described in the FEIS would not preclude the City from allowing off-peak parking on University Avenue.

Issue Summary T-023. Impact to parking capacity (1)

Comments:
(CCLRP0965) T-053
None of the ADDITIONAL loss of on-street parking spaces due to the 3 car platforms instead of 2 car platforms at any of the Stations along the Corridor have been addressed in either the DEIS or SDEIS. Your document only states "The extra platform length needed to accommodate the three car trains would typically require eliminating 3-4 additional parking spaces per platform... "

Response T-023. Parking impacts, including updated information regarding the loss of parking from station platforms, is detailed in Section 6.3 of the FEIS.

Issue Summary T-024. Impact to parking capacity (1)

Comments:
(CCLRP0983) T-062
• The loss of affordable student parking in the vicinity due to the Stadium construction and other current and future projects.
• The more circuitous routes that will need to be taken to available parking areas.
• University student, administration, bio-complex staff (estimated to be 5,000), etc. parking needs that are continuing to grow.

Response T-024. The parking issues related to the construction of the new TCF Bank Stadium and additional University related projects are the responsibility of the University of Minnesota's Parking and Transportation Services. Traffic and parking impacts are detailed in Chapter 6 of the FEIS.

Issue Summary T-026. Impact to parking capacity (2)

Comments:
(CCLRP0983) T-064
• Park and hide, where will people park, what measures will be taken to reduce the potential for park and hide behavior? What will be the effect of additional vehicles parking in areas
that are already problematic? What is the impact of this additional parking need, combined with additional traffic and pedestrian/bicycle traffic?

(CCLRP0983) T-065
In addition the loss of parking will impact neighborhoods with increased "park-n-hide" parking near the University of Minnesota, near the LRT Stations and along the corridor in general. These parking impacts need to be addressed along with the additional traffic impacts from the vehicles driving through the neighborhoods while "park-n-hiding".

Response T-026. The City of St. Paul and Minneapolis are aware of neighborhood concerns about "park and hide" activities in residential areas adjacent to the Central Corridor. The City of St. Paul is looking at strategies to discourage "hide and rider" use of on-street parking in the residential areas including strategies that the City of Minneapolis has successfully implemented to minimize "hide and ride" impacts in neighborhoods adjacent to the Hiawatha LRT. Strategies Minneapolis uses include permit parking and posted parking restrictions. See Chapter 6 of the FEIS for further details.

Issue Summary T-065. Impact to parking capacity (1)

Comments:
(CCLRP1001) T-137
The upcoming lane closures caused by the construction of LRT will present a "real time" opportunity to assess actual impacts on traffic. If traffic is manageable on University Avenue and surrounding streets during the construction lane closures, then we should keep one lane closed permanently and restore as much street parking as possible.

Response T-065. The Preferred Alternative includes LRT operating down the center of University Avenue, with two traffic lanes maintained in each direction.

Issue Summary T-066. Impact to parking capacity (2)

Comments:
(CCLRP1008) T-139
So primary concern is on the cars that are displaced, and if this study or if other studies will look at how those cars will - where they will wind up and how that will impact the communities around Washington Avenue and University

(CCLRP1008) T-140
as I look through the document it refers to removal of cars from Washington Avenue pedestrian mall, and being that we live right next to that mall, proposed mall, we wonder if those cars are going to then appear on our streets.

Response T-066. A detailed traffic study for the University of Minnesota area was conducted in April 2008. The traffic impacts to the area are detailed in Chapter 6 of the FEIS.
Issue Summary T-081. Impact to parking capacity (1)

Comments:
(CCLRP0999) T-174
Other questions that should be addressed by the CCPO if most on-street parking is eliminated: How can people avoid getting splashed by passing cars in rainy weather? Where will the snow be piled? Where will delivery trucks stop to drop or pick up a package - in the right-hand driving lane?

Response T-081. Snow removal will continue under the direction of the appropriate agencies depending on the type of road and where it is located. Delivery trucks will be required to comply with all traffic laws. Delivery vehicles may have to find alternative means for accessing certain areas.

Issue Summary T-082. Impact to parking capacity (1)

Comments:
(CCLRP0999) T-175
UPDC believes that the FEIS must include additional studies of the Snelling-University intersection that are not oriented to solving the needs of vehicles, but rather balance movement needs of people with how traffic operations should be modified to make Snelling and University a safe and successful location for LRT, designed to encourage transit oriented development. UPDC believes that additional studies should be done to determine the viability of time specific parking, allowing for on-street parking for most of the day and evening by going to one lane of traffic in each direction, then reverting to two lanes in each direction, with parking prohibited, during peak afternoon hours. The Met Council should work with Ramsey County and the City of St Paul to evaluate parking needs, coordinate efforts to replace lost parking, and put in place measures to resolve parking issues so that existing businesses and residents can remain on or near University Avenue.

Response T-082. MnDOT is expected to conduct a traffic and access study for the Snelling and University area in late 2009. The Central Corridor Project Office surveyed businesses and conducted an analysis of on-street parking impacts. An inventory of University Avenue parking supply and impacts is summarized in Section 6.3 of the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or underutilized existing parking lots. Metropolitan Council is working with the City as part of a Parking Solutions Team to identify block-by-block parking solutions for the corridor.
Issue Summary T-094. **Impact to parking capacity** (1)

**Comments:**
(CCLRP0988) T-194
As there will now be signaled intersections at every-other block, the Metropolitan Council should make a public commitment to remove four of the proposed non-signaled pedestrian crossings in the area from Lexington to Marion to restore additional street parking.

**Response T-094.** Pedestrian access is critical to the success of the project and enhancing access in the community. The City of St. Paul is considering a series of strategies to deal with the reduction of on-street parking. See Section 6.3 of the FEIS for further details.

Issue Summary T-099. **Impact to parking capacity** (1)

**Comments:**
(CCLRP0983) T-073
In the interest of retaining as much on-street parking as possible, the DCC supports investigation into a wide range of options including, but not limited to re-thinking such "mandatory elements" as the number of through travel lanes, using the outside lane for parking in off-peak hours, and strategic placement of pedestrian crossings.

**Response T-099.** Allowing parking on University Avenue during off-peak hours is not part of the current project definition, as discussed in the FEIS. However, the Central Corridor Project Office analyzed the potential for and impacts of providing on-street parking during off-peak travel times. The City of St. Paul can use the results of this study to implement off-peak on-street parking on University Avenue if it desires. This decision can be made at a later date or after operations; implementation of the project as described in the FEIS would not preclude the City from allowing off-peak parking on University Avenue.

Issue Summary T-100. **Impact to parking capacity and noise and vibration** (1)

**Comments:**
(CCLRP0983) T-058
• The concept of allowing parking along University in off-peak hours would reduce the parking impact and the potential noise and vibration impacts to staff that work in offices immediately adjacent to University Avenue.

**Response T-100.** The impacts of allowing off-peak parking on noise and vibration were not studied. Allowing parking on University Avenue during off-peak hours is not part of the current project definition, as discussed in the FEIS. However, the Central Corridor Project Office analyzed the potential for and impacts of providing on-street parking during off-peak travel times. The City of St. Paul can use the results of this study to implement off-peak on-street parking on University Avenue if it desires. This decision can be made at a later date or after operations; implementation of the project as described in the FEIS would not preclude the City from allowing off-peak parking on University Avenue.
Issue Summary T-101. Impact to parking capacity (1)

Comments:
(CCLRP0996) T-075
At the very least, one strategy for saving the on-street parking under a 4-lane configuration is to use the curb or outside lane for on-street parking and bikes except during the afternoon peak hours.

Response T-101. Allowing parking on University Avenue during off-peak hours is not part of the current project definition, as discussed in the FEIS. However, the Central Corridor Project Office analyzed the potential for and impacts of providing on-street parking during off-peak travel times. The City of St. Paul can use the results of this study to implement off-peak on-street parking on University Avenue if it desires. This decision can be made at a later date or after operations; implementation of the project as described in the FEIS would not preclude the City from allowing off-peak parking on University Avenue. Sharing a bicycle lane with a parking lane is not typically a desirable scenario.

Issue Summary T-102. Concerns about adequately mitigating loss of on-street parking (1)

Comments:
(CCLRP0998) T-074
The DEIS discusses motor vehicle parking in several sections. TLC supports metered on-street parking along the corridor and implementation of a Parking Benefit District. Angle parking should be considered on adjacent streets. City ordinances should emphasize maximum number of parking spaces allowed rather than minimums. Allowing additional on-street parking in off-peak times should be considered in lower traffic sections of University Avenue

Response T-102. Parking requirements in City ordinances are outside the purview of this FEIS. Allowing parking on University Avenue during off-peak hours is not part of the current project definition, as discussed in the FEIS. The City of St. Paul is considering several strategies to manage parking for local businesses and minimize impacts to residential areas. These strategies include posting time limits or metering the remaining on-street parking on University Avenue to encourage turnover and discourage all-day parking, signing or metering the parking along the cross streets one block north and south of University Avenue, creating parking improvement districts and encouraging shared parking of vacant or underutilized existing parking lots.
Section: 8.1 - Capital Funding Strategy

Issue Summary C&F-010. Concerns about fees and assessments not directly related or necessary to the transit (1)

Comments:
(CCLRP0965) C&F-10
Prohibit the use of fees and assessments for any additional amenities not directly related or necessary to the transit project.

Response C&F-010. A financial analysis of the Central Corridor LRT project is discussed in Chapter 8 of the FEIS.

Issue Summary C&F-019. Miscellaneous (1)

Comments:
(CCLRP0963) C&F-25
Routes will also be more congested from through-traffic due to access to the Washington Avenue bridge only circuitously from east River Road. As a result, businesses of Cedar Riverside cannot help but suffer harm.

Response C&F-019. The Cedar-Riverside businesses may benefit by having an additional transit station nearby that can provide convenient access for many customers. Economic Impacts are discussed in Chapter 5 of the FEIS. Traffic impacts are discussed in Chapter 6 of the FEIS.

Issue Summary C&F-022. Miscellaneous (1)

Comments:
(CCLRP0969) C&F-26
University/Prospect Park Biomedical research facility expansion should be added to the East Bank/Stadium Village overview. It is a legislatively-bonded, 60-acre development with an estimated value of $250 million.

Response C&F-022. Text in Sections 3.1 and 3.2 was revised to include the biomedical research facility.

Issue Summary C&F-025. Miscellaneous (1)

Comments:
(CCLRP0965) C&F-28
Apprenticeships with the Unions and Project Labor Agreements will allow for an on time and on budget project. Incentives should be added to aid in bringing the project in early and to increase segments being done on time.
Response C&F-025. Visit the project Web site (www.centralcorridor.org) for information about job opportunities and hiring practices.

Issue Summary C&F-026. Miscellaneous (1)

Comments:
(CCLRP0965) C&F-29
Funds need to be set aside to assist current Central Corridor St. Paul residents and businesses to expand and/or create new businesses that will serve current residents and businesses.

Response C&F-026. The provision of funds to help create and/or expand businesses within the corridor is not within the scope of this project.

Issue Summary C&F-038. Miscellaneous (1)

Comments:
(CCLRP0971) C&F-38
Third, LRT won't have stops close to many of these businesses, and the remaining bus service frequency will be cut. The people who ride LRT won't want to get off LRT and transfer to a bus just to get to a business, and the bus won't come as often.

Response C&F-038. After implementation of the Central Corridor LRT, Route 16 service on University Avenue will continue, but will be reduced from every 10 minutes to every 20 minutes while new routes are being added to bring riders north and south of University Avenue to the corridor.

Issue Summary C&F-039. Miscellaneous (1)

Comments:
(CCLRP0969) C&F-39
The Central Corridor should realize development opportunities while reducing impact to the urban environment.

Response C&F-039. Increased access brought by transit improvements may act as a catalyst for new investment. The adopted LPA includes an alignment that meets the purpose and need most efficiently and minimizes project impacts. The project's relationship to community planning documents and how the project would affect development opportunities are addressed in Sections 3.1, 3.2, and Chapter 5 of the FEIS. For example, St. Paul adopted the Central Corridor Development Strategy (October 2007). This document contains many strategies for mitigating development impacts while maximizing community benefits.
Section: 8.1 - Concerns about Project Cost

Issue Summary C&F-001. Not in favor of project because of project cost (1)

Comments:
(CCLRP1012) C&F-01
That we can't afford this project because of what I just mentioned about the money. It's not needed because this corridor is the most efficient one for transportation.

Response C&F-001. The purpose and need of the project is discussed in Chapter 1 of the FEIS.

Issue Summary C&F-002. Not in favor of project because of project cost (1)

Comments:
(CCLRP0957) C&F-02
Adding more debt with a rail line as proposed is irresponsible. Whether the money for the propose Central Corridor LRT project comes from the state or the federal government, it is money created from debt and THAT MUST STOP

Response C&F-002. A financial analysis of the Central Corridor LRT project is discussed in Chapter 8 of the FEIS.

Issue Summary C&F-003. Not in favor of project because of project cost (1)

Comments:
(CCLRP0958) C&F-03
The route, design, lack of congestion relief on I94, capital cost, operating and maintenance cost, insignificant additional passenger revenue and large taxpayer subsidies are the problems. The Metropolitan Council did not conduct any realistic total costs and revenue analysis for this project. It fails to address the lost time by passengers, commuters, fuel wasted, safety, congestion relief, and future extension and expansion, congestion relief, and future extension and expansion. There is also the additional costs that are not included in the Central Corridor project. Costs including the Union Depot Station, the 3 additional transit stations and some of the road changes around the U of M and perhaps others which I'm not aware.

Response C&F-003. A financial analysis of the Central Corridor LRT project is discussed in Chapter 8 of the FEIS. The purpose and need of the project is discussed in Chapter 1 of the FEIS.
Issue Summary C&F-005. **Concerns in regard to operation and maintenance costs** (2)

Comments:
(CCLRP0965) C&F-05
O and M must pay for any parking permits and enforcement.

(CCLRP0965) C&F-06
O and M should and must pay for snow removal.

**Response C&F-005.** General operations and maintenance for the Central Corridor are consistent with standard operations on the Hiawatha Corridor. Planned operations and maintenance for the Central Corridor will include snow removal on track and at stations.

Issue Summary C&F-007. **Not in favor of project because of project cost** (1)

Comments:
(CCLRP0948) C&F-07
To spend $909 million on a project that's going to destroy the avenue, which is University, in our times of -- tough times, put it that way, not only in our state, but in the country, it seems kind of extreme. That money, if available, it should be used to repair our streets, roads, highways, interstates and all the things that a lot of people travel.

**Response C&F-007.** The purpose and need for the project has been the subject of many studies over the last 20 years. The adopted LPA includes an alignment that meets the purpose and need most efficiently and minimizes project impacts. The current design of the LPA and how it affects other transportation facilities is discussed in Section 6 of the FEIS. Meeting federal cost effectiveness criteria was an essential part of entering into preliminary engineering and will be an essential criterion for entering into final design.

Issue Summary C&F-008. **Not in favor of project because of project cost** (1)

Comments:
(CCLRP1014) C&F-08
Financial assets of this project are just terrible.

**Response C&F-008.** A financial analysis of the Central Corridor LRT project is discussed in Chapter 8 of the FEIS.
Issue Summary C&F-009. Need explanation of cost effectiveness (1)

Comments:
(CCLRP0969) C&F-09
The reader would benefit from a complete definition of "CEI" and a fuller explanation of cost effectiveness considerations.

Response C&F-009. CEI is the acronym for Cost Effectiveness Index. Chapter 8 in this FEIS discusses the importance of this measure as it relates to project finances.

Section: 9.0 - Secondary and Cumulative Impacts

Issue Summary T-071. Update noted report figures and text (1)

Comments:
(CCLRP0959) T-154
Recommend a revision for the title of this figure to: Figure 1-11 Planned Transitways
Source: 2030 Transportation Policy Plan, adopted 2004

Response T-071. The figure title and source were changed to reflect this comment.

Issue Summary T-072. Update noted report figures and text (1)

Comments:
(CCLRP0959) T-155
Please note the following update for the Bottineau Transitway (aka Northwest Corridor):
Since the 2030 Transportation Policy Plan was adopted in 2004, a re-evaluation of the transit needs in the Bottineau Corridor, formerly called the Northwest Corridor, has occurred. Plans to serve this corridor with Bus Rapid Transit have been deferred. Hennepin County Regional Railroad Authority (HCRRA) is currently sponsoring an Alternative Analysis study to determine the best mode and alignment.

Response T-072. The text and figure were changed to reflect this comment.

Issue Summary T-073. Update noted report figures and text (1)

Comments:
(CCLRP0974) T-156
Chapter 9 - Indirect and Cumulative Impacts
- 9-5 Reasonably Foreseeable future actions - Include in City-Mpls actions: An Urban Partnership Agreement (UPA) Project includes funding for reconstruction including dual bus lane operations along 2nd and Marquette Avenues in Downtown Minneapolis to be completed by the end of 2009. Both of these avenues intersect with 5th St LRT operations.
- 9.2.5 - 9-7; Table 9-2 - Under Granary Road Development it states "Granary Road is planned to cut through to St Anthony Parkway South." Not sure where St Anthony
Parkway south is, if it exists. Any extension of Granary road beyond Minneapolis would need to be initiated by the City of St Paul.

- 9.2.5 - p.9-8; Table 9-2 - Under East River Parkway extension - It states that the "East Bank connection to Bridge 9 will be addressed by the U of M..." This statement is unclear. There is a City-led project to extend the bike trail on Bridge 9 East to Dinkytown.

**Response T-073.** Text in Chapter 9 and Table 9-2 was changed to reflect the information provided by this commenter.

**Issue Summary T-087.** *Update report in regard to Lafayette Bridge Project status* (1)

**Comments:**
(CCLRP0964) T-183
Page 9-5 - The Lafayette Bridge project has been advanced to 2010.

**Response T-087.** Table 9-1 was changed to reflect the information provided by this commenter.

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**Section: 11.0 - Public and Agency Coordination and Comments**

**Issue Summary C&F-024.** *Comply with contracting and labor laws* (1)

**Comments:**
(CCLRP0965) C&F-27
All contracts must include provisions to meet Davis-Bacon requirements and local initiatives to provide opportunities for minority and women-owned businesses.

**Response C&F-024.** Comment noted. The Metropolitan Council has an established Disadvantaged Businesses Enterprises program and includes specific goals in project contracts.

**Issue Summary Pp-007.** *Northern alignment* (1)

**Comments:**
(CCLRP0978) Pp-58
We think it is also important to contrast the significant staff resources of the Metropolitan Council and the Northern Alignment Steering committee which were dedicated to resolving the complex issues with University of Minnesota Alignment with the lack of staff resources dedicated to resolving the complex issues of transportation equity in the Midway East Segment of the Central Corridor LRT. The Northern Alignment Steering committee created an analysis of the alternative route of the Northern Alignment and traffic mitigation studies that included: four traffic studies, analysis of electromagnetic impacts, design criteria and an environmental analysis which resulted in a $24.6 million mitigation package for the University of Minnesota and its surrounding area. No comparable resources have been dedicated to mitigating the concerns of the environmental justice communities of east University Avenue.
Response Pp-007. The Northern Alignment Alternative Feasibility Study (May 19, 2008) was completed by the U of M at their expense and documents the U of M’s efforts to define a feasible northerly LRT alignment. A number of transportation and environmental issues were present at the U of M which required more detailed analysis to advance preliminary engineering in this area. Chapter 2 of the FEIS describes additional analysis conducted in the segment including the U of M. Mitigation proposed in the U of M area is directly related to impacts disclosed in this FEIS.

Issue Summary Pp-043. Concerns about unresolved issues (2)

Comments:
(CCLRP0969) Pp-33
Given that the Metropolitan Council intends to decide whether to adopt a revised LPA before the FEIS is complete, the Metropolitan Council may not have information with respect to the unresolved issues when it considers the revised LPA. To address these issues, the Metropolitan Council may wish to explain in the SDEIS, or in elsewhere in the administrative record (such as in response to comments on the SDEIS), the information that is currently known regarding the unresolved issues stated above as well as the other unresolved issues included in the document.

(CCLRP0969) Pp-36
The unresolved issues that the SDEIS identifies are significant, and many of these issues are of particular concern to the University. For example, the following information is not included in the SDEIS:
1. The final analysis of impacts on historic resources, including the Campus Mall Historic District, the Old Campus Historic District, the Mines Experiment Station Building, East River Parkway, Pioneer Hall, and the Prospect Park Historic District.
2. Certain traffic analyses for the University of Minnesota area.
3. The design of the Washington Avenue Mall from Pleasant to Walnut, including station and platform design and location.
4. The design of the West Bank Area.
5. The impact of vibration (both construction-related and from ongoing operations) on University research and operations.
6. The impact of electromagnetic interference (EMI) on University research and operations.
7. Detailed air quality modeling and analysis.
8. The evaluation of forty-two additional sites where there may be hazardous or regulated materials, several of which are on University property.
9. Detailed analysis of the project's "contribution to regional goals."
10. The impact of modifications to the Washington Avenue Bridge.

Response Pp-043. The FEIS includes a discussion of all known environmental issues and impacts at the time of publication.
Issue Summary Pp-044. Make list and description of unresolved issues available (1)

Comments:
(CCLRP0969) Pp-34
The SDEIS identifies many significant unresolved environmental issues and notes that the impact and mitigation will be detailed in the FEIS. A more thorough identification and analysis of unresolved environmental impacts and potential mitigations is necessary.

Response Pp-044. The SDEIS was principally focused around the nine key project elements. Throughout the preliminary engineering and final engineering phases of the project, it is foreseeable that additional environmental issues will be encountered. These will be appropriately responded to during the course of the project. The FEIS includes a discussion of all known environmental issues and impacts at the time of publication.

Issue Summary Pp-057. Approach to what mitigation measures can be considered (1)

Comments:
(CCLRP0983) Pp-30
The cost effectiveness index implemented by FTA should not limit the types or level of detail of impact assessment or what mitigation measures can be considered. The environmental review process should be conducted without regard for the effect it has on the index. The determination of who will pay for identified mitigation measures should be made in a different arena and not overflow into the environmental review process.

Response Pp-057. The environmental process followed by Metropolitan Council is consistent with FTA project development processes and incorporates all requirements set forth under NEPA.

Issue Summary Pp-058. Marketing/branding plan (1)

Comments:
(CCLRP1001) Pp-24
The continued use of the term "Central Corridor" squanders the opportunity to connect the identity of the LRT project to the branding of the University Avenue corridor. Naming of the line and the individual station areas should be integrated into marketing for the corridor. We urge that a public process be undertaken as soon as possible to help develop a marketing/branding plan for the project and the corridor.

Response Pp-058. Comment noted. Currently no marketing/branding plan exists for the project and the corridor, however, should one be undertaken, the public will be involved in its development.
Issue Summary Pp-061. SDEIS does not adequately study and resolve unresolved issues
(1)

Comments:
(CCLRP0994) Pp-31
1. The purpose of the SDEIS was to study unresolved questions related principally to changed conditions. But the SDEIS falls short of resolving these issues. Time after time, the SDEIS fails to evaluate impacts, consider alternatives, or discuss mitigation measures. The SDEIS frequently refers to continuing study and ongoing discussion of issues, and concludes by stating that remaining issues will be documented in the FEIS.

Response Pp-061. The SDEIS discusses numerous alternatives that were analyzed as a part of the environmental review process. Key issues or changes to the LPA occurring since publication of the AA/DEIS were identified and analyzed in the SDEIS and are summarized Chapter 2 of the FEIS. The process included a public comment period which provided the public a forum to raise concerns with respect to environmental issues. After the close of the comment period, the Metropolitan Council adopted the Preferred Alternative.

Issue Summary Pp-062. SDEIS does not adequately study and resolve unresolved issues
(1)

Comments:
(CCLRP0994) Pp-32
Similarly, the SDEIS states that some of the "key issues," which are supposed to be the focus of the SDEIS, "remain uncertain" or "are currently being refined." (Page S-8.) This raises foundational concerns about the environmental review process and, in turn, the conclusions derived from the process. As acknowledged in the SDEIS: "[F]ull consideration of environmental effects, as disclosed during the NEPA process, is required before the project can be advanced to the funding stage for final design, right-of-way acquisition, equipment and facilities, and system construction." (Page S-18.) This begs the question of how the SDEIS can analyze potential impacts arising from project elements that remain uncertain.

Response Pp-062. The purpose of the SDEIS was to provide a framework for local decision-making as the Central Corridor LRT project is advanced. The purpose was to inform the public, resource agencies and local governments of the changes proposed to the project since publication of the AA/DEIS in April 2006 and refinements proposed and analyzed during preliminary engineering, and to provide the public with an opportunity to participate in the decision making process.
Section: 11.0 - Agency Coordination

Issue Summary A-026. Union Depot multi-modal transit hub coordination (1)

Comments:
(CCLRP0976) A-39
Be It Further
RESOLVED, That Ramsey County Regional Railroad Authority staff will continue to work with project staff to refine the LRT component of the Union Depot multi-modal transit hub

Response A-026. Comment Noted

Issue Summary Ci-010. Utilize station plans and engage multiple project partners (1)

Comments:
(CCLRP0964) Ci-10
There are multiple partners and organizations working on the Central Corridor project. The work products of the organizations provide valuable and detailed insights into a number of the areas addressed in the SDEIS. These work products could be referenced in the SDEIS as desirable outcomes, without having to replicate the information for the SDEIS. An example of this is the City of St. Paul Central Corridor 7 Station Plans, prepared by a consultant and published June 13, 2008. The Station Plans document contains valuable information on pedestrian circulation in the station areas. Each station plan contains a chapter called "Movement-Connecting the Corridor" with sections addressing "Connections" and "The Mobility Enhancement Area." While not design documents, station plans and similar materials can guide the thinking of the designers.

Response Ci-010. The Central Corridor Project Office has worked in close partnership with the cities of Minneapolis and St. Paul, Hennepin and Ramsey counties, MnDOT and the U of M throughout preliminary engineering and will continue to do so through final design and construction. Part of this effort has been to closely track local planning processes and especially the station area land use planning processes undertaken by the City of St. Paul. The documents prepared through this process for the 7 LRT stations on University Avenue and the three stations in downtown St. Paul (which will be complete in early 2009) will be used by Central Corridor project engineers and designers.

Issue Summary Ci-011. MnDOT permit requirements (1)

Comments:
(CCLRP0964) Ci-11
Any use of or work within or affecting Mn/DOT right-of-way requires a permit. This includes any drainage modifications in or affecting flows to Mn/DOT right-of-way.

Response Ci-011. Required permits will be obtained from MnDOT where right-of-way is directly or indirectly affected.
Issue Summary Ci-012. Coordinate mitigation measures with agencies (1)

Comments:
(CCLRP0980) Ci-12
A legally binding agreement between the Metropolitan Council, the City of Saint Paul, Ramsey County, and community members and organizations assuring that reasonable mitigations will be provided with the construction of the project.

Response Ci-012. All mitigation measures committed to by the Metropolitan Council as part of this project are included in this FEIS.

Issue Summary Ci-014. Plan and coordinate mitigation schedule (1)

Comments:
(CCLRP0974) Ci-14
The mitigation construction should precede the construction of the LRT.

Response Ci-014. The project follows the FTA project development process. The FEIS process informs decision-makers on the final impacts related to the proposed project. Mitigation would assume an outcome that has not been decided.

Issue Summary Ge-015. Need process and agency coordination for transfer of property ownership (1)

Comments:
(CCLRP0969) Ge-17
Mitigation - A process for transfer of property ownership for the purpose of construction of mitigation measures and its subsequent return or transfer to another party should be established. For example, what would occur if the U transfers a street to project control and returns it to the city's control or reassumes control?

Response Ge-015. As the agency responsible for property acquisition for this project, MnDOT has well established procedures for the acquisition of rights of way for all project features including the construction of mitigation measures. It likewise has well established procedures and protocols for assisting the Council in obtaining temporary control of property (taken for temporary construction easement for example) and transfer of property back to affected interests as required.

Issue Summary Lu-015. Collaborate with government and West Bank community organizations for project design (1)

Comments:
(CCLRP0983) Lu-05
The SDEIS should include in the Social and Economic Effects Sections the 15th Avenue/Washington Parkway land use and redevelopment opportunity as identified by the West Bank Community Development Corporation. Furthermore, Central Corridor Project
Office (CCPO) and appropriate Project Partners should work with the West Bank CDC and Cedar-Riverside Community to identify and test alignment adjustments that would retain the maximum amount of developable land and not preclude reconnecting 15th Avenue across Washington Parkway. This investigation and the results should be included in the Final Environmental Impact Statement (FEIS).

**Response Lu-015.** The CCPO traffic engineers, outreach staff and designers worded the Minneapolis, the U of M and Hennepin County as well as community organizations to position the West Bank Station to better serve the West Bank residential and business communities as well as maintain connections to the U of M facilities. Building on this work and collaboration, the CCPO is working to realign the entrance/exit ramps to minimize space requirements and provide space for future development. A figure of the preferred reconfiguration of the I-35W access ramps and the West Bank station area generally is included in Section 2.2 and Chapter 6 of the FEIS along with a brief description of the plan and its effects.

**Issue Summary Pp-005.** Coordinate project with Union Depot multi-modal transit project (1)

**Comments:**
(CCLR01003) Pp-56
The FHWA is the lead federal agency for the development of the Union Depot multi-modal transit hub. It is critical that the Central Corridor LRT proposal and Union Depot proposal are consistent in describing the proposed projects. We recommend that close coordination occur between our offices to ensure consistency between the two projects. The proposed use of the Union Depot by the Central Corridor LRT will help define the purpose and need for the Union Depot multi-modal facility.

**Response Pp-005.** Metropolitan Council staff continues to closely coordinate with Union Depot multi-modal transit project partners to ensure consistency among both projects. The FHWA is the project lead for the Union Depot multi-modal transit hub and is a cooperating agency for the Central Corridor LRT project.

**Issue Summary Pp-013.** Engage Minneapolis HPC/CPED-Preservation and Design team in LRT Project (1)

**Comments:**
(CCLR00974) Pp-48
Please note that Minneapolis HPC/CPED-Preservation and Design team is also an interested party who will continue to work in the 106 process with MnDOT and SHPO.

**Response Pp-013.** Comment noted.
Issue Summary Pp-015. Engage St Paul Downtown Airport representatives in LRT Project (1)

Comments:
(CCLRP1002) Pp-49
If not already included in your distribution list, please consider giving St Paul Downtown Airport an opportunity to provide input and comments,

Response Pp-015. Comment noted.

Issue Summary Pp-038. Involve and engage Ramsey County Regional Railroad Authority staff in LRT project (1)

Comments:
(CCLRP0976) Pp-61
Be It Further RESOLVED, That Ramsey County Regional Railroad Authority staff will continue to work with project staff to satisfactorily address the issues listed in Rail Authority Resolution R06-33, dated May 23, 2006, and those raised in the Preliminary Design Plan Public Comment Record compiled by Ramsey County in June 2008, and in the document entitled "Central Corridor LRT Ongoing Coordination and Project Partner Involvement in the Decision Making Process Beyond Municipal Consent;"

Response Pp-038. Comment noted.

Issue Summary Pp-060. Coordinate with US Coast Guard for any modifications to Washington Ave bridge (1)

Comments:
(CCLRP0973) Pp-25
If modifications are made to the Washington Ave bridge which crosses the Mississippi River, the project proposer must contact the US Coast Guard because it has regulatory jurisdiction over bridges that span navigable waters.

Response Pp-060. Comment noted.

Issue Summary Pp-065. Coordinate with other agencies (1)

Comments:
(CCLRP1003) Pp-40
We recommend that the FHWA be included in the development of a traffic management plan as part of the mitigation for traffic impacts.

Response Pp-065. The Central Corridor Project Office will make an effort to involve all the relevant stakeholders in the traffic mitigation efforts. The FHWA has and will continue to be engaged in discussion regarding traffic issues, impacts and mitigation related to the Central Corridor LRT project operations.
Section: 11.0 - Community Involvement

Issue Summary Pp-004. Involve and communicate with the public and interested parties throughout project (1)

Comments:
(CCLRP0960) Pp-55
It is crucial that frequent, regular consultation continue during the completion of the project design. Consultation during design will usually produce better results than review and comment after the design is done.

Response Pp-004. The outreach team continues and will continue to engage the public in the preliminary engineering process and into construction. The outreach staff will be key in notifying businesses and residents of construction plans, road closures and bus re-routes as well as being a point of contact for construction related emergencies such as power outages. The outreach program provides many avenues for people to submit comments and concerns, which are forwarded to the planners and engineers.

Issue Summary Pp-017. Involve and engage neighborhood representatives in LRT Project (1)

Comments:
(CCLRP0999) Pp-05
It is also critical that UPDC and other neighborhood representatives be included from the beginning and throughout the process in addressing problems at the Snelling-University intersection and the adjacent I-94 ramps.

Response Pp-017. Comment noted. The study referred to in the comment is being developed by MnDOT. Questions and interest in being involved with this study should be directed to MnDOT.

Issue Summary Pp-019. Involve the community in decision-making about LRT (1)

Comments:
(CCLRP0999) Pp-50
Involve the community in decision-making about LRT throughout planning, design and construction. Correction needed in List of Recipients: In July 2007, the Merriam Park, Snelling Hamline and Lexington-Hamline district councils united to form the Union Park District Council (UPDC). But the List of Recipients for the SDEIS still includes the three extinct district councils and UPDC is omitted. We would ask that this error be corrected in the Final Environmental Impact Statement to ensure that UPDC receives all official materials related to the Central Corridor LRT in the future. UPDC should be added to the List of Recipients for the FEIS and the Merriam Park, Snelling Hamline, and Lexington-Hamline district councils should be removed.
Response Pp-019. Comment noted. This has been resolved in the FEIS

Issue Summary Pp-020. Involve and engage neighborhood local business representatives in LRT Project (1)

Comments:
(CCLRP0976) Pp-07
Be It Further RESOLVED, That the Metropolitan Council must work with the neighborhoods, local businesses and other project partners to satisfactorily resolve outstanding issues.

Response Pp-020. Public involvement efforts, as documented in the Central Corridor Project's Public Involvement Plan will continue through preliminary engineering, advanced preliminary engineering, final design and construction. A copy of this Plan is included in Appendix F of the FEIS.

Issue Summary Pp-028. Public involvement and input process (1)

Comments:
(CCLRP0983) Pp-14
In its SDEIS Work Scope comment, the DCC proposed an external review of the public involvement process. The primary purpose would be to allow community and business members and organizations, CCLRT Project staff, and Partner Agency staff to speak openly about their concerns and experiences to date, to identify process strengths, and to suggest strategies for improvement. The Citizen Representative to the Central Corridor Management Committee could chair the review process. We believe such a review would be healthy and timely. It is critical to the project's success to have a strong citizen engagement program in place prior to Final Engineering and construction.

Response Pp-028. The CCPO provides opportunities for the public to provide feedback on the outreach efforts and is open to suggestions for engaging the community. For example, the BAC was critical in providing feedback on how to communicate parking impacts to businesses on University Ave. Every six months, the outreach team reviews the effectiveness of the outreach activities and plans for upcoming meetings. The information is used to update the public involvement plan and action plan. The Council's outreach efforts have received recognition from FTA staff as a model for other cities to use. CCPO outreach staff participate in regular continuing education and training to identify ways to build on and improve our outreach activities.

Issue Summary Pp-054. Public involvement and input process (1)

Comments:
(CCLRP0965) Pp-29
The document is lacking in depth, financial commitment and references a Public Input process that has yet to be written (when last we called for a copy) and clearly has been omitted from being the hallmark which this LRT project should have as its core value.
Response Pp-054. The SDEIS is consistent with FTA project development processes. The Central Corridor LRT Communication and Public Involvement Strategic Plan was prepared in February 2007. The Central Corridor Project Office has a dedicated staff of 10 people working on communications and public involvement. Strategies to engage the public include a Community Advisory Committee, Business Advisory Council, business surveys, door to door visits with businesses, attendance at community meetings, open houses, formal public hearings, comment cards, emails and phone line. See Chapter 11 for detailed description of the public involvement activities. The public has had significant input on issues such as station location (Snelling, 29th, West Bank and Rice), pedestrian crossings to maintain access across University Avenue, parking issues, sidewalk width and vibration impacts.

Section: 11.0 - Report Clarifications/Corrections Needed

Issue Summary A-018. Add details to report Table 3-1 (1)

Comments:
(CCLRP0952) A-27
• P 3-3, Table 3-1, Downtown St. Paul Alignment/Stations add: "The diagonal alignment allows for a direct connection to the skyway system" and "The diagonal alignment provides the greatest impetus to redevelopment of the 4th/Cedar block."

Response A-018. The table described in this comment is not included in the FEIS.

Issue Summary Pp-006. Clarify and verify census, employment and other data used for calculations (1)

Comments:
(CCLRP0969) Pp-57
The University would like clarification on the characterization of employment in the U of M area as it exists today; what is included--industrial, dependant on railroad service. How were the University figures calculated?

Response Pp-006. The latest available census data were used as the source for the employment numbers. Table notes for Table 1-4 explain what is included in the calculations for employment and how the calculations were made. Reference to "dependent on railroad service" was deleted.

Issue Summary Pp-010. Unclear report text needs to be clarified (1)

Comments:
(CCLRP0959) Pp-45
Issue No. 20: What is the meaning of the asterisk (*) following Hennepin County in the column called "Involved Public Agencies/Local Units of Government"?"
Response Pp-010. This was a typing error or character error generated in the production process and not intended to signify anything specific.

Issue Summary Pp-011. Revise noted report figures, tables and text (1)

Comments:
(CCLRP0959) Pp-46
Issue No. 36 should include Hennepin County as an Involved Unit of Government

Response Pp-011. Comment noted.

Issue Summary Pp-012. Revise noted report figures, tables and text (1)

Comments:
(CCLRP0959) Pp-47
Issue No. 37 should include all project funding partners as Involved Public Agencies/Local Units of Government

Response Pp-012. Comment noted.

Issue Summary Pp-014. Revise noted report figures, tables and text (1)

Comments:
(CCLRP0974) Pp-59
• S-19 (Public Involvement) - Need to update language on county/city public hearings held in June and July

Response Pp-014. Comment noted. Public hearing dates are updated in the FEIS

Issue Summary Pp-034. Clarify and verify census, employment and other data used for calculations (1)

Comments:
(CCLRP0958) Pp-01
I am very concerned about the outdated statistics and projections that were made in the SDEIS and the DEIS. The Metropolitan Council/Central Corridor LRT supplemental environmental impact statement (SDEIS) contains many projections and estimates that are not based upon proper data. Many of the projections are based upon data that is 5 - 8 years old. The Metropolitan Council has issued several recent reports on metro area employment and the communities populations, but that information was not utilized to prepare the projections. Why? The population, new housing and employment projections are particularly concerning. The SDEIS projections don't reflect the large number local numbers of Minnesota and Location problems. The projected growth in population, employment, and housing for 2010 won't be met and the differences are large and that will carry forward to future projections utilized in the SDEIS. The population projections from SDEIS the Metropolitan Council table 1-2 for the Central Corridor are unrealistic and will not be
achieved in the time frame.

**Response Pp-034.** The most current demographic and socio-economic data/projections available is to support the SDEIS and FEIS.

**Issue Summary Pp-036.** Revise noted report figures, tables and text (1)

**Comments:**  
(CCLRP0974) Pp-60  
-2 (Figure S-I) - Map shows transit/ped mall to Oak Street; can be problematic since not clarified that endpoint is up for discussion, and ES is likely to be read by more people than whole plan; also described in text on page S-8

**Chapter 1 - Purpose and Need for the Proposed Action**
- 1-14 - Fairview Hospitals and Clinics should specifically be called out under employment opportunities in the U of M/Prospect Park segment. Augsburg College should also be represented.
- 1-22 - Under 1.4 Planning Context, the list of plans does not include a single plan in Minneapolis. The Central Corridor is addressed in:
  - The Downtown East - North Loop Master Plan (adopted 2003)
  - The Cedar Riverside Small Area Plan (adopted 2008)
  - The Minneapolis Plan for Sustainable Growth (comp plan adopted by City 2008)
  - Intermodal Station Sitting and Feasibility Study (Hennepin County, 2006)
- 1.3.3 p. 1-23 2030 Transportation Policy Plan - States that the Cedar Avenue and I35W BRT corridors would connect with the Central Corridor. This connection is indirect, at best. Similar comment for p. 1-25 where it states that the Central Corridor will serve as a distributor for several BRT corridors.
- 1.3.3 - p. 1-24; the map identifies the Bottineau Boulevard Corridor as BRT. An Alternatives Analysis is presently underway so the transit mode is not yet determined. It should be referred to as a Transitway.

**Chapter 2 - Alternatives Considered**
- 2-15 (At-Grade LRT Alignment with Transit-Pedestrian Mall Alternative) - The pedestrian/transit mall is identified as being extended east to Oak St whereas the current plan is to terminate the transit Mall at Walnut. Correct the description of the Transit Mall limits.
- 2.2.3 - p. 2-24; Table 2-1 - Include in the table the "location refined" for the West Bank Station.
- 2.3.4; Figure 2-4 - Revised Location of West Bank Station not included on graphic.

**Chapter 5 - Economic Effects**
- 5-6 (University/Prospect Park) - The draft station area plan referred to - the "University Avenue SE & 29th Ave SE Development Objectives and Design Guidelines" - is no longer a draft. It was adopted by City Council in 2007

**Response Pp-036.** Maps in the FEIS show the current extent of the transit and pedestrian mall and updated text describes it (see Chapter 2). Fairview Hospitals and Clinics and
Augsburg College were added to the FEIS text. The Planning Context list in the FEIS includes all of the plans and studies noted by the commenter. Text correction and additions were made in the FEIS to reflect the commenters remarks.

**Issue Summary Pp-037. Clarify and verify census, employment and other data used for calculations (1)**

**Comments:**
(CCLRP0999) Pp-20
UPDS recommends that a quantitative marketing study be undertaken to determine if the rail line as proposed will effectively meet the current and future transportation needs of Saint Paul, Minneapolis, and greater metro area transit riders. UPDC urges that a professional marketing company be retained to do a quantitative marketing study, using randomly selected local residents, to determine the actual needs and demands of future light rail riders. The range of questions might address such issues as:
- Whether station locations are optimal and optimally spaced;
- Whether park-and-rides are needed to accommodate those not directly adjacent to the line;
- Whether planned transit speeds will meet people's needs or if higher speeds would attract more new riders;  
- How fare increases would affect ridership;
- The potential impact of even higher gas prices on future ridership;
- What rider incentives would be most effective in attracting new riders; and
- How issues of safety, comfort, pedestrian access, bicycle access, and business parking would affect the success of the new LRT as a transit improvement and economic stimulus to encourage new development.

**Response Pp-037.** The Metropolitan Council has no plans to conduct market research to resolve issues of future travel demand or station locations. A discussion of the factors that influenced decision-making regarding these issues is found in Chapter 2, Alternatives Considered and Chapter 6, Transportation Effects of the FEIS. A marketing study may be undertaken later in the project development process to inform planners about potential effectiveness of rider incentive programs and other issues that may positively affect transit ridership and the passenger experience.

**Issue Summary Pp-040. Clarify/Correct report in regard to U of M concerns in regard to selection of Washington Avenue at-grade alignment (1)**

**Comments:**
(CCLRP0969) Pp-27
The discussion of Agency Coordination does not reflect the extent of interaction with the University of Minnesota, the high degree of concern expressed by the University in regards to changes in the project definition to remove the tunnel and opt for a Washington Avenue at-grade alignment.

**Response Pp-040.** The SDEIS discloses all additional coordination and analysis undertaken in the review of the Northern Alignment Alternative. In additional a memorandum of
understanding was developed between all parties and is included in the Appendix.

**Issue Summary Pp-045. Revise noted report figures, tables and text (1)**

**Comments:**
(CCLRP0969) Pp-35
Long-Term Effects
The alignment of the TCF Bank Stadium was changed, which no longer required the acquisition of the four buildings discussed.

**Response Pp-045.** FEIS Chapter 3 was updated to reflect all the property acquisitions required by the project.

**Issue Summary Pp-047. Improve discussion and accuracy in figures and discussion (1)**

**Comments:**
(CCLRP0969) Pp-64
Proposed Changes to AA/DEIS LPA  A more descriptive location of the Stadium Village Station should be provided.

**Response Pp-047.** The text in Chapter 3 was revised to include a better description of the location of the Stadium Village Station. Also see Chapter 2 for a description of the location.

**Issue Summary Pp-048. Improve discussion and accuracy in figures and discussion (1)**

**Comments:**
(CCLRP0969) Pp-65
Portions of the SDEIS appear to accurately describe the actions of the CCMC and the Metropolitan Council on February 27, 2008. For example, Chapter 2 of the SDEIS discusses the Metropolitan Council's action of February 27, 2008 as approval of an "option" to "refine the scope" of the proposed LRT project and "thereby set the scope of the project for inclusion in the SDEIS" (2-23). However, this section of the SDEIS inaccurately describes the Metropolitan Council's action. For example, the SDEIS terms the Metropolitan Council's action on February 27, 2008 as a "project decision day" (1-30) and states that "this SDEIS will determine the environmental effects of the revised LPA prior to the development of an FEIS" (1-31).

**Response Pp-048.** Text in Chapter 1 of the FEIS was modified to match the text in Chapter 2 in describing the actions of the Metropolitan Council on February 27, 2008.

**Issue Summary Pp-049. Revise noted report figures, tables and text (2)**

**Comments:**
(CCLRP0969) Pp-66
University of Minnesota - Mariucci Hockey Arena and Williams Arena are located in the Stadium Village Area, not the Dinkytown area.
University/Prospect Park - At-Grade Transit/Pedestrian Mall Change "Washington Avenue" to "University Avenue" in the statement: "The proposed Stadium Village Station will be located midway between the Transitway on the north and Washington Avenue on the south."

Response Pp-049. Text in Chapter 3 of the FEIS reflects the information provided by the commenter.

Issue Summary Pp-050. Improve discussion and accuracy in figures and discussion (1)

Comments:
(CCLRPO969) Pp-28
While the University is not submitting a detailed, point-by-point, analysis challenging factual components of the CCPO's letter to the FTA regarding the Northern Alignment study, the University believes that the CCPO takes liberties in offering general terminology such as "may," "likely," "appears," "underestimated," and "unusual" to describe specific technical data. The CCPO letter to the FTA does not present an accurate portrayal of the technical findings and/or the level of required analysis performed.

Response Pp-050. Comment noted.

Issue Summary Pp-051. Revise noted report figures, tables and text (1)

Comments:
(CCLRPO969) Pp-21
The University needs clarification/confirmation on whether University is considered a public utility.

Response Pp-051. The disposition of whether the utilities owned by the U of M are considered public or not is under consideration and will be resolved as review by legal counsel continues. The expectation is the decision will be documented as part of the second MOU signed with the U of M and other affected parties.

Issue Summary Pp-055. Revise noted report figures, tables and text (1)

Comments:
(CCLRPO952) Pp-68
- P 3-36, Figure 3.2-2 has Quest in the wrong location at Kellogg and Wabasha (the hotel site) and should be on block bounded by 4th/St. Peter/Kellogg/Market.
- P 3-37: 'Valley Recreation Center' should be 'Valley Play Area' and the Museum Park is NOT maintained by the City, but rather the McNally Smith College of Music
- P-3-38, Figure 3.2-3: Erikson is misspelled, it has no "c."
- Add label to the History Theater the "McNally Smith College of Music."
- P-3-59, Vehicle Maintenance and Storage Facility is now property of the Ramsey County Regional Railroad Authority
Response Pp-055. The figures and text noted in the comment were revised. The FEIS reflects the information provided by the commenter.

Issue Summary Pp-066. Revise noted report figures, tables and text (1)

Comments:
(CCLRP0969) Pp-69
Physical and Operating Characteristics of Proposed Changes to AA/DEIS LPA - Environmental Effects The proposed changes to AA/DEIS LPA column under the University/Prospect Park area should include an explanation of the transit mall section from Pleasant to Walnut in the East Bank area.

Response Pp-066. A complete description and appropriately detailed illustrations of the transit/pedestrian mall at the U of M are provided in Chapter 2 of the FEIS.

Section: 11.0 - Concerns about Project Communications and Public Involvement

Issue Summary Pp-008. Concerns about project communications and public involvement (1)

Comments:
(CCLRP0978) Pp-02
However, although the Metropolitan Council has dedicated resources to community involvement, this involvement has lacked full and fair influence in the Central Corridor planning process. As the CAC has not been allowed to forward recommendations in the form of motions to the Central Corridor Management Committee, communication between CAC members has been discouraged, and there has been overall lack of responsiveness and transparency on the part of Metropolitan Council Central Corridor staff towards specific details and concerns of the CAC.

Response Pp-008. The Central Corridor Project Office has a dedicated staff of 10 people working on communications and public involvement. Strategies to engage the public include a Community Advisory Committee, Business Advisory Council, business surveys, door to door visits with businesses, attendance at community meetings, open houses, formal public hearings, comment cards, emails and phone line. See Chapter 11 for detailed description of the public involvement activities. The public has had significant input on issues such as station location (Snelling, 29th, West Bank and Rice), pedestrian crossings to maintain access across University Avenue, parking issues, sidewalk width and vibration impacts. The CAC meeting format gives the community an opportunity to (1) share their organizations
concerns and comments and (2) hear about and discuss current plans with the CCPO engineers. At the end of each meeting, the CAC members are given an opportunity to provide feedback on the meeting format and grade its performance; average score is around 4 on a 5 point scale.

**Issue Summary Pp-009. Concerns about project communications and public involvement (1)**

**Comments:**

(CCLRP0986) Pp-03

While we have appreciated clear communications from Met Council staff since April 1, 2008, we have deep concerns about the prior process, particularly the selection of Cedar Street as the locally preferred route. To our knowledge, Central Presbyterian Church, its staff, or Session were never consulted in any of the previous studies.

**Response Pp-009.** The selection of Cedar Street as a preferred alignment for LRT in St. Paul was first made in an earlier phase of project development, with publication of a Draft Environmental Impact Statement in the early 1990s. A new phase of Central Corridor LRT project development formally began in 2001 with the announcement of a series of public and agency scoping meetings. A total of six alignment alternatives were part of the 2001 scoping of alternatives, including an alternative on Cedar Street. Through the process of scoping, including an analysis of scoping alternatives, the Cedar Street alignment was selected again as the preferred route for Central Corridor in downtown St. Paul. Notices of scoping meetings were published in the Federal Register and the Minnesota EQB Monitor as well as in the St. Paul Pioneer Press and the Star Tribune.

**Issue Summary Pp-016. Concerns about project communications and public involvement (1)**

**Comments:**

(CCLRP0999) Pp-04

- Although the CAC is meant to be a community advisory body, the members do not have the opportunity to discuss issues or to make CAC recommendations to the CCMC or the Met Council. Meetings consist mainly of technical presentations by engineers, with little time allowed for questions and comments. No motions are allowed to be put forward for consideration and no votes can be taken on possible recommendations. We believe there should be more opportunities for group discussion, potentially resulting in recommendations from the group.
- CAC member contact and discussion between meetings is discouraged. Despite many requests, the Met Council staff has refused to circulate any e-mail or phone lists for the CAC members. Given that the CAC is a public body, this restriction is unfortunate and inappropriate. We believe member contact and discussion should be facilitated, not discouraged.
- We are concerned that the membership of the BAC does not have sufficient representation from small and minority owned businesses, and that the needs of these groups are therefore not being given sufficient attention. We support the inclusion of
more small and minority owned business representatives on the BAC.

- There is a lack of transparency in the planning process for the project. Requests for data, reports, answers to questions, and meetings with experts must be placed through the Community Outreach Coordinators, who often do not return phone calls, do not provide complete answers, or take an inordinate amount of time to respond to time sensitive queries. We believe it is essential that public requests for data and meetings be promptly fulfilled. UPDC believes it is critical that the FEIS require a more robust, substantial community engagement process for the LRT project going forward. The SDEIS cites the setting up of the CAC and BAC, the hiring of community outreach coordinators, the production of informational materials, and the number of meetings held and people reached as evidence of the extensiveness of the community engagement process. What they do not measure is the degree to which the community engagement process has provided the public with a sense that their comments and concerns can make a difference.

**Response Pp-016.** The CAC meeting format gives the community an opportunity to (1) share their organizations concerns and comments and (2) hear about and discuss current plans with the CCPO engineers. At the end of each meeting, the CAC members are given an opportunity to provide feedback on the meeting format and grade its performance; average score is around 4 on a 5 point scale. CAC members are welcome to discuss issues outside of the formal meetings. When members were given an option to make their emails public most of the members asked that their emails not be shared with the entire group or the public; the CCPO staff has honored this request. The CCP is in the process of reviewing the BAC membership and attendance which includes a variety of small businesses, minority businesses and nonprofits from all communities along the corridor; comment noted. The Central Corridor Project Office has a dedicated staff of 10 people working on communications and public involvement, including timely response to requests for information as well as maintaining a website with reports, meeting minutes etc...

**Issue Summary Pp-018.** **Concerns about project communications and public involvement (1)**

**Comments:**
(CCLRP0999) Pp-06
Unfortunately, there has been little coordination to date; three separate groups have been working on station design, streetscaping, and selecting public artists. Planning for stations is moving forward without sufficient input from public artists or community members, and the public art process, as currently envisioned, severely limits the role of neighborhoods in helping to create a concept and selecting artists for each station. Early on, the station design and public art process was put forward as one area where the public would have an opportunity to "influence" the outcome. But now the stations are being designed and the public artists selected with no neighborhood involvement. It's already very late in the process, but we urge that local neighborhood committees be set up as soon as possible to help develop a distinctive concept for each station. The LRT project should develop a mitigation plan for businesses all along University Avenue to help offset disruptions during construction; this might include business consulting services, micro loans and marketing campaigns developed in cooperation with the cities. For businesses that lose on-street
parking due to the LRT, mitigation should be provided, ideally in the form of off-street replacement parking or shared parking. The project should bear some of the costs of parking mitigation, such as building a parking ramp if needed, given that the loss of on-street parking is a direct result of the LRT project. The cities should also help resolve parking issues to ensure that small businesses can continue to survive and thrive on University Avenue.

**Response Pp-018.** Comment noted. A discussion of the public art process and the ways in which the public has been and will be involved is found in Chapter 2 of the FEIS.

**Issue Summary Pp-021. Concerns about project communications and public involvement (1)**

**Comments:**
(CCLRP0965) Pp-08
The committees that have been listened to the most by Met Council and consultants and staff are not necessarily the poor, the transit dependent, or the workers who has no time to come to meetings. Those who have spoken out felt they got a sales job rather than a willing listener.

**Response Pp-021.** Comment noted. Central Corridor LRT Public meetings and hearings were intentionally staggered to provide an opportunity for participation by all. For example, the SDEIS public hearings were held on weekdays and on a Saturday and at different times of the day (afternoon and evening).

**Issue Summary Pp-022. Concerns about project communications and public involvement (1)**

**Comments:**
(CCLRP0965) Pp-09
At no time were people and businesses made aware during any of the process that there would be need for acquisition. In fact, just the opposite was asserted for both stations and substations that no acquisition would be needed in the St. Paul portion of the Central Corridor.

**Response Pp-022.** The SDEIS and FEIS describe the acquisition of public and private property necessary for the implementation of the Preferred Alternative. Section 3.3 of the FEIS details all properties that will be acquired for this project.

**Issue Summary Pp-023. Concerns about project communications and public involvement (1)**

**Comments:**
(CCLRP0991) Pp-10
Although the Metropolitan Council has dedicated resources to community involvement, this involvement has lacked "full and fair" influence in the Central Corridor planning process.

**Response Pp-023.** The Central Corridor Project Office has a dedicated staff of 10 people
working on communications and public involvement. Strategies to engage the public include a Community Advisory Committee, Business Advisory Council, business surveys, door to door visits with businesses, attendance at community meetings, open houses, formal public hearings, comment cards, emails and phone line. See Chapter 11 for detailed description of the public involvement activities. The public has had significant input on issues such as station location (Snelling, 29th, West Bank and Rice), pedestrian crossings to maintain access across University Avenue, parking issues, sidewalk width and vibration impacts.

**Issue Summary Pp-027. Concerns about project communications and public involvement (1)**

**Comments:**
(CCLRP0983) Pp-13
The DCC expresses its concern that participation in the CAC and BAC has waned over the course of Preliminary Engineering and that different community groups have felt the need to circumvent the project's involvement process in order to have their voices heard. Actions of community members/organizations and small business regarding loss of on-street parking are one example. The feeling of disenfranchisement has been especially true for representatives of Environment Justice populations many of whom have simply stopped attending CAC meetings. This sentiment has also been heard in public testimony and appears to be understated in the SDEIS.

**Response Pp-027.** In response to this comment, CCPO staff reviewed CAC membership and attendance. People that have not attended a meeting in the past 6 months were notified that they would be removed from the membership list and that staff would contact their nominating agency for a replacement. In September people were removed and staff are working with organizations like the Hispanic Chamber, Black Ministerial Alliance, Somali community and Hmong Business Association to find replacements.

**Issue Summary Pp-029. Concerns about project communications and public involvement (1)**

**Comments:**
(CCLRP0983) Pp-15
The DCC raises this issue because community participation in decision-making is identified as a mitigation strategy for Environment Justice issues. If members of those populations are feeling disenfranchised at this juncture in the project, the proposed mitigation strategy will not be effective. We also raise the issue because process for station design and public art is about to begin and there is no public involvement plan for public review and comment. Table 11-1 Key Project Issues (p. 11-12) identifies station and public art as one of the few issues the public can influence, yet suggestions from CAC members regarding the public art process have not been fully responded to by the Central Corridor Project Office.

**Response Pp-029.** Outreach to all persons regardless of ethnicity or income is a key component of the Central Corridor Communications and Public Involvement Plan. This process is described fully in Chapter 11 of the FEIS. One of the initial steps of the public art
process will be to create station specific task forces. A second step will be to create a station specific public involvement plan that takes into consideration the surrounding community as well as the strengths of the artist. One of the criteria used in selecting the artists was interest and experience in working with the public. They will be expected to hold at least 3 public meetings as well as engage the community through other venues.

Issue Summary Pp-030. Concerns about project communications and public involvement (1)

Comments:
(CCLRP1001) Pp-16
The outreach work done to date on the design of the LRT stations, and the proposed process for a public art have not sufficiently engaged the community. It appears that continuing the current process will result in designs that do not reflect the unique, special character of the different neighborhoods. We request that Met Council suspend its current approach and work with community and design professionals to create a better process. We also recommend that design professionals from area universities and design centers be incorporated into an oversight and review process. We recommend that the LRT project be designed and constructed in accordance with the "Complete Street" guidelines and that it compliment and reinforce all other public and private development along the corridor. Streetscape design is critical to promoting a safe, attractive and pedestrian friendly environment which will enhance the transit experience and help ensure the success of local businesses. It is particularly important to have a very open and inclusive community process for this phase of the work, which should engage the local business community including the University Avenue Business Association, the Hmong Business Association and the Hmong Chamber of Commerce. The public outreach process of the Met Council for the LRT project has not been adequate. Information has not been presented in a timely fashion, as typified by the last minute notification of the excessive loss of street parking. Critical policy decisions relating to station design and public art were made unilaterally by project staff with virtually no public input. The request for additional information made, such as the possibility of an additional station at Cleveland Avenue, has not been undertaken. Important policy decisions are being made without adequate information about construction schedule, staging and impacts. The overall process has not allowed for genuine, respectful, community dialogue. We do not accept a conclusion that the quantity of community meetings equates to a quality public process. We regret that the City of St. Paul has not taken a stronger role in ensuring a more successful public outreach process by Met Council. There must be minimum citizen participation standards that are maintained by the city to protect the community during the planning for all significant development projects - even if the project is undertaken by another agency. We recommend that the City convene a Task Force to develop binding protocols for how a outreach process should be undertaken, similar to that recently done by Minneapolis.

Response Pp-030. The SDEIS is consistent with FTA project development processes. The Central Corridor LRT Communication and Public Involvement Strategic Plan was prepared in February 2007. The Central Corridor Project Office has a dedicated staff of 10 people working on communications and public involvement. Strategies to engage the public include
a Community Advisory Committee, Business Advisory Council, business surveys, door to
door visits with businesses, attendance at community meetings, open houses, formal public
hearings, comment cards, emails and phone line. See Chapter 11 for detailed description of
the public involvement activities. Additionally, the CCPO created an Artist Selection
Committee made up of professionals with experience in the public art process to advise the
Metropolitan Council on the selection of artists. The committee will create a station specific
public involvement plan that takes into consideration the surrounding community as well as
the strengths of the artist. The artists will then work with the task force, outreach staff and
design team on public involvement activities related to station art.

**Issue Summary Pp-031. Concerns about project communications and public
involvement** (1)

**Comments:**
(CCLRP0990) Pp-17
The Central Corridor LRT project has not shown that many of the decisions contributing to
the loss of on-street parking were not arbitrary or preferences of engineers and planners.
There was no community process. The project did not sought out input from small business
owners about on-street parking.

**Response Pp-031.** Comment noted. The Central Corridor Project Office surveyed
businesses along the corridor regarding parking needs and strategies to address parking. The
outreach staff continue to work with the businesses to identify specific concerns and develop
solutions such as sharing parking with adjacent property owners. Parking impacts are
included in Chapter 6 of the FEIS.

**Issue Summary Pp-032. Concerns about project communications and public
involvement** (1)

**Comments:**
(CCLRP1000) Pp-18
For starters, we are asking for more timely information, for a clear understanding of who is
responsible for solving these problems, what the timeline is and what financial resources are
available for solutions.

**Response Pp-032.** The Metropolitan Council and City of St. Paul created the Parking
Solutions Team to identify solutions for addressing the loss of on-street parking on
University Ave. The information gathered via the business surveys and business outreach
activities is being used to inform the development of block level solutions. The City of St.
Paul created a one-page summary outlining potential solutions – the summary is available on
the Central Corridor project website. The outreach staff continue to work with the businesses
to identify specific concerns and develop solutions such as sharing parking with adjacent
property owners.