



Appendix A-9 Chapter 9: Agency Coordination

Appendix A-9 Chapter 9: Agency Coordination includes companion documents to the Supplemental Draft Environmental Impact Statement Chapter 9 and Appendix CR Comments and Responses documenting the Supplemental Draft EIS comments and responses. Metropolitan Council and the United States Department of Transportation - Federal Transit Administration are committed to ensure that information is available in appropriate alternative formats to meet the requirements of persons who have a disability. If you require an alternative version of this file, please contact FTAWebAccessibility@dot.gov.

To request special accommodations, contact Kaja Vang, Community Outreach Coordinator, by phone at 612-373-3918 or by email at Kaja.Vang@metrotransit.org.

Documents include Public Hearing Transcripts:

Supplemental Draft EIS Public Hearing Transcripts are included, recordings of Public Hearings are available upon request.

Documents include Supplemental Draft EIS Comment Correspondence from:

Environmental Protection Agency Region 5
City of Crystal
City of Brooklyn Park
Minneapolis Parks and Recreation Board
United States Department of the Interior
City of Minneapolis
Minnesota Department of Natural Resources
City of Robbinsdale

Section 6(f) Correspondence with:

Minnesota Department of Natural Resources

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Appendix A-9 Chapter 9: Agency Coordination Public Hearing Transcripts

Appendix A-9 Chapter 9: Agency Coordination references public hearing transcripts from July 16, 2024 and July 23, 2024 documenting public comment on the Supplemental Draft EIS. Public transcripts are public records and should you require an non printed format, recordings are available upon request. To request special accommodations, contact Kaja Vang, Community Outreach Coordinator, by phone at 612-373-3918 or by email at Kaja.Vang@metrotransit.org.

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Transcript of Public Hearing

Date: July 16, 2024

Case: Metro Transit Blue Line Extension, In Re:

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Conducted on July 16, 2024

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<p>1</p> <p>2</p> <p>3</p> <p>4 TRANSCRIPT OF PUBLIC HEARING</p> <p>5 METROPOLITAN COUNCIL MEETING</p> <p>6 JULY 16, 2024</p> <p>7</p> <p>8 METRO LINE EXTENSION</p> <p>9 SUPPLEMENTARY DRAFT ENVIRONMENTAL IMPACT STATEMENT</p> <p>10</p> <p>11 MEETING HELD AT:</p> <p>12 1256 PENN AVE N</p> <p>13 SUITE 5200</p> <p>14 MINNEAPOLIS, MN 55411</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 538536</p> <p>21 Pages: 1 - 30</p> <p>22 Transcribed by: Christian Naaden</p>	<p>3</p> <p>1 P R O C E E D I N G S</p> <p>2 MR. ZELLE: Good afternoon. This is the public</p> <p>3 hearing and Met Council committee as a whole. I'd like</p> <p>4 to call the meeting to order. I'm Charlie Zelle. I'm</p> <p>5 chair of the Metropolitan Council.</p> <p>6 We're really thrilled to be joined by some</p> <p>7 fellow Met Council members, who are coming great on</p> <p>8 queue, as well as we expect possibly some Hennepin</p> <p>9 County commissioners and, of course, members of the</p> <p>10 public are welcome.</p> <p>11 You are here for the Blue Line Extension</p> <p>12 Supplemental Draft Environmental Impact Statement</p> <p>13 public hearing, and this is July 16th, 2024, and I'm</p> <p>14 just going to ask my colleagues to introduce</p> <p>15 themselves.</p> <p>16 MS. CAMERON: Good afternoon, everyone. My</p> <p>17 name is Anjuli Cameron. I am a council member that</p> <p>18 represents District 8.</p> <p>19 MR. ZELLE: We can't hear you.</p> <p>20 MS. CAMERON: What about now? Is that better?</p> <p>21 My name is Anjuli Cameron. I am a council member that</p> <p>22 represents District 8.</p>
<p>2</p> <p>1 A P P E A R A N C E S</p> <p>2 Charlie Zelle, Metropolitan Council Chair</p> <p>3 Reva Chamblis, Metropolitan Council Member District 2</p> <p>4 Anjuli Cameron, Metropolitan Council Member District 8</p> <p>5 W. Toni Carter, Metropolitan Council Member District 14</p> <p>6 Kelcie Young, Blue Line Extension Environmental Manager</p> <p>7 Nkongo Cigolo - Met Council Public Involvement Manager</p> <p>8 Adam Wallin - Videographer</p> <p>9 Joshua Houdek</p> <p>10 Jeremiah Ellison, Minneapolis Council Member</p> <p>11 Testifying members of the public:</p> <p>12 Ron Williams</p> <p>13 Warren McLean</p> <p>14 Richard Adair</p> <p>15 Clarke Macbeth</p> <p>16 Bill English</p> <p>17 Candy Bakon</p> <p>18 John Yang</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>4</p> <p>1 MS. CHAMBLIS: Hello, my name is Reva</p> <p>2 Chamblis. I represent District 2 of the Metropolitan</p> <p>3 Council and I'm also vice chair of the Metropolitan</p> <p>4 Council.</p> <p>5 MR. ZELLE: And as I mentioned, we certainly</p> <p>6 will get more members of the public and potentially</p> <p>7 more council members, more county commissioners to join</p> <p>8 us. I'm not sure you heard me because of my microphone,</p> <p>9 but I'm Charlie Zelle, chair, and it's really a</p> <p>10 privilege to conduct this special meeting.</p> <p>11 It has been noted as a special meeting of the</p> <p>12 Met Council's Committee as a whole. Most importantly,</p> <p>13 because if we have a quorum, we want to by statute make</p> <p>14 sure that it was noticed and part of the public.</p> <p>15 Also, I'll remind everyone that we are being</p> <p>16 videotaped and it is being recorded, so this is</p> <p>17 something that can be reviewed and even the records of</p> <p>18 testimony that are being shared tonight will be</p> <p>19 videotaped. Important too, also to note that this is</p> <p>20 really an opportunity to hear from constituents, from</p> <p>21 members of the public.</p> <p>22 No business items will be conducted tonight.</p>

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<p>5</p> <p>1 With that, we are going to be receiving comments, 2 verbal testimony, and before we move on to the public 3 testimony invitation, we want to have an opportunity of 4 our brief presentations. We're very fortunate to have 5 Kelcie Young, who is the Blue Line Extension 6 environmental manager. 7 She's going to give us a quick presentation on 8 the SDEIS, and they'll come and help frame before we go 9 into public comment. So, welcome Kelcie. 10 MS. YOUNG: Thank you, Mr. Chair. Thank you 11 everyone for being here this evening as we hear 12 comments on the supplemental draft environmental impact 13 statement. I'll go over a little bit of project history 14 and basic information about the SDEIS, give a little 15 bit of an overview of the build alternative that is the 16 focus of the SDEIS in comparison to the no build 17 option. 18 And then we'll begin receiving public 19 comments. For a bit of project history, this current 20 phase of the Blue Line Extension builds on over a 21 decade of planning for the Blue Line Extension project. 22 Starting back over a decade in 2014, when the draft</p>	<p>7</p> <p>1 And the northern terminus would be up north of 2 Highway 610. That northern part of the project remains 3 on the same LRT alignment as the previous phase of the 4 project, and it's that southern two thirds of the 5 project corridor which is on new alignment and that is 6 the focus of the reason why we are doing the 7 Supplemental Draft Environmental Impact Statement. 8 The project that we are evaluating in the 9 SDEIS, includes light rail stations, pedestrian 10 bridges, bike facilities, and parking lot facilities. 11 So, what we are studying is the light rail itself, 12 along with everything else that goes along with 13 creating this project. 14 A little bit of information about the 15 Supplemental Draft Environmental Impact Statement, this 16 is part of our National Environmental Policy Act 17 required processes as part of a project that is 18 anticipated to have federal funding. This builds on our 19 previous phases of environmental review that had 20 concluded in 2016 for the prior alignment. 21 And the reason we are doing a supplemental EIS 22 is because we know that there are significant changes</p>
<p>6</p> <p>1 environmental impact statement was published. 2 The focus of that led to the 2016 final 3 environmental impact statement. That was focused on the 4 previous phase of the project. So, I'll touch on that a 5 little bit of what that means. And then in 2020, the 6 Met Council in Hennepin County decided to move the 7 project forward without using the freight rail right of 8 way. 9 And that led to several years of study into 10 other alignments that concluded in 2022 with a route 11 modification recommendation. That kicked off our 12 Supplemental Environmental Impact Statement process, 13 which culminated in the step that we're in now, where 14 the Supplemental Draft Environmental Impact Statement 15 has now been published. 16 That information is now available and that is 17 the subject of our comments here tonight. To give a 18 little bit of project history, the alignment for the 19 light-rail extension would extend from Target Field in 20 Minneapolis, and serve the communities of Minneapolis, 21 including North Minneapolis, Robbinsdale, Crystal, and 22 Brooklyn Park.</p>	<p>8</p> <p>1 to the project that we do expect that there are new 2 impacts and benefits that were not studied in the 3 previous phase of the project. So, that's why it is a 4 Supplemental Environmental Impact Statement. 5 The SDEIS studies social, environmental, and 6 economic topics, so impacts of the project, as well as 7 the benefits. There's a range of topics that are 8 studied in the SDEIS that touch on all of those topics, 9 so social, environmental, and economic topics. And 10 they're shown here on the screen. 11 And I just want to highlight in particular 12 that along with the Supplemental Draft Environmental 13 Impact Statement, we also have a section 4F evaluation 14 that studies impacts to recreation and historic 15 properties. 16 And so, the comment period for the SDEIS also 17 serves as the comment period related to section 4F, and 18 it also includes information about historic properties, 19 so that is related to our section 106 process. 20 So, historic and cultural resources are also a 21 key subject that I wanted to highlight that is also 22 subject to comment in this comment period. And with</p>

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<p>9</p> <p>1 that, we will enter into our period of receiving public 2 comment.</p> <p>3 MR. ZELLE: Thank you so much. Kelcie, as you 4 mentioned, we are at this point to invite members of 5 the public to give testimony.</p> <p>6 We're asking that the testifiers limit their 7 comments to three minutes each and just to allow 8 everyone who has signed up to speak, we are not going 9 to allow yielding of time to another speaker, so each 10 speaker gets a full three minutes.</p> <p>11 I will call five speakers at a time, just to 12 get kind of cued up and staff will help usher you. And 13 when you do come to the microphone, I ask before you 14 provide your verbal testimony, state your first and 15 last name, the name of the organization you represent, 16 provide the address or the organization's address. And 17 please speak loudly.</p> <p>18 The court reporter is here, so is actually 19 taking a transcript to be part of the official record. 20 So, in addition, as I mentioned, it is being 21 videotaped. So, there is a timer, you can see a little 22 clock when 30 seconds is remaining, you'll get a little</p>	<p>11</p> <p>1 future generations. This Draft Supplemental 2 Environmental Impact Statement we feel does a good job 3 of representing the social and environmental impacts.</p> <p>4 Transportation is the number one contributor 5 to climate change pollution in Minnesota and this 6 country, so we need to start addressing it and give 7 clean, viable, fast safe options for people to get 8 where they need to go. The Draft Supplemental 9 Environmental Impact Statement does a good job of 10 outlining both the opportunities and the impacts of 11 this project.</p> <p>12 We applaud that there is an acknowledgement of 13 anti-displacement in this document, and we want to 14 underscore that we must not assume that everyone is 15 going to automatically benefit from a project of this 16 magnitude.</p> <p>17 So, we urge that every agency, every level of 18 government, from the federal government to the state of 19 Minnesota, to the Hennepin County, and to the 20 Metropolitan Council and all the cities along the 21 corridor dig in, fund, and work diligently to implement 22 the anti-displacement plan.</p>
<p>10</p> <p>1 notice from staff, there'll be a little beep, a second 2 beep will come, I'm not sure it's a beep.</p> <p>3 Anyway, a noise when your time is up, we'll 4 thank you, and we'll go to the next speaker. So, please 5 be respectful for the next speaker, and we'll go in 6 order and make that fair. So, with that, I think we 7 understand the ground rules. We're looking forward to 8 hearing from you.</p> <p>9 We'll start with our first five speakers, 10 Joshua Houdek, Ron Williams, Warren McLean, Dick Adair, 11 Clarke Macbeth, and Claire Macbeth. Good afternoon, 12 Joshua, I see you're here and with your daughter, it's 13 wonderful of you to join us and start in.</p> <p>14 MR. HOUDEK: Thank you, Chair Zelle, council 15 members, others. My name is Joshua Houdek. I'm the 16 senior transportation land use program manager for the 17 Sierra Club Minnesota North Star Chapter, representing 18 50,000 members and supporters across the metro and the 19 state. Our address is 2300 Myrtle Avenue in Saint Paul.</p> <p>20 The Sierra Club Minnesota Chapter is a strong 21 supporter of the Blue Lion Extension for the benefits 22 that it's going to bring to current residents and</p>	<p>12</p> <p>1 Beyond that, we will be providing more in 2 depth written comments before the August 6th at 9, but 3 we wanted to be on record supporting the project and 4 supporting robust anti-displacement to make sure that 5 everyone benefits in this massive beneficial project to 6 our region and state. Thank you.</p> <p>7 MR. ZELLE: Thank you. Now we'll hear from Ron 8 Williams.</p> <p>9 MR. WILLIAMS: Good afternoon, Chair Zelle and 10 colleagues. I'm Ron Williams from City of Robbinsdale. 11 The SDEIS is the next step in the Blue Line Extension, 12 which is the last spoke in the Comprehensive Twin 13 Cities Public Transportation Plan in the making for the 14 last 20 years.</p> <p>15 It seems odd that some Robbinsdale residents 16 think they should stop this plan, which provides public 17 transportation and encourages development for 3.69 18 million residents. The Blue Line would give Robbinsdale 19 residents easier access to jobs, schools, sports, the 20 VA, and cultural events.</p> <p>21 North Minneapolis and Brooklyn Center would 22 benefit more because they are bigger cities and have</p>

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<p>13</p> <p>1 more people without cars. This LRT would also give 2 everyone in the region better access to North Memorial 3 Hospital. We need an LRT for two reasons. It moves more 4 people than BRT and spurs development while BRT will 5 not. 6 People oppose LRT because of a perceived lack 7 of safety of the trains. In recent years, some people 8 who are homeless or have substance abuse problems or 9 other mental health issues have lived on the trains, 10 especially during winter months. These are societal 11 imposed problems, not some error in transit planning. 12 Metro Transit is doing its part with police 13 officer teams coupled with social workers to offer 14 beginning help in addiction treatment and in finding 15 shelter for those on the trains who need this help. 16 There's also a big concern that the train would stop 17 emergency vehicles and disrupt auto traffic. However, 18 LRT will stop for emergency vehicles. 19 The train also stops at stoplights just like 20 every other vehicle so that a volunteer firefighter can 21 get to the fire station quickly, just as now. In 22 addition, there will be two traffic lanes inside the</p>	<p>15</p> <p>1 especially those without access to cars. Also, much 2 development will ensue. Thank you very much. 3 MR. ZELLE: Thank you very much. And now we'll 4 hear from Warren McLean. 5 MR. MCLEAN: Thank you, Chairman Zelle and 6 colleagues of the Met Council. My name is Warren 7 McLean. I'm the president of NEON, Northside Economic 8 Opportunity Network. And our address is 1007 West 9 Broadway North in North Minneapolis. Thank you for this 10 opportunity. We are thankful that there's an anti- 11 displacement group that has been meeting. 12 I have two comments though on this project. 13 One has to do with parking. We believe that there needs 14 to be a parking facility, much like the one that is 15 next to this building right here. And I'm suggesting or 16 recommending there be at least 75 million dollars to 17 fund that. We need a parking structure. 18 The second thing is in your build and no build 19 alternative, we did not see anything for business 20 disruption, and I think we need something for that. And 21 I recommend at least 250 million dollars for business 22 disruption so that businesses can actually be</p>
<p>14</p> <p>1 train tracks, which allow emergency vehicles to go past 2 other traffic. 3 Robbinsdale residents need not worry that 4 homeless people or others would get off the train and 5 wander around the neighborhood. There have been only a 6 few Metro Transit stations at Franklin Avenue, Lake 7 Street, and Downtown Saint Paul where there have been 8 such problems. Metro Transit has been working hard to 9 address those problems. 10 There won't be such problems in Robbinsdale. 11 Finally, the June 6th Sun Post reports that a 12 Robbinsdale business owner said he believes a train 13 would bring crime to the area. He said, we don't need 14 the riffraff. Of course, Minneapolis Council Member 15 Jeremiah Ellison will recognize this as dog whistle for 16 reference to his constituents. 17 The project managers will now follow this 18 advice because one of their goals is equity. Let me 19 easily add that I know of neighbors opposed to LRT here 20 who would never say anything like the important remark. 21 In sum, the Blue Line Extension will bring 22 needed public transportation for everyone, but</p>	<p>16</p> <p>1 recompensed for the pain that they'll experience as a 2 result of disruption. Thank you. 3 MR. ZELLE: Thank you. And now we'll hear from 4 Dick Adair. 5 MR. ADAIR: Thank you. Can you hear me? 6 MR. ZELLE: Yeah. 7 MR. ADAIR: Okay, good. My name is Richard 8 Adair. I live at 200 Upton Avenue South in the Bryn 9 Mawr neighborhood in Minneapolis. And I'm not 10 affiliated with any outfit. You guys have a hard job. 11 You have to balance disruption of people who 12 live in the neighborhood that the train is going to go 13 through and you're going to hear a lot about that from 14 other speakers, but there's no denying that this is a 15 very difficult thing. I have a lot of friends who live 16 near the tunnel and the Green Line, and it's been a 17 nightmare for them. 18 And I don't in any way minimize this. But I 19 would like -- I'm 81 years old, and so I have earned 20 the right to ask you to take the long view here. First 21 of all, I'm not going to repeat the comments by the 22 Sierra Club speaker about global warming, but my</p>

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<p>17</p> <p>1 grandkids are nuts about the subject of global warming. 2 They want us to do something about it. 3 And the SDEIS quantifies 22.6 million fewer 4 vehicle miles traveled and 8,000 metric tons less 5 carbon put into the atmosphere. But I'm going to talk 6 about the social effects. I happen to be a medical 7 doctor. I practiced in a sort of normal practice for 8 half of my career, and then the second half I worked in 9 a clinic where we served mostly low income, transit 10 dependent people. 11 So, I'm quite aware of what life is like for 12 people who are transit dependent. Particularly if 13 they're single parents and they don't own a car, 14 they've got to get their kids to school, they've got to 15 pick them up after school, they got to get to work, 16 they got to get home, they got to take the bus to go 17 get groceries, to medical appointments, etc., and it's 18 a nightmare. 19 Mostly, I want to talk about the children. A 20 large, very well done study at Harvard looked at 21 factors that predict which children born into poverty 22 will escape it as adults. And what do you think the</p>	<p>19</p> <p>1 has a park and ride, so there is another and 2 potentially better option for commuting to and from 3 Minneapolis, even though it's not within Maple Grove. 4 I also would like to see better bus transit in 5 Maple Grove. I know we have our own system, but at some 6 point, I would like to see like fee to routes going to 7 the Blue Line, even if that means we have to have Metro 8 Transit take over. 9 I did get a number for the service department, 10 and I look forward to there being out from there, what 11 the best option will be for that. Thank you. 12 MR. ZELLE: Thank you. Now we'll hear from 13 Bill English. Welcome. 14 MR. ENGLISH: Thank you, Chair Zelle. I have 15 to recognize my good friend, Commissioner Chamblis. 16 Thank you for your service. Now, it would be foolish 17 for me not to recognize that my relationship with Metro 18 Council has not been anything other than rocky. And I 19 say that with all due respect that we both came from 20 different sides. 21 And I recognize that's the art of government 22 and compromise in this country. So, I have no personal</p>
<p>18</p> <p>1 factors were? Two parents in the home, school quality, 2 living in a concentrated poverty zip code? None of the 3 above. 4 The most important factor was how many minutes 5 it took their parents to get to work. Think about it, a 6 short commute means more time for parenting. And when 7 these kids become young adults, light rail transit will 8 open up a big wide world of education and employment 9 options across the metro. 10 BRT is good for short trips, but only rail 11 transit can get them into distant locations in a 12 reasonable amount of time. Thank you. 13 MR. ZELLE: Thank you. Now we have two 14 Macbeths, Clarke and Claire. Is that two different 15 speakers? 16 MR. MACBETH: I'm the same guy. 17 MR. ZELLE: It's maybe two spellings. All 18 right. 19 MR. MACBETH: Sorry for the handwriting. Hi, 20 my name is Clark Macbeth. I am a council candidate for 21 Maple Grove, Minnesota, and I would just like to say I 22 really like how the [indiscernible] in Brooklyn Park</p>	<p>20</p> <p>1 feelings against anyone. But today I'm here to talk 2 about this Blue Line Extension. It is definitely 3 needed. Oh, I'm sorry, I didn't give my address. 4 I'm the principal consultant to the North Job 5 Creation Team, which operates just next door out of the 6 University of Minnesota Urban Research and Outreach 7 Center. That is an organization that is committed to 8 bringing jobs to North Minneapolis. Why? Because 9 transportation to where the real high paying jobs are 10 all where transportation is very difficult. 11 This project is going to be a long time 12 working and we need to make sure that the current 13 businesses on Broadway and also think about Plymouth, 14 need to be protected and provided some resources so 15 they don't leave these businesses because that's the 16 way we create generational wealth. And generational 17 wealth is what our community needs. 18 The second thing I would urge you to do is to 19 consider that our communities have been broken up from 20 35 W in the south to 94 in the north and to 94 between 21 Saint Paul and Old Rondo neighborhood over and over 22 again.</p>

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<p>21</p> <p>1 So, we are hopeful that as you extend this</p> <p>2 line, you pay close attention to making certain that</p> <p>3 our communities are no longer divided and our</p> <p>4 businesses are able to survive and thrive. And so, I</p> <p>5 urge you to do everything you can to connect.</p> <p>6 Consider a circular transportation system that</p> <p>7 could be minority owned and could circulate throughout</p> <p>8 the whole north side around the Upper Harbor Terminal</p> <p>9 redevelopment.</p> <p>10 That is a plan that is being considered by the</p> <p>11 Penn Plymouth Corridor Organization, and we urge you to</p> <p>12 do that. to give that strong consideration because it</p> <p>13 will bring a lot of calm, peace to the neighborhood,</p> <p>14 but more importantly, it will keep us working and keep</p> <p>15 our businesses operating. Thank you for the</p> <p>16 opportunity.</p> <p>17 MR. ZELLE: Thank you. I'll now invite Candy</p> <p>18 Bakon, who signed up to come testify.</p> <p>19 MS. BAKON: I have too many glasses on today,</p> <p>20 sorry. Thank you, Chair Zelle, and it's Bakon.</p> <p>21 MR. ZELLE: Bakon.</p> <p>22 MS. BAKON: Yeah, some candy bacon. I'm the</p>	<p>23</p> <p>1 MALE: John submitted comments, written</p> <p>2 comments.</p> <p>3 MR. ZELLE: Okay. John has made written</p> <p>4 comments. We have posted the time of 5:00 until 7:00.</p> <p>5 You, the audience here, and those who will come,</p> <p>6 there's no requirement to stay until 7:00, but we are</p> <p>7 going to be here until 7:00 just to allow for those who</p> <p>8 are coming after work or had trouble with traffic</p> <p>9 congestion, which I've observed is out there.</p> <p>10 We'll stick around. But in the meantime, why</p> <p>11 don't we just go to slide 19 and we can really kind of</p> <p>12 let everybody here know while you're here about the</p> <p>13 comments and this hearing itself is certainly not the</p> <p>14 only way in which to make comments and to share</p> <p>15 thoughts, give ideas, and we'll have a long this long</p> <p>16 comment period into mid August -- early August.</p> <p>17 But this slide kind of illustrates the</p> <p>18 different ways you can make comments online, in person,</p> <p>19 email and most importantly, to be able to tell your</p> <p>20 friends and neighbors to come to our next public</p> <p>21 hearing. We are having another one on Tuesday, July</p> <p>22 23rd at 10:00 in the Brooklyn Park Library.</p>
<p>22</p> <p>1 fun one. I bring the joy and the silliness. That's what</p> <p>2 I bring.</p> <p>3 MR. ZELLE: Now I'm familiar, so sorry.</p> <p>4 MS. BAKON: You know me, yes, many times, and</p> <p>5 I'll see you Thursday, of course. And so, I'm supposed</p> <p>6 to say thank you. Thank you because our anti-</p> <p>7 displacement committee, of course, is up and running</p> <p>8 and off the ground and the start of and you really paid</p> <p>9 attention to what we were saying and how we were saying</p> <p>10 it.</p> <p>11 And of course, we still have demands on this</p> <p>12 project, and we still want to bring the joy to this</p> <p>13 project. Well, I do. So, I want all my amenities that I</p> <p>14 can get and my disco ball. Thank you.</p> <p>15 MR. ZELLE: You are welcome anytime. Thank</p> <p>16 you. Now we also can hear from, I think it's John Yars</p> <p>17 -- [sic] did I get that correct? John Yang. He stepped</p> <p>18 up. While we are looking for John, I want to</p> <p>19 acknowledge councilmember Toni Carter's joined us,</p> <p>20 since we introduced ourselves. And also, if there is</p> <p>21 anybody here in the audience that wishes to testify</p> <p>22 you're welcome to join us.</p>	<p>24</p> <p>1 That's at 8500 West Broadway in Brooklyn Park,</p> <p>2 and we'll include some of the same information that</p> <p>3 we've done this afternoon, but it is another</p> <p>4 opportunity for people to make a formal testimony.</p> <p>5 Just to kind of also share about some next</p> <p>6 steps and what we will do with various comments, we</p> <p>7 know that many people want to provide comments on the</p> <p>8 project as a whole, not so different as what we heard</p> <p>9 today. rather than specific issues. And those may not</p> <p>10 be addressed in the SDEIS, but we have many other ways</p> <p>11 to be connected.</p> <p>12 And we just want to make sure, and you can see</p> <p>13 that with this slide. Most importantly, to make a note</p> <p>14 of the project website, bluelineext.org. That's just</p> <p>15 one word, bluelineext.org. That also gives quite a bit</p> <p>16 of detail and also will be able to read some real time</p> <p>17 comments and responses to those comments on that</p> <p>18 website.</p> <p>19 So, with that we'll just keep this slide, the</p> <p>20 next slide up about being connected. We're going to be</p> <p>21 here waiting if there's others that wish to testify.</p> <p>22 But in the meantime, unless anybody's coming forward</p>

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7 (25 to 28)

<p>25</p> <p>1 for this moment, we'll take a little break and then see 2 if there's others who will come by and we'll have an 3 opportunity for more testimony. 4 But most importantly, I just want to thank 5 those that have given their comments. We did take them 6 seriously, and we appreciate your taking the time and 7 effort to come and be here to present before us. And 8 honestly, stay tuned, because this project has 9 developed and will continue to, and a lot of it is due 10 to community input and your participation. 11 So, thank you. And with that, we're just -- 12 we're not adjourned, but we're going to pause. John 13 Yang is giving written comments, but if he would like 14 to speak -- he would like to speak. Okay, John? 15 MR. YANG: I filibustered to keep the mic 16 live. 17 MR. ZELLE: And make some comments. So, 18 welcome. 19 MR. YANG: Thank you for this opportunity. I'm 20 here on behalf of Asian Media Access, the AAPI 21 community. There's a couple of comments that I wanted 22 to cover based on the Supplemental Draft Environmental</p>	<p>27</p> <p>1 And then the eastern model, we wanted to add 2 where the residential businesses meet and not separated 3 by zoning. So, economic necessity, small businesses and 4 informal markets are vital to the economy and provide 5 essential services to employment opportunities. Number 6 three, transit oriented development. 7 We wanted to just add mixed use neighborhoods 8 around the transit stations with lively business areas, 9 often high noise around the area. So, this is based on 10 the eastern model. 11 And then, the last comment is really to just 12 having some type of financial support for the next 13 three years for us to do research and analysis based on 14 impact evaluation on the businesses and the community 15 within that area. 16 So, increasing the number of visitors to the 17 business near the Blue Line stations or increase the 18 access to employment for residents, businesses, 19 increase desirability of properties, resulting in 20 increase in property value, providing business support 21 in any business impacted from the Blue Line and 22 providing community support for the Blue Line.</p>
<p>26</p> <p>1 Impact. Number one, based on Blue Line Extension 2 chapter 1, purpose of need, we feel that the prosperity 3 is defined fairly narrow in the report. 4 Few decisions have been made based on 5 individual prosperity, and it ignores the potential of 6 the community prosperity, especially the decision on 7 the 21st Avenue versus Broadway. The concept of equity 8 should be based on cultural integration or from 9 bicultural perspective, and should not be based on 10 western culture and lifestyles. 11 And the concept of livability also is defined 12 greatly by diverse cultures. And the report has 13 reflected a very narrow focus, regardless of equity, 14 has been emphasized, but only narrowly defined as 15 community engagement activities with cultural 16 integration efforts to reach the true equity. 17 And then urban density and land use 18 willingness to sacrifice for individual inconvenience 19 for larger public goods, other comments can be 20 integrated transit. Transit systems are designed to go 21 through a major street to support these businesses and 22 accommodate for the high volume of foot traffic.</p>	<p>28</p> <p>1 So, anything from translation to getting in 2 touch with a different ethnic group that is impacted, 3 and then just helping making them be aware of the 4 changes that's happening and resources that they can 5 use for the Blue Line. Thank you. 6 MR. ZELLE: Thank you so much for that comment 7 and testimony. I'm just going to give out another call 8 if anybody is interested in providing comments. And if 9 not right now, we're going to take a break, but we're 10 going to be around, might reconvene or any 11 [indiscernible] who come between now and 7:00, so. 12 Thank you again so much for coming. 13 Hello, this is Charlie Zelle, chair, and I 14 want to reconvene this public hearing for the 15 Supplemental Draft Environmental Impact Statement, and 16 we've had a number of testifiers when we started at 17 5:00, and we had posted this meeting, which is a 18 hearing, as well as a committee of the whole for the 19 Met Council. 20 And I really want to thank the two council 21 members here who have been here until 7:00. We posted 22 that we would be open until 7:00 and we have. And we</p>

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1 appreciate the opportunity for those that have come
2 over. But at this point having heard those testimonies
3 and no one else has signed up, it is time to adjourn
4 this meeting.

5 So, thanks again for, mostly to staff who
6 pulled this off, and we'll look forward to more input
7 in the weeks ahead. So, this meeting is adjourned.

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1 CERTIFICATE OF TRANSCRIBER

2 I, Chris Naaden, a transcriber, hereby declare
3 under penalty of perjury that to the best of my ability
4 from the audio recordings and supporting information;
5 and that I am neither counsel for, related to, nor
6 employed by any of the parties to this case and have no
7 interest, financial or otherwise, in its outcome, the
8 above 29 pages contain a full, true and correct
9 transcription of the tape-recording that I received
10 regarding the event listed on the caption on page 1.

11
12 I further declare that I have no interest in
13 the event of the action.

14 

15
16
17
18 _____
19 July 24, 2024
20 Chris Naaden

21 (538536, Metropolitan Council meeting in re: Metro
22 Transit Blue Line Extension, 7-16-24)

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Conducted on July 16, 2024

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1 (1 to 4)

<p>1 2 3 4 -----x 5 IN RE: : 6 Metro Transit Blue Line Extension : 7 -----x 8 9 Public Hearing 10 Before the Metropolitan Council 11 Brooklyn Park, Minnesota 12 Tuesday, July 23, 2024 13 10:04 a.m. 14 15 16 17 18 19 20 Job No.: 542022 21 Pages: 1 - 34 22 Transcribed by: Debra McCostlin</p>	<p>3 1 MS. CHAMBLIS: Thank you so much, 2 Marion, for that introduction. 3 Please note that this public hearing 4 has also been noticed as a special meeting of the 5 Committee of the Whole. Because of a quorum, the 6 Met Council may be present at any time, but the 7 Committee of the Whole will not be transacting 8 business this morning. 9 Note, this meeting is being videotaped 10 to help us record the testimony that will be 11 shared with us this afternoon. We are here today 12 to receive public comments and verbal testimony 13 on the Blue Line Extension Environmental Impact 14 Statement Draft. Before we move on to public 15 invitation, we will hear a brief presentation on 16 the Supplemental Draft Environmental Impact 17 Statement from Neha Damle. 18 MS. DAMLE: Thank you. Hello everyone. 19 Thank you for coming this morning for this public 20 hearing. Is the sound breaking up or should I 21 be -- okay. 22 So we will be briefly understanding</p>
<p>2 1 P R O C E E D I N G S 2 MS. CHAMBLIS: Good afternoon. I would 3 like to call this public hearing and Met Council 4 Committee of the Whole to order. I'm Reva 5 Chamblis and I serve as the vice chair of the 6 Metropolitan Council. 7 I would like to welcome Hennepin County 8 Commissioner Marion Greene and I understand we 9 have some other commissioners or council members 10 that may join us later. And members of the 11 public, I welcome you to the Blue Line 12 Supplemental Draft Environmental Impact Statement 13 Public Hearing on Tuesday, July 23rd, 2024. 14 At this time I'd like to ask County 15 Commissioner Marion Greene to introduce herself. 16 MS. GREENE: Good morning everybody. 17 I'm so glad to be here. My name is Marion 18 Greene. I serve on the Hennepin County Board and 19 I also serve as the Hennepin County -- the chair, 20 I'm sorry, of the Hennepin County Regional Rail 21 Authority and we're close partners with the Met 22 Council in this project and many, many others.</p>	<p>4 1 about this project on a very high level with this 2 brief presentation. In this presentation I will 3 be talking about project history, about the SEIS 4 itself, the build alternative, how to comment on 5 the SEIS, and about the next steps. 6 Next slide, please. In this public 7 testimony, as Council Member Chamblis talked 8 about, we will take your testimony after this 9 presentation. Please speak slowly and clearly. 10 You will be called in order. And the court 11 reporter is here to record your testimony. And 12 please limit your comments and testimony 13 regarding the proposed project aspects. And 14 please limit your -- we can go back to the 15 previous one. Please limit your time to three 16 minutes so everyone gets a chance to speak. 17 Talking about the project history. 18 Next slide, please. So as we all know, the 19 original alignment, that work started more than a 20 decade ago. The draft EIS was published in 2014. 21 The final EIS was published in 2016 along with a 22 record of decision. In 2020, Met Council and</p>

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2 (5 to 8)

<p>5</p> <p>1 Hennepin County had to issue a joint statement on 2 advancing the project without using freight train 3 railway which started the route modification 4 process and the route modification report was 5 published in 2022.</p> <p>6 Because of the modified route, it was 7 required for the project to prepare a 8 Supplemental Environmental Impact Statement for 9 which the notice of intent to prepare the 10 Supplemental Draft Environmental Impact Statement 11 was also published in 2022. And here we are in 12 2024. As of June 14th of this year we have 13 published the SDEIS.</p> <p>14 So this project is an extension of 15 existing Blue Line. It connects downtown 16 Minneapolis, North Minneapolis, Robbinsdale, 17 Crystal, and Brooklyn Park. It includes LRT 18 stations, pedestrian bridges, bike facilities, 19 and park and rides, with the OMF facility at the 20 Brooklyn Park -- at the northern terminal.</p> <p>21 Next slide. Environmental Impact 22 Statement or this Supplemental Environmental</p>	<p>7</p> <p>1 converted to transportation use. That topic is 2 also studied in the SEIS and any comments 3 submitted during this comment period would also 4 count towards the comments for the 4(f) process.</p> <p>5 Section 106 process is a parallel 6 process to NEPA and is well underway and studies 7 impacts and benefits of the historic and cultural 8 resources and also utilities such as Xcel 9 transmission line, for example.</p> <p>10 Next slide, please. Can you go to the 11 next slide? Next slide, please. That's it. 12 Thank you.</p> <p>13 MS. CHAMBLIS: Okay. So thank you for 14 that presentation Neha Damle, who is the Blue 15 Line Extension Environmental Lead.</p> <p>16 I would like now to invite members of 17 the public to provide verbal testimony. We ask 18 that you keep your testimony to no more than 19 three minutes each. That will allow everyone who 20 has signed up to speak and we will not allow 21 yielding to other speakers. 22 I will call the first four speakers at</p>
<p>6</p> <p>1 Impact Statement evaluates social, environmental, 2 and economic aspects in which it evaluates the 3 impacts and benefits of the project. An 4 Environmental Impact Statement details the 5 impacts of proposed project as a part of National 6 Environmental Policy Act, or NEPA, process. And 7 as I mentioned before, the EIS for the original 8 Blue Line Extension was completed in 2016.</p> <p>9 And a Supplemental EIS is required when 10 there is a change or modification in the route, 11 or in process in general, that uncovers new 12 impacts and benefits that were not a part of the 13 previous EIS after its finalization. So from all 14 of those aspects this draft or this Supplemental 15 Environmental Impact Statement was required to be 16 prepared.</p> <p>17 Next slide. These are some of the 18 major topics that are studied in the SEIS. Along 19 with all of these topics, just wanted to 20 specifically mention a few. More of the 4(f) 21 process which is protection of recreational 22 areas, park areas, (indiscernible) from getting</p>	<p>8</p> <p>1 a time and line up as ushered when I call your 2 name to present in this room. When you come to 3 the microphone to provide your verbal testimony, 4 please state your name, first name and last name, 5 or the organization that you represent, provide 6 your address or the organization's address, and 7 please speak loudly and clearly as a court 8 reporter is recording your testimony in addition 9 to a video recording.</p> <p>10 There is a timer here that will beep 11 when your time is up if you're presenting and 12 staff at this table will also raise a sign to 13 remind you when you have one minute left, and 14 that's to my right, and you will then have 30 15 seconds to complete your public testimony. Staff 16 will raise a sign and alert you again when your 17 time is up. So please respectfully give space to 18 the next speaker when your time is up. Speakers 19 who pre-registered will be called in order.</p> <p>20 With that, I will call our first 21 speaker that has signed up in the order that I 22 have received the list. The first person is</p>

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3 (9 to 12)

<p>9</p> <p>1 Richie Song. Please come up to the podium. And 2 before you speak, Richie, I just want to do a mic 3 check. Is everyone able to hear me okay? 4 UNIDENTIFIED SPEAKER: Yes. 5 MS. CHAMBLIS: Okay. Great. 6 MR. SONG: Hello. I'm Richie Song. A 7 Class of 2026 Osseo Senior High student, and 8 resident of 55443. I'm a conservator and writer 9 for Street Style MN and my comments today will 10 not represent them. So I've been kept on with 11 the Blue Line Extension for a very long time, 12 well before 2016. It has been a long time coming 13 since this project and we really need it. 14 The Blue Line Extension is already a 15 feat of environmental justice, but noise and 16 vibration impacts should continue to be mitigated 17 without hampering travel time. Those who need to 18 be relocated deserve a hefty and fair 19 compensation. They need to be ensured that they 20 have a place to be at before they can be 21 relocated. 22 Also, in their project realignment,</p>	<p>11</p> <p>1 I also sometimes take the 722 and D- 2 line to downtown Minneapolis. It's great, but 3 it's pretty slow and sometimes it's not reliable, 4 unlike the train which will come every 10, 15 5 minutes and will be fast and frequent and 6 reliable to get to downtown Minneapolis and other 7 places in different cities. 8 For more successful Blue Line 9 Extension -- I already kind of explained 10 this -- but we do need more east-west bus routes 11 to and from the Blue Line Extension as well as 12 improved trail and bike connections so people can 13 get to and from places they need to go. And I 14 would like to express my opposition to micro 15 transit in the northwest suburbs. Thank you. 16 MS. CHAMBLIS: Thank you. Thank you, 17 Richie. 18 Our next public testimony comes from 19 Ricardo Perez from The Alliance. 20 MR. PEREZ: Hello. Is this on? Hello. 21 Hello. Oh, there we go. Hello. Good morning. 22 Myname is Ricardo Perez. I work for The</p>
<p>10</p> <p>1 Harrison and the Heritage Park neighborhoods, 2 including Golden Valley, should continue to be 3 involved in the project, including environmental 4 justice for those communities. 5 We also need to connect residents like 6 myself to the Blue Line Extension by improving 7 walk, bike, and transit connections to the Blue 8 Line, including feeder fixed bus routes to and 9 from the Blue Line Extension, including many 10 other cities like potentially Champlin, Maple 11 Grove, Plymouth, and many other cities. All 12 other negative impacts should continue to be 13 mitigated, prevented, and minimized in creative 14 and considerate ways. 15 So I'll be catching a flight tomorrow 16 and I could walk out those doors and take the 17 Blue Line if it were here today but I can't at 18 this time and it won't be as easy, but I still 19 have full support and trust in this light rail 20 project and it really is going to be one of the 21 most cost-effective projects in this nation as of 22 active light rail projects right now.</p>	<p>12</p> <p>1 Alliance at 2525 East Franklin Avenue, Suite 200, 2 in Minneapolis, 55406. I am a coalition 3 organizer and I helped staff the Blue Line 4 Coalition. Our coalition has been following the 5 Blue Line Extension Project for the past ten 6 years and for us this light train project is not 7 about a train, it's about people, and our 8 coalition represents and works with under- 9 represented disproportionately impacted 10 communities across the corridor. We've been 11 deeply involved in the work of anti-displacement 12 which points at a solution for the known impacts 13 and outcomes that black, immigrant, indigenous 14 community would experience if we do not act. 15 We celebrate all of the work that 16 Hennepin County Community Met Council has done to 17 make anti-displacement a more crucial and central 18 aspect of Blue Line Extension Project. We have 19 produced an anti-displacement report with the 20 help of the Center for Urban and Regional 21 Affairs. We also pushed for that report to be 22 adopted unanimously at the Corridor Management</p>

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<p>13</p> <p>1 Committee Meeting. And more recently this year, 2 we helped secure \$10 million from the state to 3 work on anti-displacement and that is not enough. 4 We celebrate that the Draft 5 Supplemental Environmental Impact Study does 6 recognize displacement as a known impact of what 7 is happening and we ask Hennepin County Met 8 Council and the corridor cities to continue to 9 commit to doing the work of anti-displacement. 10 We know that Met Council and Hennepin 11 County have researched this to keep help funding 12 these activities. And we also know that the 13 corridor cities, while they might say they have 14 lack of funding to work on anti-displacement, we 15 strongly believe that they can implement policies 16 that will also help us achieve the anti- 17 displacement outcomes that we all agreed on. 18 Specifically, we must work hard to 19 ensure that current residents who are long-term 20 folks who use public transit are able to stay in 21 their homes and not displace by implementing 22 programs and resources to address the increased</p>	<p>15</p> <p>1 businesses I talk to, they have no idea that the 2 Blue Line is coming through and I'm afraid that 3 some of these businesses and residents have no 4 idea of the impact of what's going to happen to 5 them until it's too late. 6 And so I -- you know, and as a St. Paul 7 resident, I live a few blocks down from the Green 8 Line in St. Paul and so I have seen all the 9 changes come through with the Green Line and so I 10 feel that there needs to be resources that needs 11 to be in place so that these residents and 12 businesses can tap into before, during, and after 13 construction because I feel that these resources 14 need to be in place and because there doesn't 15 seem to be anything concrete that's discussed or 16 talked about what's going to happen to these 17 areas that are affected. And that's it. Thank 18 you. 19 MS. CHAMBLIS: Thank you, Shoua. 20 Next we have Brandon. If you could 21 come to the podium. Make sure that your mic is 22 close to your lips so we can all hear you.</p>
<p>14</p> <p>1 property tax expenses, to address increased 2 rental expenses due to the development pressures 3 that a project like this brings into our region. 4 So for us, anti-displacement is about 5 abundance. We believe that there is enough time 6 and resources for us to show the nation how do we 7 build a project not on top of us but for us to be 8 co-creators. 9 MS. CHAMBLIS: Thank you, Ricardo. 10 Our next public testimony is from Shoua 11 S. 12 MS. SALAS: Hi. My name is Shoua Salas 13 and I am representing Acer. The address of Acer 14 is 6800 78th Avenue, Brooklyn Park, 55445. I'm 15 here today because I want to talk about some of 16 the work that I do. 17 So I'm a business navigator and I work 18 with Acer working with many of the small 19 businesses here in the area and I feel like 20 there's kind of a discrepancy between what I'm 21 hearing on the ground and what the project is 22 saying that's happening. A lot of those small</p>	<p>16</p> <p>1 MR. DETVONGSA: Hello. You can hear 2 me? 3 UNIDENTIFIED SPEAKER: Yes. 4 MS. CHAMBLIS: Yes. 5 MR. DETVONGSA: Okay. My name is 6 Brandon Detvongsa. I'm also a Brooklyn Park 7 resident, but I already gave my opinions online 8 so I'm going to speak on behalf of the loud 9 community in Brooklyn Park in Minneapolis. 10 Unfortunately, 10:00 a.m. here is a little bit 11 hard for our community, our working community in 12 Brooklyn Park, so they're at work, so I'm here to 13 represent them and most of my comment is going to 14 be on the Blue Line Project itself rather than 15 SDEIS because that is too long, whether that's in 16 English or aloud, it's just too long for a 17 community to read. 18 So I'm going to tell you a bit about 19 some good things and bad things I heard from our 20 community and kind of share that here today. For 21 our residents, they are generally very excited 22 and also very nervous about this project because</p>

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<p>17</p> <p>1 they don't know what to really expect but 2 they -- hopefully the benefits that have been 3 promised with this project, it will go forward 4 and really benefit our community. 5 So for our residents, I have heard that 6 our community has looked beyond just our Asian 7 community and look at the greater community in 8 Brooklyn Park and Minneapolis itself. They 9 looked at accessibility and saw that there are 10 community members who do not have vehicles here 11 in the Brooklyn Park and they would like to see 12 our community get access to those transportations 13 whether to the rail line or to bus 14 transportation. 15 And they would like to see more 16 transportation options besides cars because 17 Brooklyn Park is really dependent on vehicles and 18 cars itself. You see that through parking and 19 how are roads are laid out in our infrastructure. 20 So having access to more transportation is always 21 a benefit for our community who don't have cars 22 and just maybe want to take something else</p>	<p>19</p> <p>1 really get access to those investments. 2 Another concern generally, granting tax 3 increases to our community. A lot of small 4 businesses are concerned, residents are concerned 5 of what that looks like to us. 6 And generally, major things in Brooklyn 7 Park is generally crimes. We want to make sure 8 the investment addresses crimes, whether near or 9 on stations and on the train. We want to make 10 sure that these trains are safe for our community 11 to use when it comes. Thank you. 12 MS. CHAMBLIS: Thank you, Brandon. 13 Amanda? 14 MS. XIONG: All right. Hello. My name 15 is Amanda Xiong. I am a resident here in 16 Brooklyn Park and something that I just really 17 want to re-emphasize is the points that Ricardo, 18 Shoua, and Brandon had made around displacement. 19 This is a \$3.2 billion project and the anti- 20 displacement working group has been given 10 21 million to spread across five corridors and I 22 also believe across five years.</p>
<p>18</p> <p>1 because it might be better for our environment 2 long-term and just generally transportation 3 connections from -- like we mentioned earlier, it 4 was mentioned earlier about the east and west 5 connection, establishing that for like connection 6 with buses to those stations to access the rail 7 line. 8 Furthermore, the rail line is a 9 long -- is a very heavy investment to our 10 community and we want to see, along with the rail 11 line, to see really community investment, so to 12 our sidewalks, to bike lanes, make it feel safer 13 whether through generally crimes and traffic 14 safety all around. 15 And to more of the bad stuff that 16 people have concerns about generally, and 17 displacement. People do not want to be displaced 18 from their homes. As Ricardo mentioned, there's 19 been a lot of anti-displacement work going on and 20 we want to make sure we get those funds. Our 21 community are really interested in that anti- 22 displacement work and making sure our community</p>	<p>20</p> <p>1 And so the main concern here is also 2 then thinking about how long this project has 3 been going on, for about 10, 15 years. That's 4 more than half my life. And so then that makes 5 me question as well too all of the money that was 6 spent in terms of just planning this project, to 7 even residents who were promised that it would go 8 their way and yet it wasn't. And so displacement 9 has already occurred throughout this planning 10 process of the project and so even just 11 considering not just displacement amongst the 12 corridor but even outside of the corridor as 13 well, too. And so I think I just really want to 14 re-emphasize that we need more funding around 15 displacement. 16 And we talk about the Green Line a lot. 17 We compare the Blue Line Extension to the Green 18 Line because, in all honesty, it's very relevant. 19 I know it's sometimes tiring to constantly hear 20 the comparison, but then when you come across a 21 corridor that is so similar to the Green Line, 22 when you come across a corridor that is just as</p>

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6 (21 to 24)

<p>21</p> <p>1 diverse, you can't help but worry about history 2 repeating itself. 3 And considering that displacement has 4 already occurred within the past ten years, even 5 within Minneapolis of Heritage Park and Harrison 6 neighborhood, we can't help but also again re- 7 emphasize and have concerns over a Blue Line 8 Extension coming towards suburbs with the same 9 ethnic backgrounds. 10 And so I think we really would just 11 like to ask for any sort of full support in terms 12 of funding to address displacement and also even, 13 if we could, push out legislation and policies to 14 help mitigate these issues as well. That's all. 15 MS. CHAMBLIS: Thank you so much, 16 Amanda. 17 Our next public presentation is by Ron 18 Williams. 19 MR. WILLIAMS: Good morning, Madam and 20 Vice Chair. I'm Ron Williams from Robbinsdale. 21 The SEIS compares this current Blue Line 22 Extension route with a past route that employed</p>	<p>23</p> <p>1 they are dealing with this by sending officers 2 paired with social workers on trains to help 3 people with addiction and homeless problems. 4 This has reduced the illegal activity though it 5 has not eliminated it. 6 Another major concern about the Blue 7 Line Extension has been that it would displace 8 people from their businesses and homes. Working 9 to avoid displacement has been a major goal of 10 project managers since the start. Hennepin 11 County hired anti-displacement experts from U of 12 M who lead an anti-displacement working group of 13 community members including the Blue Line 14 Extension Coalition representative here today, 15 and who are right that many recommendations to 16 aid people with displacement problems. 17 This spring, Hennepin County lobbied 18 with non-profits to secure a \$10 million grant 19 from the Minnesota legislature for anti- 20 displacement measures. The county has also 21 already invested several million dollars to build 22 affordable housing to the Blue Line Extension</p>
<p>22</p> <p>1 BNSF tracks. The current route is so much better 2 because it multiplies the benefits to 3 disadvantaged communities by going through north 4 Minneapolis, thus the extension fulfills a major 5 project in both equity and public transportation 6 for those who need it. 7 People have expressed concern about 8 their safety on the Twin City trains. I rode the 9 bus to work for 30 years to the Twin Cities. 10 Since retiring, I often ride the bus and the 11 Green Line to (indiscernible). I've never felt 12 threatened on these lines. I know there's a 13 problem with addicts and homeless on the trains, 14 especially in winter. Last winter I came -- I 15 once sat on the train next to people doing drugs. 16 Well, while they were doing their thing, I did my 17 thing which was read a book. They didn't 18 threaten me. 19 But others in my situation have been 20 freaked out. They are scared because people of a 21 different color are engaging in illegal activity. 22 Sadly, Metro Council has to deal with this, but</p>	<p>24</p> <p>1 corridor in North Minneapolis. We can count on 2 project managers to employ effective anti- 3 displacement efforts for this project. 4 Finally, some people have complained 5 that the LRT crossing major streets in Downtown 6 Robbinsdale will make it unsafe for pedestrians. 7 Yet the traffic engineers for this project have 8 been working for decades to ensure pedestrian 9 safety around LRT thoroughfares. Similarly, some 10 Crystal citizens have been concerned that the LRT 11 will cause traffic flow problems off Route 81, 12 Bassick Road. This is a case where traffic 13 engineering experts know better (indiscernible) 14 such matters. Thank you very much. 15 MS. CHAMBLIS: Thank you so much for 16 your public testimony. 17 Is there anyone in the room who wants 18 to make a public testimony but has not signed up? 19 So do you need assistance to get signed 20 in? Okay. When you come up, please state your 21 name and your address and any organization that 22 you are affiliated with.</p>

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<p>25</p> <p>1 MS. FUGLIE: Thank you. I'm Claudia 2 Fuglie, 4556 Lake Drive in Robbinsdale. I'm a 3 retired, loving life person, but I represent a 4 lot of folks with disabilities and helping also 5 with seniors. And my issue right now would be 6 safety. Safety for pedestrians and bikers. I 7 need to get society to understand that a lot of 8 people can't take the city bus because of 9 accessibility issues and also things that are 10 being used on the accessible seats and someone in 11 a wheelchair can't get on a bus because of that. 12 But I can take a train. Anybody can 13 take a train. It's easy to get on, easy to get 14 off. Granted, we may have problems, but there's 15 problems all over the place. So people can't 16 argue that with me. And a person with 17 disability, when the buses came out, city buses 18 came out, it was freedom. Now that I can take 19 the train, it's like a miracle. It's like crazy. 20 So I really need people to understand the trains 21 are important. 22 And we bring in the people who don't</p>	<p>27</p> <p>1 up for public testimony and then we will return 2 and I will be here the entire time. Thank you. 3 (Off the record.) 4 MS. CHAMBLIS: Hello. And it looks 5 like we have another person who will be providing 6 public testimony for today's Supplemental Draft 7 Environmental Impact Statement Public Hearing. 8 And we have at the podium, I believe, 9 Jonathan Wescott. Please introduce yourself, 10 state your first and last name or the 11 organization that you represent, provide your 12 address or your organization's address, and 13 please speak loudly and clearly as our court 14 reporter is recording your testimony in addition 15 to the video recording. 16 There is a timer that will beep when 17 your time is up and I see that you see where the 18 orange sign is. That will be raised when you 19 have 30 seconds left. The staff will raise a 20 sign to alert you when your time is up and please 21 give respectful space to the next speaker when 22 your time is up. Speakers who are pre-registered</p>
<p>26</p> <p>1 have vehicles, they can't afford a car, and for 2 myself, I can roll on a train, go where I need to 3 go, and have no problem. So whatever you do, 4 safety is one of my priorities and that we can 5 get this train into Robbinsdale and get where 6 everybody needs to get the train. Thank you. 7 MS. CHAMBLIS: Thank you for your 8 public testimony. We will make sure that your 9 name and address is recorded and we can assist if 10 needed for that. 11 MS. FUGLIE: That's all right. They 12 don't need to know where I am. 13 MS. CHAMBLIS: Oh, we see you. We see 14 you. Thank you. 15 Is there anyone else who would like to 16 make a public testimony that may have not signed 17 up? Okay. We have until 12:00 p.m. for open 18 testimony and so we will be here until 12:00 p.m. 19 to make sure that anyone that is arriving between 20 now and that time can get signed up and make a 21 public testimony. So for right now I think we 22 will take a break and allow people to get signed</p>	<p>28</p> <p>1 will be called in the order that they are signed 2 up. With that, go ahead, Jonathan, with your 3 public testimony. 4 MR. WESCOTT: Thank you, Council 5 Member. Thank you, Council Member. My name is 6 Jonathan Wescott. I'm a resident of South 7 Minneapolis and I currently use the Blue Line to 8 get to and from work. I currently use the Blue 9 Line to get to and from work at the Minneapolis 10 Airport. I'm excited to see the project built, 11 however I would like to see a couple of changes 12 made to the project. 13 First of all, I'd like to see the 14 implementation of more gated crossings and the 15 removal of the signalized intersections to 16 properly prioritize the train as at any given 17 crossing the train will have more people on it 18 than any intersection would have cars waiting in 19 it. 20 Being from South Minneapolis, I 21 regularly use the Blue Line and the delays that 22 would be caused by signalized intersections if</p>

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<p>29</p> <p>1 the train is not properly prioritized will result 2 in inconsistent schedules and less reliability 3 (indiscernible) as well. 4 I would also like to see a change made 5 in Minneapolis to follow the alternative 6 alignment as this seems like the more reliable 7 and safer routing of the train through the 8 Northern Minneapolis area. I'd like to see it 9 follow -- I'm sorry -- with one change. I'd like 10 to see it follow the I-94 route, however rather 11 than running at the same level as Washington 12 Avenue, I'd like to see it run along the on-ramp 13 to 94 underneath Plymouth Avenue, have a station 14 located under Plymouth Avenue with vertical 15 circulation access to both sides of Plymouth 16 Avenue. 17 The change in station location could 18 easily made to have a larger cabin area by 19 utilizing the (indiscernible) which already runs 20 right along there using cross-platform transfers 21 (indiscernible) transfer between a bus and a 22 train to expand the (indiscernible). This would</p>	<p>31</p> <p>1 would like to testify? Seeing none, I would like 2 to thank you all for your participation today. 3 There are many ways for you to share your 4 thoughts and ideas with us during the public 5 comment period. This slide that is behind me 6 illustrates how you can receive -- you can send 7 in and we will receive your comments through 8 email, snail mail, online, in-person, and through 9 a hotline number at 612-373-3970. 10 Our next steps, the project staff will 11 complete, consider, and respond to comments 12 received regarding the Supplemental Draft EIS by 13 August 6th. Your comments will inform and be 14 addressed in the Supplemental Final Environmental 15 Impact Statement scheduled to be published mid 16 next year. 17 We also know that some may like to 18 provide comments on the project as a whole or on 19 particular issues that may not be addressed in 20 the Supplemental Draft Environmental Impact 21 Statement. We have many ways for you to stay 22 connected with us and this slide behind me</p>
<p>30</p> <p>1 probably be cheaper and safer than running it on 2 10th Avenue and cost less as well as there will 3 be fewer -- especially with the major utilities 4 that would have to be moved along 10th Avenue. 5 I'd then like to see the train continue 6 along the on-ramp there underneath the Washington 7 Avenue exit and then have an elevated, or sorry, 8 switch to an elevated line which would require 9 about a 2.8 percent grade by my estimations from 10 underneath the Washington Avenue to have a level 11 crossing with Broadway Avenue, which would of 12 course be gated or I'd like to see gated, and 13 then have a higher speed curve over to 21st 14 Avenue as opposed to the sharp corner right now. 15 This would reduce the wear and tear on 16 the rail entrance and as a result of acceleration 17 and deceleration from the stoplights or the 18 signalized intersections and the tight curve at 19 the Broadway, or sorry, Washington Avenue and 20 21st intersection. Thank you. 21 MS. CHAMBLIS: Thank you for your 22 testimony. Is there anyone else in the room that</p>	<p>32</p> <p>1 indicates the many ways that you are still able 2 to connect with our project team throughout the 3 SEIS and the process afterwards. 4 With those final announcements, I would 5 like to adjourn the Blue Line Extension 6 Supplemental Draft Environmental Impact Statement 7 Public Hearing and the special council meeting of 8 the Committee of the Whole for Met Council. 9 Thank you for your time and have a great day. 10 (Off the record.) 11 12 13 14 15 16 17 18 19 20 21 22</p>

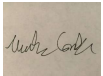
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foregoing proceedings were fully sworn; that the
proceedings were recorded by me and thereafter
reduced to typewriting by a qualified
transcriptionist; that said digital audio
recording of said proceedings are a true and
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financial or otherwise, in its outcome.



MALCOLM COOKE,
NOTARY PUBLIC FOR THE STATE OF MINNESOTA

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DEBRA MCCOSTLIN
JULY 26, 2024

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REGION 5
CHICAGO, IL 60604

July 31, 2024

VIA ELECTRONIC MAIL ONLY

Anthony W. Greep, Director
Office of Planning & Program Development
Federal Transit Administration
200 West Adams Street
Chicago, Illinois 60608

Re: EPA Comments – Supplemental Draft Environmental Impact Statement for the Metro Blue Line Extension, Hennepin County, Minnesota – CEQ No. 20240111

Dear Mr. Greep:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Transit Administration's (FTA) Supplemental Draft Environmental Impact Statement (SDEIS) dated June 2024, concerning the above-mentioned project. FTA, the lead Federal agency, and the Metropolitan Council (Council), prepared the SDEIS for the proposed Metro Blue Line Extension (Project). This letter provides EPA's comments, pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The 2016 Project alignment¹ included an approximately 13.5 mile double-track extension of the METRO Blue Line with 11 new light rail transit (LRT) stations, approximately 1,670 park-and-ride spaces, accommodations for drop-off and bicycle and pedestrian access, and one operations and maintenance facility. The METRO Blue Line would extend northwest from Target Field Station in Downtown Minneapolis, connecting the region's northwest suburbs – the cities of Robbinsdale, Crystal, and Brooklyn Park – with the region's system of transitways.² The Project was designed to help reduce regional disparities and provide benefits to current and future residents of the project area by providing access to healthcare, education, jobs, and recreation in the area.

¹ Publication of a Final EIS/Section 4(f) Evaluation and Record of Decision dated 2016.

² The region's system of transitways consist of existing LRT on the METRO Blue Line and METRO Green Line; bus rapid transit on the METRO Red Line (Cedar Ave), METRO Orange Line (Interstate 35W [I-35W]), METRO C Line, and METRO D Line; the Northstar Commuter Rail; and express bus routes, as well as planned BRT transitways (Gold and Purple Lines) and planned arterial BRT transitways (B, E, and F Lines).

Approximately 8 miles of the 2016 Alignment was located in freight rail right-of-way within the Monticello subdivision located between Olson Memorial Trunk Highway 55 in the City of Minneapolis and 73rd Ave N in the City of Brooklyn Park. Negotiations to secure the necessary right-of-way to allow construction of the Project in the freight rail right-of-way were unsuccessful.

Consequently, in 2020 it was determined that a modified alignment that would avoid use of the freight rail rights-of-way needed to be identified. FTA and the Council determined that design changes resulting from a modified alignment would result in new impacts and warranted analysis in a supplemental EIS.

The SDEIS evaluates anticipated effects from two alternatives:

- **No Build Alternative:** reflects existing conditions and committed improvements to the regional transit network for the horizon year of 2045. Based on the Council’s 2040 Transportation Policy Plan, major transportation improvements assumed under the No-Build Alternative include:
 - Trunk Highway 65 and 3rd Ave S bridge rehabilitation over the Mississippi River, Minneapolis,
 - Trunk Highway freeway conversion/I-94 from Trunk Highway 610 to Dowling Ave and installation of E-ZPass lanes in the Cities of Brooklyn Park, Brooklyn Center, and Minneapolis, and
 - modest changes to transit service in the Project area, particularly the arterial Bus Rapid Transit lines or feeder service to the METRO Green Line Extension.

The No Build Alternative does not propose construction and operation of the 2016 Project.

- The proposed project alignment would be center running along County Road 81 south of 73rd Ave N in the City of Brooklyn Park and transition to N 21st Ave east of Knox Ave, crossing I-94 on a new N 21st Ave bridge, and traversing Washington Ave, 10th Ave, and 7th Ave to Target Field Station. The proposed build alternative organized by each of the four Project-area cities includes the following:

City	Alignment	Stations	Other Features
Brooklyn Park	Center running along W Broadway Ave from north of TH 610 to about 73rd Ave N, then transitioning to the median of CR 81	<ul style="list-style-type: none"> • Oak Grove Pkwy • 93rd Ave N • 85th Ave N • Brooklyn Blvd • 63rd Ave N 	<ul style="list-style-type: none"> • OMF north of Oak Grove Pkwy Station • Park-and-ride facility at Oak Grove Pkwy Station • Bridge from W Broadway Ave to CR 81 • Pedestrian bridge at 63rd Ave N Station
Crystal	Center running along CR 81	<ul style="list-style-type: none"> • Bass Lake Rd 	<ul style="list-style-type: none"> • Interchange at Bass Lake Rd with four through lanes • Park-and-ride facility adjacent to station

Robbinsdale	Center running along CR 81	<ul style="list-style-type: none"> • Downtown Robbinsdale (either north or south of 40th Ave N) • Lowry Ave 	<ul style="list-style-type: none"> • Park-and-ride facility in Downtown Robbinsdale (U.S. Bank site) • Relocated Robbinsdale Transit Center
Minneapolis	<ul style="list-style-type: none"> • Center running along CR 81 between Lowry Ave and Knox Ave N • Transitions to N 21st Ave east of Knox Ave N; tracks on the south side of N 21st Ave • Crosses I-94 on a new N 21st Ave bridge • Turns south to be center running along Washington Ave • Turns southwest to follow 10th Ave, then turns southeast on 7th Ave to Target Field Station 	<ul style="list-style-type: none"> • Penn Ave • James Ave • Lyndale Ave • Plymouth Ave 	<ul style="list-style-type: none"> • Reconstruction of W Broadway Ave between Knox Ave N and Lyndale Ave N • Enhanced pedestrian and bicycle accommodations along cross streets connecting W Broadway Ave and N 21st Ave • New bridge connecting N 21st Ave across I-94 • Transit/pedestrian/bicycle mall on 10th Ave between Washington Ave and N 5th St

The Build Alternative's expected benefits include:

- supporting regional and local land use plans to encourage urban growth centers of mixed-use density;
- decreasing daily vehicle miles traveled by approximately 39,600 miles in the horizon year 2045, resulting in lower energy use and reduced greenhouse gas emissions;
- improve overall community cohesion by creating community connections to key destinations via reliable and efficient transportation;
- improve connectivity across the highway via the proposed multimodal bridge across I-94, a barrier between North Minneapolis and the Mississippi River and the rest of the City of Minneapolis;
- link affordable housing to jobs and result in economic growth in an area harmed by redlining, racial covenants, land acknowledgments, and freeway development; and
- increase employment and spending in the region during the construction period.

EPA's detailed comments on the EA are enclosed with this letter and focus on project design and alternatives; environmental justice; air quality; water quality; threatened and endangered species; environmental effects, energy efficiency and environmental best practices; construction effects; noise and vibration; cumulative effects, and interagency coordination.

Thank you for the opportunity to review and provide comments on this project. When the Supplemental Final EIS (SFEIS) is finalized, please notify our office electronically at R5NEPA@epa.gov. If you have any questions about this letter, please contact the lead NEPA Reviewer, Kathy Kowal, via email at kowal.kathleen@epa.gov.

Sincerely,

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Health, and Environmental
Review Division

Enclosures:

EPA's Detailed Comments
Construction Emission Control Checklist

EPA's Detailed Comments
Supplemental Draft Environmental Impact Statement for the
Metro Blue Line Extension
July 31, 2024

1. PROJECT DESIGN / ALTERNATIVES

- A. Appendix A-2, Alternatives Development Process, indicates alignment and design option locations were shared during extensive stakeholder and public engagement throughout 2023, culminating in formal alignment and design option location decisions preferred by local municipalities. In light of this information, demonstrate community support for the proposed alignment by including coordination with stakeholder groups in the project area.

Recommendations for the SFEIS:

1. Discuss how public feedback received on the 2022 *Route Modification Report Addendum* pertaining to recommendations for additional stations and improved station access was addressed in the development of the Build Alternative.
 2. EPA recommends summarizing coordination with and include letters of support from stakeholder groups in Appendix A-4: Community and Society Analysis.
- B. Chapter 3, Transportation, indicates FTA's Simplified Trips-on-Project software (STOPS) was used to develop travel ridership forecasts for the proposed Project. Two STOPS models were developed: one calibrated to pre-COVID-19-pandemic (2019) transit demand and a second calibrated to post-COVID-19-pandemic (2022) transit demand. Socioeconomic data is used to model increases from existing transit ridership derived from an on-board survey to forecast year levels. In the pre-COVID-19-pandemic model, socioeconomic data from 2018 was considered representative of a base year of 2019, and 2040 data were used to determine horizon year (2040) demand. Similarly, 2020 data was used in the post-COVID-19-pandemic model to represent the base year (2022), and 2050 data was considered representative of a 2045 horizon year. It is unclear why 2020 socioeconomic data was used to represent base year 2022.

Recommendations for the SFEIS:

1. Explain the basis for using 2020 data, at the start of the COVID-19 pandemic, to represent post-COVID-19 transit demand and implications to travel ridership forecasts.
- C. The SDEIS indicates the Minneapolis alignment would cross I-94 on a new N 21st Avenue bridge. Numerous vehicular and pedestrian bridges, roadway realignment and reconstructions, and lane additions are also proposed.

Recommendations for the SFEIS:

1. Discuss coordination with the Federal Highway Administration (FHWA), Minnesota Department of Transportation, and Hennepin County road authorities concerning the

proposed Project. EPA recommends summarizing coordination with and include letters from these agencies in Appendix A-3, Traffic and Aviation Documents.³

- D. Chapter 3, Transportation, indicates the loss of parking has been raised as a concern, and parking utilization studies would be completed to better understand parking needs and identify locations to preserve parking. The SDEIS is not clear when such studies would be completed.

Recommendations for the SFEIS:

1. Complete parking utilization studies for each city and identify locations to preserve and/or create new parking before issuing the SFEIS. The loss of parking and related impact to users and businesses is a connected action and should be analyzed in the SFEIS so reviewers can understand proposed effects.
- E. Chapter 4, Community and Social Analysis, indicates reconfiguration of 10th Ave N to create a transit mall or one-way vehicular traffic and the closure of 21st Ave N to vehicular traffic with an addition of a bicycle facility between I-94 and James Ave. The SDEIS does not appear to analyze the effects from street closures, in addition to loss of parking, in Minneapolis.

Recommendations for the SFEIS:

1. Analyze effects of street closures. In particular, discuss which street(s) drivers will likely use as alternatives and the forecasted Level of Service on the alternates when traffic is permanently redirected.
- F. The proposed Project includes changes to the pedestrian environment around LRT stations and adjacent to the Project alignment. For example, in the City of Brooklyn Park, the Project includes reconstruction of 33 existing intersections with ADA-compliant pedestrian facilities. Nine new ADA-compliant intersections would be added, and 3 new pedestrian roadway crossings would be installed where no crossing currently exists. The results of the pedestrian level of traffic stress analysis show an improved and acceptable level for pedestrians for the Build Alternative except for 85th Ave N at W Broadway Ave, where pedestrian conditions would be improved but still uncomfortable.

Recommendations for the SFEIS:

1. Explain why some crossings would remain uncomfortable for users. Discuss obstacles that preclude improvements to increase the level of walkability at these crossings. What changes might be considered if the uncomfortable crossings are not used by pedestrians?
2. Discuss proposed changes alerting drivers to pedestrian crossings (e.g., crosshatch markings at crosswalks, traffic cameras, social media blitz, increased traffic fines, etc.).

³ Federal Aviation Administration issued a letter indicating concurrence with the updated 2023 Crystal Airport Runway Protect Zone alternatives analysis conclusion.

3. Commit to adding signage at all crossings to increase pedestrian and bicyclist safety.
4. Similarly, explain why some intersections are predicted to operate over capacity. Analyze obstacles that preclude improvements to reduce peak hour congestion. Discuss whether project elements incorporated into the 2040 build conditions modeling⁴ could be incorporated to reduce congestion.

G. Include additional exhibits to help reviewers understand Project components.

Recommendations for the SFEIS:

1. Include additional exhibits or links to the specific section of the Project website to provide reviewers with a general idea of what atypical proposed changes would look like⁵.
2. Recommend creating exhibits with street names corresponding to proposed station and park-and-ride locations as stated in the Preferred Alternative so reviewers can easily understand where transit amenities are proposed.

2. ENVIRONMENTAL JUSTICE (EJ)

- A. Executive Order (EO) 14096: *Revitalizing Our Nation's Commitment to Environmental Justice* for All supplements EO 12898: Federal Actions to Address Environmental Justice in Minority and Low-Income. EO 14096 directs Federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative effects of environmental and other burdens on communities with EJ concerns.

Section 3(b)(i) of EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with environmental justice concerns when carrying out responsibilities under Section 309 of the Clean Air Act⁶. EPA's recommendations below suggest opportunities to further analyze, disclose, and reduce effects to communities with EJ concerns.⁷

⁴ Located in Appendix A-3, Traffic and Aviation Documents, pg. 33.

⁵ Design features such as flyover bridges, conversion of full-access intersections to right-in/right-out intersections, free right-turn lanes, enhanced pedestrian bridges, vehicle slip lanes, elevated stations.

⁶ 42 U.S.C. 7609

⁷ For purposes of NEPA review, EPA considers a project to be in an area of potential EJ concern when the area shows one or more of the thirteen EJ indices at or above 80th percentile in the nation/state on EJScreen. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present.

The SDEIS indicates the proposed Project will result in the following effects, predominantly in BIPOC⁸ communities.

	Commercial		Residential		
City	Parcel Acquisitions	Relocations	Parcel Acquisitions	Relocations	Lost Parking Spaces
Brooklyn Park	2	2	0	0	411
Crystal	3	6	0	0	83
Robbinsdale	5	1	3	0	252
Minneapolis	13	11	18	14	828
Total	23	20	21	14	1574

Because outreach and meaningful engagement are underlying pillars of EJ, EPA expects mitigation measures to address disproportionate effects that are unavoidable.⁹ It is imperative that FTA develops mitigation for unavoidable effects to underserved communities with input from the impacted communities.

Recommendations for the SFEIS:

1. Explain how community engagement will inform mitigation measures for unavoidable relocations, parcel acquisitions, and lost parking spaces. EPA recommends FTA consider creating a community advisory board consisting of representatives from each of the communities listed in Chapter 7, Environmental Justice and the Justice40 Initiative, to further this discussion.
2. Mitigation for proposed effects will likely require efforts past the construction phase. Discuss the method(s) FTA will pursue to continually engage the community in meaningful ways past the construction phase. To help ensure that community members are informed and have an equal opportunity to access the benefits of project mitigation, EPA recommends FTA consider designating a community ombudsman. This designee could be responsible for the following:
 - a) inform impacted community members of available programs and resources;
 - b) work with individuals to assist them in pursuing benefits and completing the necessary materials;
 - c) follow-up with individuals who are selected for benefits to ensure that they receive the benefits of the programs;
 - d) monitor and report the number of community members who utilize the programs;
 - e) monitor the amount and percentage of program resources utilized annually;

⁸ Black, Indigenous, and people of color

⁹ 40 CFR § 1505.3(b)

- f) ensure ongoing monitoring and compliance as described in the SFEIS and Record of Decision (ROD); and
 - g) maintain a line of communication between community members and FTA, the Council, and local municipalities.
3. On May 3, 2024, FHWA published final revisions to U.S. Department of Transportation's implementing rule on the Uniform Relocation Assistance and Real Property Acquisition Policies Act¹⁰ (Uniform Relocation Act). To comply with the final rule, real property acquisition phases begun on or after June 3, 2024, should ensure that planning documents and recipient policies and procedures related to the acquisition of real property, or the displacement of persons are updated to reflect the provisions found in the final rule. Indicate that the proposed Project will follow the most recent update of this Act.
 4. Discuss efforts to provide training and employment opportunities to community members who reside in the project area. Consider the Pilot Local Initiative¹¹ which allows FTA to use geographic, economic, or other hiring preferences. This program allows flexibility to promote equitable employment opportunities and workforce development, particularly for economic or socially disadvantaged workers.
 5. Create a chart for the FSEIS with proposed mitigation measures designed to offset unavoidable disproportionate effects to underserved communities with the corresponding entity(s) responsible for mitigation.
 6. Explain the method for documenting and monitoring mitigation measures.
 7. Create one chart with proposed commercial and residential parcel acquisitions (partial and full) and relocations as well as lost parking spaces for each community so reviewers can easily review these effects of the proposed Project (see chart at beginning of this section).

B. Chapter 3, Transportation, indicates effects are anticipated to the fixed-route bus service.

Recommendations for the SFEIS:

1. Short-term, construction-phase effects to bus operations are anticipated including temporary stop relocations or closures, route detours, or suspension of service on segments of routes as noted in Table 3-3, LRT Station Amenities and Connections to Local and Express Bus Service. Clarify which bus routes would be suspended and whether suspension would be temporary or permanent. This information should be part of the NEPA process, informing reviewers of the level of effects associated with the proposed project.
2. Analyze impact to users where routes will be suspended permanently (e.g., whether nearby routes exist, distance between existing and alternative routes, capacity for nearby buses to accommodate additional passengers, etc.).
3. Analyze the cumulative impact to riders from proposed permanent route suspensions.

¹⁰ <https://www.transit.dot.gov/funding/grants/grant-programs/capital-investments/dear-colleague-letter-uniform-relocation#:~:text=On%20May%203%2C%202024%2C%20the,be%20effective%20June%203%2C%202024>

¹¹ <https://media.metro.net/2021/FederalRegisterNotice-May21-2021.pdf>

4. The SDEIS indicates the Council would follow federal and local procedures for route modifications or suspension of transit service, which would include a Title VI analysis to determine how service changes would affect low-income population and BIPOC communities. Due to the nature of bus service planning, it is typical to conduct a Title VI analysis in advance of major service changes. The Council has codified procedures consistent with federal rules for when such an analysis is triggered, how the process is conducted, and how the results are shared with the public. However, the SDEIS states this work would be done at a future date when a final service plan is developed, likely 12 to 18 months before the start of operations. An impacts analysis focused on major bus service changes should be part of the NEPA process, informing reviewers of the level of effects associated with the proposed Project.
 5. Explain the process for community engagement to discuss changes to bus service. In particular, discuss communication with linguistically-isolated groups. Commit to include notices at the stations in languages other than English to ensure linguistically-isolated riders can easily use transit lines.
- C. Chapter 4, Community and Social Analysis, addresses the loss of private residential property and relocation assistance in accordance with the Uniform Relocation Act.

Recommendations for the SFEIS:

1. Discuss the relocation effort for residential relocations. In particular, discuss the method used to determine similarly-priced homes and/or apartments are available in the area. A community ombudsman could serve as coordinator for the relocation process.
2. Discuss how FTA will protect community cohesion through the relocation effort. In particular, consider working with property owners and residents who may be relocated to new locations that are consistent with existing community connections and services (e.g., churches, social clubs, schools, health clinics, etc.) with similar or better accessibility (e.g., walking, biking, bussing, driving, etc.).
3. Discuss how the following mitigation measures¹² can be adopted:
 - a) providing relocation assistance and translation services for residential (owners and renters) and non-residential displacements, and assigning a relocation consultant to provide one-on-one support and individualized assistance to meet the unique needs of each community member or family subject to relocation;
 - b) for residents interested in staying within their current community, committing to compensating individuals such that they can relocate to a different residence within their neighborhood;
 - c) providing educational sessions and other resources for residents to ensure they are properly informed regarding the relocation efforts, compensation programs and other services available, as well as resources on essential knowledge for homeowners to mitigate potential effects of gentrification in the future (e.g., handling property taxes, disputing valuations, etc.); and

¹²Memorandum of Understanding Between the Texas Department of Transportation and the City of Houston concerning the North Houston Highway Improvement Project https://www.houstontx.gov/planning/nhhp/docs_pdfs/NHHIP-TxDOT-COH-MOU-Executed-English.pdf

- d) committing additional funds to invest in local affordable housing initiatives in the affected municipalities.
4. Consider and explain how FTA can duplicate the Gordie Howe Bridge Bridging Neighborhoods Home Swap Program¹³ (Program) created in 2017 for residents directly affected by the construction of the New Gordie Howe International Bridge between Detroit, Michigan and Windsor, Canada. The Program provided residents with the option to exchange their current home for one in another neighborhood at no cost. This program was designed for homeowners in the project area who wanted to relocate but were not offered a buyout to do so.
 5. Discuss efforts to assist small businesses with relocation.
 6. Discuss efforts designed to help local businesses survive during the construction period. Consider and explain ways FTA can help small businesses, including:
 - a) duplicating the Los Angeles County Metropolitan Transportation Authority's small business mitigation programs: the Business Interruption Fund¹⁴ and Eat Shop Play program^{15,16}, which provided financial assistance to small "mom and pop" shops and free marketing assistances, respectively; and
 - b) inform and assist small businesses seek Small Business Administration loans – 7(a) loans¹⁷ and 504 loans¹⁸.
 7. Commit to working with community leaders to ensure linguistically-isolated community members are continually informed about relocations, mitigation opportunities, etc.
- D. Gentrification can be a result of transit or highway projects in areas that experience greater economic investment following project implementation. As property values and rent prices steadily rise, community members are often pushed out of their neighborhoods and unable to access the new economic, health, education, and environmental benefits brought about by the transit project. FTA, the Council, and Hennepin County officials have an opportunity to explore mitigation measures to reduce the possibility of gentrification.

Recommendations for the SFEIS:

1. Identify members of the community most at risk from gentrification (e.g., renters, senior citizens, those who cannot receive benefits due to their immigration status, etc.).
2. Establish partnerships (e.g., Council, Hennepin County, etc.) that can produce a comprehensive framework to identify investments that align with a community-based vision. The framework can:
 - a) identify displacement drivers;
 - b) address the supply of housing to ensure it meets current demand, anticipates future demand, and remains of good quality and reliance;

¹³ [Home Swap Program | City of Detroit \(detroitmi.gov\)](https://www.detroitmi.gov/home-swap-program)

¹⁴ <https://www.metro.net/about/business-interruption-fund/>

¹⁵ <https://www.metro.net/about/eat-shop-play/>

¹⁶ <https://thesource.metro.net/2022/03/30/metro-celebrates-closing-of-successful-construction-mitigation-programs-for-crenshaw-lax-line-first-two-segments-of-rail-line-are-substantially-complete/>

¹⁷ <https://www.sba.gov/funding-programs/loans/7a-loan>

¹⁸ <https://www.sba.gov/funding-programs/loans/504-loans#id-am-i-eligible->

- c) foster inclusive development, including access to high-quality job opportunities and training for existing residents;
- d) identify, recommend, and encourage adoption of new development incentives without displacement;
- e) engage developers to encourage development without displacement;
- f) identify areas with the community for protection and enhancement; and
- g) establish a comprehensive list of strategies that will engage the city and the community to work together to implement new incentives that avoid displacement.

3. **AIR QUALITY AND MITIGATION**

- A. The SDEIS indicates construction-phase increased emissions will be mitigated through best management practices (BMPs). Construction activity would release air emissions from equipment engines, truck engines, and earthwork activity. Emissions from construction and operation have the potential to impact human health, especially in sensitive populations (e.g., the elderly, children, and those with impaired respiratory systems). In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Diesel exhaust can also worsen heart and lung disease, especially in vulnerable populations, such as children and elderly people. However, the SDEIS does not include typical BMPs for transit projects.

Recommendations for the SFEIS:

1. Identify specific BMPs to reduce construction-phase emissions.
2. Commit to applicable measures from the enclosed *Construction Emission Control Checklist*.
3. Per Executive Order 13045 on Children's Health¹⁹, EPA recommends FTA pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations to be protective of children's health.
4. EPA recommends FTA assess the use of vegetative barriers²⁰ adjacent to neighborhoods to address the following:
 - a) Even though the proposed project includes electric, rather than diesel powered engines, particulates from brake wear are one source of traffic-related pollution. EPA research has demonstrated that well-planned vegetative barriers can reduce exposure to air pollution by up to 50 percent, and the combination of a solid fence with vegetation can result in the greatest protection.²¹

¹⁹ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed.

²⁰ Vegetative barriers are strategically-sited trees and shrubs, with rows preferably 3 meters tall and 4 meters thick, without any gaps in foliage between trees, running parallel to a roadway or rail lines. Use of coniferous tree species is critical because they keep their needles year-round.

²¹ Expressways generally influence air quality within 500-600 feet; it is therefore most important to assess sites for barriers where there are residences, schools, playgrounds, and other places people gather within 500-600 feet of a roadway. See EPA's Near Roadway Air Pollution and Health: Frequently Asked Questions https://www.epa.gov/sites/default/files/2015-11/documents/420f14044_0.pdf
EPA would appreciate the opportunity to collaborate with MnDOT and FHWA on siting considerations and identifying which studies would be useful references. See Baldauf, R. *Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality*. U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-16/072, 2016 at

- b) Chapter 4, Community and Social Analysis, analyzes visual and aesthetic effects of the proposed Project. To the extent feasible, Project facilities would be sited to avoid locations in proximity to residences, parks, or other sensitive visual receptors. However, where avoidance is not feasible, potential efforts to minimize visual intrusions could include screening using landscaping or walls.
- c) Stations would be designed to be aesthetically attractive and may incorporate landscaping and/or other built features such as walls or fencing to minimize visual intrusion as appropriate.

EPA understands the need for consistency with FTA requirements, including safety requirements, which could be addressed during barrier design. EPA would appreciate the opportunity to discuss use of vegetation to address the above issues. Please contact Kathy Kowal to connect with EPA scientists specializing in vegetative barriers for air quality benefits.

4. WATER QUALITY

- A. The SDEIS indicates the Build Alternative would impact approximately 12 acres of floodplain. As design advances, opportunities to minimize impact would be explored and replacement flood storage areas would be integrated into the landscape. However, effects of mitigating for 12 acres of floodplain impact were not included in the SDEIS.

Recommendations for the SFEIS:

1. Mitigation for all potential effects as a result of the proposed Project should be proposed in the SFEIS. Mitigation has the potential to cause an unrelated impact (e.g., effects to parcels) and should be analyzed along with direct construction-related effects such as residential and business displacement and loss of parking spaces.

5. THREATENED AND ENDANGERED SPECIES

- A. The Build Alternative would impact approximately 10 acres of forested habitat suitable for Northern Long-eared Bat and tricolored bats and about 50 acres of meadow/prairie habitat suitable for monarch butterflies. Forested habitat would also be suitable for nesting of various migratory bird species. Mitigation for these effects will be considered, including potential limitations on tree clearing timing to avoid nesting/roosting periods.

Recommendations for the SFEIS:

1. Effects to these species can be minimized by following tree removal limitations provided by U.S. Fish and Wildlife Service. Commit to remove trees during winter months as suggested by USFWS.
- B. Blanding's turtles, a state-listed endangered species, may be present in the Project area. Blanding's Turtles are more susceptible to road and rail mortality than other turtle species due

https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=NRMRL&dirEntryId=321772&simpleSearch=1&searchAll=Recommendations+for+constructing+roads+side+vegetation+barriers+to+improve+near+road+air+quality as well as the *Vegetation Barrier Toolkit* at <https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/>

to their long-distance movements.²² Areas known or suspected of supporting Blanding's Turtle populations should be managed to maintain suitable habitat.

Recommendations for the SFEIS:

1. Discuss minimization measures with the Minnesota Department of Natural Resources (MnDNR) (e.g., identify travel corridors, commit to placing silt fencing to prevent turtles from entering construction areas, create flyers with an illustration of a Blanding's turtle for all contractors working in the area, consider culverts under rail lines between wetland areas or wetland and nesting areas, etc.)²³
2. Commit to all minimization measures provided by the MnDNR.

6. ENVIRONMENTAL EFFECTS

- A. The SDEIS indicates karst may be found in Minneapolis between Lowry and Knox Avenue. Using heavy equipment can damage shallow karst features in the landscape. The calcareous rock associated with porous karst can fracture when subjected to physical stresses. However, the SDEIS does not describe potential impact or typical BMPs for working in karst areas.

Recommendations for the SFEIS:

1. EPA recommends the SDEIS clarify whether karst geology exists at the project area. The SDEIS should identify and discuss issues associated with the construction and operation of the proposed Project in karst terrain (e.g., a discussion of the potential effects to surface water quality and/or ground water quality associated with hazardous material spills).
2. Discuss why the proposed project cannot avoid karst features.
3. The identification and implementation of construction and stormwater-related BMPs for a karst environment is extremely important because of the physical and environmental sensitivity of karst features, flora, and fauna. If karst cannot be avoided, EPA recommends FTA commit to the following BMPs in karst areas, as applicable:
 - a) All surface water runoff from the proposed project should be directed away from sensitive karst features. Spill prevention, control and countermeasure plans should be developed and included in the SFEIS.
 - b) A buffer of undisturbed veg at least 25' wide around the highest contour of all sinkholes in all areas which are not directly in the footprint of new construction should be maintained.
 - c) All areas affected by construction shall be mulched and seeded as soon as possible following construction. Interim measures to prevent erosion during construction shall be taken and may include the installation of silt fences, staked straw bales, sedimentation basins, and temporary mulching.

²² <https://naturalheritage.illinois.gov/content/dam/soi/en/web/naturalheritage/speciesconservation/speciesguidance/documents/blandings-turtle-guidance-idnr-final.pdf>

²³ <https://mn.gov/eera/web/project-file?legacyPath=/opt/documents/32989/Appendix%20B.%20MnDNR%20Factsheets.pdf>

7. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

- A. Energy efficient design and material selection could reduce construction and operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy. With a project of this magnitude, multiple opportunities exist to reduce environmental effects.

Recommendations for the SFEIS:

1. Consider committing to the following:

- a) Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for new stations associated with the Project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion-sensored lighting, solar or wind power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages FTA to commit to analyze the strengths and feasibility of these strategies.
- b) Constructing proposed park-and-ride facilities, sidewalks, pedestrian bridges, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff.
- c) Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens.
- d) Discussing to what extent FTA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 13693.
- e) Incorporating electric vehicle charging stations in park-and-ride areas and designating priority parking spots for carpools and low emission vehicles.
- f) Committing to recycle a high percentage of construction and demolition debris.
- g) Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;” and
 - Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill.
- h) Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

8. CONSTRUCTION EFFECTS

- A. The SDEIS indicates mitigation options such as locating staging areas in places where visibility effects would be minimal, minimizing the need to remove vegetation to accommodate construction, shielding light sources used in nighttime construction, and restoring areas disturbed during construction could be included in project commitments.

Recommendations for the SFEIS:

1. Commit to including all mitigation options found in the SDEIS.
 2. Compile all mitigation in a single 'green sheet' in the SFEIS with telephone numbers stakeholders can use if mitigation is not followed.
 3. Describe the potential extent of nighttime construction in residential areas as well as noise and visual mitigation that will be employed to reduce overnight effects to the greatest extent practicable.
 4. Describe the planned communication strategy for notifying residents and businesses about noise and disruption from the proposed action.
- B. Chapter 4, Community and Social Analysis, indicates mitigation measures for short-term effects to community amenities would be identified in the Construction Mitigation Plan and Construction Communication Plan, which would be developed as the Project advances to construction. This same chapter indicates *"While these larger geographic areas would experience overall growth and the associated benefits from this growth, the study area contains numerous smaller geographies with varying socioeconomic conditions. As Project planning progresses and additional details become available, specific information on the socioeconomic conditions within these sub-geographic areas that would be affected by the transportation facility would be updated. Developing a more detailed understanding of the socioeconomic conditions would allow for a more robust analysis of the overall impacts of the Project. In general, the greater amount of accurate and detailed information would lead to more accurate and reliable estimates of the potential economic impacts of the Project."* The SDEIS does not explain why mitigation plans and detailed economic impact analyses would be developed after the NEPA process, when the public cannot review and provide input.

Recommendations for the SFEIS:

1. Develop the Construction Mitigation Plan and Construction Communication Plan for the SFEIS. At a minimum, provide typical mitigation measures associated with transit projects to inform reviewers of possible mitigation and effects that will not be mitigated.
2. Provide updated socioeconomic data regarding the "sub-geographic areas" referred to above, as well as updated estimates of potential economic effects. Discuss what these effects mean for the well-being of the "sub-geographic areas."

9. NOISE AND VIBRATION

- A. The Build Alternative would result in moderate noise effects at two institutions and 29 residential properties (244 dwelling units), the majority (18 residences with 211 dwelling units) of which would be in the City of Minneapolis. Severe effects would result at 15 properties

(173 dwelling units), all within the City of Minneapolis. Noise effects have the potential to impact human health, especially in sensitive populations (e.g., children²⁴). Executive Order 13045, “Protection of Children from Environmental Health Risks and Safety Risks,” directs Federal agencies to identify and assess environmental health and safety risks that may disproportionately affect children and to ensure that activities address those safety risks. Children’s hearing, speech, and ability to learn can be affected.

Recommendations for the SFEIS:

1. Commit to noise mitigation methods included in Sections 7.1.2 and 7.2.3 to reduce effects from construction and operation.
2. Recommend FTA provide a method by which residents can request a noise and/or vibration analysis within one year of full operation of the proposed project with appropriate mitigation, as applicable.
3. Commit to noise mitigation for all schools in the project area within a distance of 50 feet, per the construction noise assessment methodology in Chapter 4. Consider mitigating noise for all schools within 100 feet of the project.

10. CUMULATIVE EFFECTS

- A. EPA acknowledges the history of disproportionate effects included in Chapter 7 of the SDEIS. In addition to past effects and those from the proposed Project, gentrification would increase the disproportionate effect of the Project on the underserved communities in the Project area. FTA has an opportunity to explore mitigation measures to reduce the possibility of gentrification.

Recommendations for the Draft EA:

1. Analyze the cumulative impact from past actions in relation to the proposed Project. In particular, consider the potential effects of gentrification as seen with other transit projects.
 2. Ensure mitigation measures reflect full consideration of historic effects faced by the community. For example, the loss of community benefits, effects to community cohesion, relocations, inability to move to certain areas, etc. from past projects, in addition to the possibility that gentrification will once again displace residents, should be analyzed.
- B. The SDEIS references the Blue Line Extension Anti-Displacement Recommendations Report²⁵ (Report). While we commend the work of the Anti-Displacement Work Group (Work Group), the recommendations found in the Report are not protective because they are not implementable actions. It is unclear how these recommendations can be implemented thru direct action.

Recommendations for the Draft EA:

1. Discuss next steps by the Work Group to create and implement the recommended policies to protect the community (e.g., mandatory relocation assistance policy, limiting

²⁴ https://www.epa.gov/sites/default/files/2015-07/documents/ochp_noise_fs_rev1.pdf

²⁵ [Building prosperity, preventing displacement | Your Blue Line](#)

investor purchasing/corporate ownership, land disposition, rent stabilization, etc.). Without definitive policies to address displacement, gentrification may be a cumulative impact of the proposed project.

2. Discuss which entity(s) would be responsible for implementing the recommendations described in the Report. The previously-suggested ombudsman would be a suitable entity to ensure anti-displacement policies are being upheld after construction is completed and the full scope of the economic effects of the transit project is realized.
3. Until Report policies can be created, describe specific actions will be provided to protect residents, particularly renters, from suffering the effects of socioeconomic change as a result of the proposed transit project.

11. INTERAGENCY COORDINATION

- A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including Federal and state resource agencies, Tribes, local governments, and affected landowners.

Recommendations for the Draft EA:

1. Include copies of all interagency coordination sent to, and received from Federal and state resource agencies, Tribes, and local municipalities.
2. Include a list of all Federal, state, and local permits that would be required to undertake the Preferred Alternative.

12. OTHER COMMENTS

- A. The SDEIS did not indicate how comments received during the public comment period would be responded to by FTA in the SFEIS.

Recommendations for the SFEIS:

1. Create an appendix that include all comments received during the SDEIS comment period, including any applicable transcripts of comments from the public.
2. Create an appendix that includes all correspondence sent to and received from government agencies regarding the proposed project.
3. Create a chart that lists the following:
 - a) all comments received during the SDEIS review period;
 - b) FTA's response with a reference to the section that was changed as a result of the comment, if applicable. Include section and page number for ease of reference; and
 - c) associated mitigation efforts with responsible entity.

U.S. Environmental Protection Agency **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.²⁶ We recommend FTA consider the following protective measures and commit to applicable measures in the SDEIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²⁷
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).²⁸
- Locomotives: Locomotives servicing infrastructure sites should meet, or exceed, the EPA Tier 4 exhaust emissions standards for line-haul and switch locomotive engines where possible.²⁹
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

²⁶ Benbrahim-Tallaa, L, Baan, RA, Grosse, Y, Lauby-Secretan, B, El Ghissassi, F, Bouvard, V, Guha, N, Loomis, D, Straif, K & International Agency for Research on Cancer Monograph Working Group (2012). Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. The Lancet. Oncology, vol. 13, no. 7, pp. 663-4. Accessed online from: https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim_Tallaa_2012_Lancet_Oncology.pdf

²⁷ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

²⁸ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

²⁹ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health,³⁰ EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.
- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

³⁰ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.



4141 Douglas Drive North • Crystal, Minnesota 55422-1696

Tel: (763) 531-1000 • Fax: (763) 531-1188 • www.crystalmn.gov

August 2, 2024

Nick Thompson
Interim Project Director
METRO Blue Line Extension
6465 Wayzata Blvd #500
St Louis Park, MN 55426

Subject: City of Crystal comments on Supplemental Draft Environmental Impact Statement for the METRO Blue Line Extension

Dear Mr. Thompson:

Thank you for the opportunity to provide comments on the Supplemental Draft Environmental Impact Statement ("SDEIS") for the METRO Blue Line Extension ("the project").

The city's comments concern the following subjects:

1. Vehicular traffic
2. Parking
3. Noise
4. Visual impact of interchange
5. JWC water supply through Robbinsdale
6. Stormwater facilities
7. Public safety

1. Vehicular Traffic

- a. The SDEIS conclusions are based on the 2040 forecast, which is flawed.
 - Actual 2023 volumes exceed the 2040 forecast volumes in the Bass Lake Road-Wilshire Blvd. segment
 - Actual 2023 volumes have reached the 2040 forecast volumes in the 47th-Hwy 100 ramps segment.

- The 2040 forecast shows a higher volume on Bottineau Blvd. north of Bass Lake Road than south of Bass Lake Road, which is contrary to the historical and current reality.
 - City staff have repeatedly expressed concerns to project staff about the 2040 forecast and whether it should be used as a basis for concluding that Bottineau Blvd. would function adequately and safely with four lanes instead of six.
 - The forecast, model, and simulation need to be updated, recalibrated, and revised. Only then can the project's impact on vehicular traffic be correctly evaluated.
- b. The SDEIS does not specifically evaluate the traffic shift from Bottineau Blvd. to West Broadway due to the lane reduction on Bottineau.
- This need is supported by the future diversion of 1,000 AADT from Bottineau Blvd. to the parallel segment of West Broadway in the no-build forecast.
 - It is likely that this diversion will be greater due to the project and its reduction of lanes on Bottineau Blvd. from six lanes to four.
 - The city is concerned about diversion of traffic from an existing high-speed limited access road to a low-speed road of substandard condition and configuration as described in the City Council's July 16, 2024, letter to the project.
 - The traffic shift needs to be specifically evaluated in the revised forecast, model, and simulation. Only then can the project's impact on West Broadway be correctly evaluated.
- c. The SDEIS does not evaluate cross-street delays.
- The SDEIS states that all intersections in Crystal would operate at or below capacity but does not break out the level of service for each approach, the signal phasing and timing assumptions, or how they compare to current settings at each of the intersections.
 - Project staff have acknowledged that Bass Lake Road delays would increase substantially due to the proposed interchange.
 - This is especially concerning due to the prospect of the county potentially increasing cross-street delays as a way to "solve" delays on Bottineau if they worsen over time.
 - The cross-street delays and signal phasing/timing assumptions need to be included in the SDEIS. Only then can the project's impact on cross streets be correctly evaluated.
- d. The SDEIS does not specifically evaluate the impact of the lane reduction on the existing southbound queuing problem north of the 47th Avenue signal.
- Existing backups during the a.m. peak typically extend to 50th Avenue and occasionally extend through the Corvallis intersection. And this is with three southbound lanes.
 - The project proposes to eliminate the third southbound lane except for a short segment from Lakeside to 47th Avenues which is approximately half the length of the existing a.m. peak queue.
 - It is a reasonable assumption that the project's significant reduction of road space will cause the southbound queues to extend further north and occur more frequently than in the existing condition.

- Due to the proposed interchange at Bass Lake Road, southbound traffic will be transitioning from a wide-open, freeway-style, 1½ mile long segment south of 63rd Ave. to traffic signals with congestion and queues.
- Southbound traffic would be cresting the bridge over the CPKC when it would first see the slowed or stopped queue, with little time to react. Having a third lane start just 1,000 feet north of 47th does not address this real-world traffic safety problem.
- The SDEIS must specifically evaluate the southbound queuing problem. Only then can the project's impact on traffic movement and safety be correctly evaluated.

2. Parking

The SDEIS claims a loss of only 7 off-street parking spaces at Crystal Business Commons (5500 Lakeland).

- This may have been based on an earlier plan to move the Adair cul-de-sac onto the existing private stormwater pond and use public right of way for private parking.
- The project is now proposing to keep the Adair cul-de-sac basically where it is today, which would mean the elimination of a lot more than 7 spaces.
- The SDEIS needs to quantify and evaluate the effects of the most recent plan on Crystal Business Commons and any other private property. Only then can the impacts on parking be correctly evaluated.

3. Noise

The SDEIS concludes that four homes and 14 apartment units would be moderately impacted by noise, and none would be severely impacted.

- The noise model was developed using noise measurements at 5906 Elmhurst Ave. N. and 5257 Xenia Ave. N. 5906 Elmhurst is 215 feet from the proposed LRT guideway. 5257 Xenia is 195 feet from the proposed LRT guideway, buffered by a concrete wall and opaque fence, and located at a lower elevation. Neither property is among the closest homes to the project.
- The most directly impacted residential neighborhood is between Corvallis Ave. N. and 47th Ave. N. where multiple residences are within 100 feet of the proposed LRT guideway.
- The noise model needs to be revised so that it includes at least one actual measurement location in the area of greatest potential impact such as one of the single-family homes adjacent to Bottineau Blvd. in the vicinity of 48th-50th Avenues. Only then can the noise impacts of the project be correctly evaluated.

4. Visual Impact

The SDEIS acknowledges that the intersection of Bottineau Blvd. and Bass Lake Road is a location of high visual sensitivity but concludes that the visual impact of the proposed interchange is neutral.

- The visualizations in the SDEIS (KVP-07 and KVP-08) directly and obviously contradict this conclusion.
- The proposed interchange would be a radical change to the visual landscape due to the bridges being visible from a wide area including adjacent residential neighborhoods.
- The correct conclusion is that the project will create an adverse visual impact in this location.

5. Joint Water Commission pipeline through Robbinsdale

The SDEIS does not discuss the potential impacts and risks to this water supply pipeline which serves 70,000 people in Crystal, New Hope, and Golden Valley.

- The SDEIS treats this piece of critical infrastructure as merely another “utility crossing,” as if it’s no more important than a regular water main serving a single block.
- These risks include not only construction disruption or damage, but also difficulty of access for long-term maintenance.
- The SDEIS needs to specifically evaluate the risks related to the JWC water supply pipeline.

6. Stormwater

The SDEIS states that additional stormwater facilities will be needed due to increased impervious surface but does not evaluate the location and impacts of those facilities.

- The project team has indicated that they are looking at land outside the existing roadway footprint, currently used as landscape buffers, as locations for the additional stormwater facilities.
- This would remove some of the limited screening and buffering that exists today and would negatively impact visual quality, noise, and so forth.
- The SDEIS needs to evaluate these impacts.

7. Public Safety

The SDEIS does not evaluate the impact of the project on public safety in general and local law enforcement agencies in particular. The SDEIS merely lists those agencies and the broad categories or services they provide.

- The city is likely to see increased demand for police services based on the known reality of what happens at LRT stations in other jurisdictions.
- Even a fully-staffed Metro Transit Police Dept. would frequently be delayed and sometimes totally unavailable, causing the Crystal Police Dept. to be the first responding agency at the Bass Lake Road station.
- The SDEIS needs to evaluate the public safety impacts including the increased demand for services from local first responders. Only then can the impacts on public safety be correctly evaluated.

The City appreciates this opportunity to comment on the Supplemental Draft Environmental Impact Statement. Please feel free to contact me at 763.531.1140 or adam.bell@crystallmn.gov with any questions. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'ABell', written in a cursive style.

Adam R. Bell
City Manager

cc: Charlie Zelle, Chair, Corridor Management Committee, METRO Blue Line Extension
Commissioner Jeff Lunde, Hennepin County Board, District 1
Council Member Anjuli Cameron, Metropolitan Council, District 8



City of Brooklyn Park
City Hall
5200 85th Ave. N.
Brooklyn Park, MN 55443
763-424-8000
www.brooklynpark.org

August 5, 2024

Chair Charlie Zelle
Metropolitan Council
390 Robert Street North
Saint Paul, MN 55101

RE: City of Brooklyn Park comments on the METRO Blue Line Extension Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Chair Zelle:

Thank you for the opportunity to review and comment on the METRO Blue Line Extension Supplemental Draft Environmental Impact Statement (SDEIS). The release of this document is an important milestone, documenting the anticipated benefits and impacts of the reconfigured project along with proposed mitigation measures. Because the updated project alignment in Brooklyn Park is so similar to the previously documented project, the content of the SDEIS generally matches our expectations. However, as we move closer to the municipal consent process, we do have a few comments that we would like to communicate.

Anti-displacement

The SDEIS makes it clear that the project will have a greater impact on Environmental Justice communities than the population as a whole. Given that context, it is especially important that strategies for ensuring shared benefit are a core commitment of the project.

The SDEIS documents the recommendations of the Anti-Displacement Working Group, indicating that additional work is necessary to refine the working group recommendations into mitigation measures for inclusion in the forthcoming Supplemental Final EIS (Section 7.4.2.6, Indirect and Cumulative Effects). While ideally this work would be complete and mitigation measures proposed in this SDEIS document, we look forward to working with Metro Transit, Hennepin County, the other corridor cities, and the Anti-Displacement Community Prosperity Board to ensure that the project makes a strong commitment to these strategies.

East-West Bus Connections

The City of Brooklyn Park has previously communicated the importance of identifying and implementing east-west bus routes that connect to each of the five planned stations in our city. We understand that Metro Transit will conduct a future study to plan connecting bus routes, but we believe there is some urgency to complete this work so that final engineering can take into account the facilities necessary to serve bus riders. Section 3.1 of the SDEIS, which analyzes travel demand modeling and ridership forecasts for the project, assumes that the future stations will be served only by existing bus routes in Brooklyn Park. We reiterate here our request that opening day connecting bus routes be planned earlier in the process.

Design

City staff have been working closely with the project office on design details emanating from the 2022 route modification. Following are design-related comments in the context of the SDEIS:

63rd Avenue Station – The SDEIS is based on conceptual engineering drawings from September 2023. Since that time, the project office has refined the design at the 63rd Avenue Station to improve pedestrian safety at the intersection. Those improvements are reflected on the updated plans released in March 2024. The Final Supplemental EIS should include those improvements as well, including documentation of the additional benefit to pedestrian safety.

Oak Grove Station Area – Earlier in the design process, MNDOT and the project office committed to including accommodations for an east-west street in the northwest quadrant of West Broadway and Highway 610 to serve new development, known as the “fourth leg.” This connection is critical to realizing the vision of the station area plan for high quality mixed-use development, and it must be included in the final project design and Final Supplemental EIS. City staff are also working with the project office on rethinking the siting of the park and ride to better facilitate transit oriented development. This likely does not impact the environmental documentation, but final plans should reflect this change.

Sidewalk Connections – The City of Brooklyn Park intends to implement sidewalk connections along critical roadway segments to and from our station sites. We have applied for Federal funding via the regional solicitation process and are optimistic that the request will be funded. The City requests that the portions of these segments that are within the METRO Blue Line Extension project construction limits be constructed as part of the project.

The City of Brooklyn Park continues to prepare for opening day of the Blue Line Extension and is making proactive investments to ensure that the project contributes to the prosperity of our community and the northwest area of the region. We appreciate the partnership of the Metropolitan Council and Hennepin County and look forward to the next steps in the process.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Hollies Winston', written in a cursive style.

Hollies Winston
Mayor of Brooklyn Park



Minneapolis
Park & Recreation Board

Administrative Offices
2117 West River Road North
Minneapolis, MN 55411-2227

Northside Operations Center
4022 1/2 North Washington Avenue
Minneapolis, MN 55412-1742

Southside Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax
612-230-6500

www.minneapolis-parks.org

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Meg Forney

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Steffanie Musich
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Charles Rucker
Elizabeth Shaffer
Becka Thompson

Superintendent
Al Bangoura

Secretary to the Board
Jennfier B. Ringold

August 12, 2024

METRO Blue Line Extension
Blue Line Extension Project Office
Park Place West Building, Suite 600
6465 Wayzata Boulevard
St. Louis Park, MN 55426

RE: Minneapolis Park and Recreation Board Comments on the Blue Line Extension
Supplemental Draft Environmental Impact Statement

Project sponsor Metro Transit and lead federal agency The Federal Transit Administration (FTA) have issued a Supplemental Draft Environmental Impact Statement (SDEIS) for the METRO Blue Line Light Rail Extension Project (Project). The project has been considered for some decades, with consistent and ongoing consultation and collaboration from local governments including the Minneapolis Park and Recreation Board (MPRB). The Project is currently envisioned to link downtown Minneapolis with northwestern suburbs via Washington Avenue and Broadway Avenue in north Minneapolis. This route passes near and through several park sites owned and operated by MPRB, and as such MPRB has a public responsibility to comment on the SDEIS. Such commentary is not the only opportunity for MPRB to formally affect the project, but it represents a key milestone in project planning and an important moment in park advocacy.

The purpose of the SDEIS, according to the document itself, is to “evaluate impacts from the modified alignment, in contrast to the 2016 Alignment and identify the potential for impacts to arise....” MPRB did comment on the previous alignment and also concurred with FTA’s finding under Section 4(f) of the Transportation Act of 1966 that there would be a *de minimis* impact on parkland, once mitigation efforts were taken into account. Though portions of the overall current alignment, approved by the Corridor Management Committee in 2022, are similar to that described in the 2016 environmental documents, the Minneapolis portion is fundamentally different. Therefore, MPRB must view this SDEIS as completely new and must comment accordingly.

Above all, MPRB strongly stresses that it wants to continue collaborating with the Project to ensure A) that Minneapolis residents, workers, and visitors are able to easily connect to parks via transit; and B) that transit improvements do not adversely impact the very park resources people have enjoyed for generations and which will be enjoyed for generations to come. MPRB’s mission strongly states that MPRB permanently preserves, protects, maintains, improves, and enhances its natural resources, parkland, and recreational opportunities for current and future generations of our region, including people, plants, and wildlife. This is the primary guidance MPRB will follow throughout this comment letter and the overall Project process.

Several strategies in Parks for All, the Minneapolis Park and Recreation Board Comprehensive plan 2021-2036, recognize the importance of park-transit interconnections, including:

- Goal 4, Strategy 8: Create system-wide connections to and through parks for pedestrians, cyclists, and transit riders based on park plans and in collaboration with agency partners
- Goal 5, Strategy 3: Support year-round, multi-modal, vehicular, non-motorized, and shared mobility options that create safe recreation and commuter access to and through parks and the Grand Rounds, through infrastructure, filling trail gaps, traffic calming, maintenance, promotion, crash reduction, and education on trail protocols.

Several Parks for All strategies prioritize benefit to the recreating public and natural resources:

- Goal 2, Strategy 1: Prioritize preservation of historic, cultural, and scenic resources with protection of natural resources and contemporary recreational needs in park management, design, implementation, interpretation, and development decisions.
- Goal 3, Strategy 2: Care for existing historic and cultural resources, public art, and the memorial collection through planning, staffing, inventory, management, and conservation.

Guided by this policy direction, MPRB wishes to comment on the Project's SDEIS, with specific focus on the project's potential impact on parks, recreation, natural resources, and connections between these things and the people of the region. MPRB's comments are tabulated in three ways:

- This "**main letter**" offers a narrative response to the SDEIS, organized around four main THEMES:
 - A. FTA's Section 4(f) determination
 - B. Design of the Lowry Station area, which is planned to exist within MPRB parkland
 - C. Land ownership and jurisdiction
 - D. Pedestrian/bicycle access to parks around Broadway Avenue
- An attached "**comment tabulation**," which is a page-by-page list of comments on document topics of interest to MPRB. Some comments therein are linked to theme areas in the main letter, while others are not specifically discussed in the main letter but should nevertheless be considered important concerns to MPRB.
- **Board Resolution 2024-138**, approved on August 7, 2024, which takes a strong position on the at-grade crossing of light rail over the Minneapolis Grand Rounds.

Together, these three items are MPRB's official response to the Project's SDEIS.

Before discussing the four main themes, MPRB would like to briefly provide comment and/or context on several other overarching topics:

- The 4(f) park resource near the Lowry Station area is consistently misnamed in project documentation. Though there are two different parkway "segments" of the Grand Rounds Historic District in this area, the parkland itself is one single park called Wirth/Victory Memorial Parkway Regional Trail. This is the nomenclature MPRB uses, and it follows the Metropolitan Council's naming of this part of the regional system.
- It appears there may be some inadvertent references to an elevated light rail bridge and/or station at the Lowry Station Area. MPRB's understanding is that the "flyover" option is no longer being considered, so these references should be removed from descriptions of the Build Option.
- There is little to no narrative about impacts to the urban forest. As steward of Minneapolis's public forest, MPRB would like to see more detailed information on street tree impacts and potential mitigations as the project progresses.

THEME A: FTA's Section 4(f) determination

With regard to Wirth/Victory Memorial Parkway Regional Trail and the Grand Rounds Historic District, two 4(f) resources under MPRB's jurisdiction, the meaning of the 4(f) determination throughout the document is unclear, misleading, and includes multiple discrepancies. The Executive Summary, the entirety of Chapter 8, and portions of Appendix 8 say that a preliminary determination has been made. Table 8-1 notes that 4(f) "mitigation not required; impacts are *de minimis*." However, in Section 8.9 of Appendix 8 (not to be confused with Chapter 8), regarding both park resources it is said that "at this time FTA cannot make a preliminary determination...; additional coordination with the Official with Jurisdiction [MPRB] is necessary." These statements are in direct contradiction and should have been corrected prior to or immediately subsequent to the release of the SDEIS.

To get clarification, MPRB staff met with Project staff and were told that in fact NO determination has yet been made. FTA would like to stay on the pathway toward *de minimis*, but expects to work with MPRB further before that determination is made. MPRB staff shared that the SDEIS is confusing and at times inaccurate on this issue and requested that a clarification or addendum be immediately issued. Project staff have reported that FTA refuses to clarify the language in the SDEIS around 4(f). Project staff attempted to clarify this discrepancy when presenting before the Board of Commissioners on July 10, 2024. However, the fact remains that the SDEIS itself—on which this letter specifically comments—is contradictory and unclear.

MPRB is frustrated that this policy direction cannot be consistently explained in plain language, and would formally request again that FTA's and the Project's position on 4(f) be clarified as expediently as possible.

That said, if the language in Appendix 8, Section 8.9 is in fact correct, MPRB believes this is the appropriate approach. MPRB will need to better understand specific park impacts and proposed mitigations prior to considering concurrence with any 4(f) pathway. It is far too early to make a 4(f) determination now, with regard to effects on recreational, scenic, environmental, and historic aspects of the MPRB owned resources. We agree that a final determination can only happen through "additional coordination," which may also include design revisions (see THEME B), provision of additional and more detailed impact data, and comprehensive land ownership discussions (see THEME C).

THEME B: Design of the Lowry Station Area

The most significant impacts to parkland will take place within Wirth/Victory Memorial Parkway Regional Trail, which is part of the National Register-eligible Grand Rounds and the Victory Memorial Parkway State Historic District. The interaction between the Lowry Station area and this critical park resource has been the subject of extensive design exploration and is admittedly a complicated, multi-level parkland and transportation amalgam. An early design for the station and track routing through this area featured a major flyover of the entire park area and an elevated station. This would have had significant impacts on park vegetation, would have added a major piece of transportation infrastructure to the park, and would have created a likely unsafe and undesirable elevated transit connection to the Grand Rounds. MPRB staff worked with Project staff to develop and review alternative designs, which led to the current Build Alternative.

MPRB appreciates the elimination of the flyover alternative from consideration, and acknowledges the work that Project and MPRB staff have expended on creating new designs for this complicated area. There are some significant positive attributes of the proposed design, many of which are described in the SDEIS:

- The location of the station at grade creates direct connections between light rail transit and the park system, something that is rare in Minneapolis but generally welcomed.
- The addition of the “slip ramp” from southbound Bottineau Blvd (County Road 81) to Lowry Avenue will likely reduce vehicle (and especially truck) traffic on Wirth Parkway, part of which is currently used as a county highway interchange.
- The design moves the intersection of Lowry Avenue and the Parkways out from under the Broadway bridges, increasing sight lines and safety for all park travel modes.
- The design preserves and potentially opens up the vista northward onto Victory Memorial Parkway, though additional analysis is requested on this topic (see comment #30 requesting an additional Key Viewpoint be examined).
- Because the current design proposes significant changes in the vicinity, this could be an opportunity to “right-size” roadways and other pavements, potentially eliminating unnecessary lanes, narrowing roadways, and returning more space to pervious surfaces such as green space and habitat areas.

However, one primary potential park impact that is not adequately documented in the SDEIS is the at-grade crossing of light rail over the Parkway and associated pedestrian and bicycle trails. According to Resolution 2024-138 (attached) MPRB believes this at-grade crossing to be “inimical to the recreational, parkland, park use, and historical and landscape value of MPRB’s property....” MPRB opposes the current plan and requests that the project office develop additional design alternatives to separate the light rail and parkway routes, along with further examination of impacts of all design options.

In order to better understand the impact on parks and the recreating public, MPRB requests the following, relative to the current data provided in the SDEIS:

- 1) More detailed information on the location of rail crossing gates and operation of intersections;
- 2) A detailed analysis of the frequency and duration of train crossings, taking into account the slowing of trains near the station, during all times of day, along with resultant traffic and access impacts to the Parkway, surrounding streets, and North Memorial Hospital;
- 3) A physical model of the station area, to facilitate understanding of the three-dimensional nature of the area and the interrelationships between modes;
- 4) Experiential digital fly-through videos for the vehicular and pedestrian/bicycle modes showing real-time impacts of waiting for trains at light rail crossings;
- 5) The amounts of impervious surfacing of each of the explored and analyzed design options, relative to existing conditions within the station area, with such analysis including all existing and proposed roadways, Parkways, trails, platforms, trackage, and light rail support infrastructure;
- 6) Historical safety and incident data from Minneapolis and other comparable cities addressing pedestrian and bicycle interaction at light rail crossings;
- 7) Additional design alternatives that seek to eliminate the at-grade crossing of the Parkway and associated trails, potentially including a light rail tunnel, a light rail trench, light rail tracks and station at the elevation of the Broadway Bridges, and Parkway and/or trail underpasses;
- 8) Full examination of items 1-5 as they relate to additional design options explored in item 7;
- 9) A clear description of maintenance responsibilities for and in the vicinity of the station, tracks, and other project elements that could exist on parkland, so that MPRB has a clearer picture of potential maintenance and operational impacts of the proposed designs; and

In essence, while MPRB appreciates the design advancement made to date, it feels that not enough data nor exploration is included in the SDEIS to accurately reflect potential park impacts, examine alternatives, and determine appropriate mitigation.

THEME C: Land Ownership and Jurisdiction

MPRB is a legacy land steward charged with acquiring, protecting, improving, and maintaining parkland for Minneapolis residents, workers, visitors, plants, and wildlife. The Project has affirmed that MPRB is the owner of lands and the Official with Jurisdiction (OWJ) over lands called Wirth/Victory Memorial Parkway Regional Trail, through which the trails and parkway of the historic Grand Rounds travel. The Grand Rounds makes Minneapolis unique among American cities. Originally envisioned in the 1880s by landscape architect Horace W.S. Cleveland, the Grand Rounds has been largely implemented. The remaining gaps, on the upper Mississippi River and in northeast and southeast Minneapolis, are critical improvement areas for MPRB, with multiple projects underway. For the vast majority of its length, the Grand Rounds parkway and trail system exists on land owned and operated by MPRB, including in the area of greatest project impact: near the Lowry Station area.

Wirth/Victory Memorial Parkway is subject to an easement “for highway purposes” conveyed by MPRB to the State of Minnesota in 1962, and later re-conveyed by the Minnesota Department of Transportation to Hennepin County. The easement encompasses not just portions of County Roads 81 (Broadway Avenue) and 153 (Lowry Avenue), but also a portion of Wirth Parkway necessary for vehicular interconnection between CR 81 and 153.

Two primary land ownership and jurisdiction issues exist in the Lowry Station area, neither of which are adequately addressed in the SDEIS.

First, according to the Memorandum dated July 4, 2024, and prepared by Patrick B. Steinhoff of Malkerson Gunn Martin, LLP, MPRB opposes the idea that the presence of an “easement for trunk highway purposes” allows the Project a fundamental right to build a light rail line across parkland. MPRB asserts that transit use of this corridor will require, per the Memorandum, “an amendment of the existing easement or condemnation of additional easement rights....” In light of these facts, MPRB requests:

- Any proposed project elements within the existing easement be considered transportation improvements on parkland, rather than a perspective like that on Page 48 of Appendix 8, which seems to suggest that improvements constructed within the easement will have no park impacts, which is incorrect because the underlying land is still parkland, whether encumbered or not.
- A commitment from the Project, potentially as mitigation, to reduce the size of the easement at the conclusion of the project, in recognition of different needs for the Country roadway system, thereby returning useable parkland to the public.

Second, MPRB is strongly opposed to relocating a portion of the Grand Rounds parkway off of MPRB-owned lands. Admittedly, as new park connections are being made elsewhere to fill historic gaps in the Grand Rounds system, MPRB is working with partners to both acquire land and make agreements to operate recreational facilities on the lands of other jurisdictions. MPRB also acknowledges that outside-the-box thinking here is important to arrive at the best possible design for the public, regardless of current land ownership. However, in this case, the parkway currently exists on MPRB fee title land and must continue to do so. MPRB therefore requests:

- The SDEIS should consistently discuss the impact of removing the Grand Rounds parkway from MPRB fee title lands, which can then open the doorway for specific mitigation efforts, should the current concept advance. This reality is mentioned on Page 69 of Appendix 8, but nowhere else in the document. The SDEIS needs to address Grand Rounds property jurisdiction as a project impact.
- A commitment from the Project to ensure any future Parkway corridor—consisting of pedestrian and bicycle trails, a vehicular parkway, and ample associated open space—can exist on MPRB fee title owned lands, whether or not encumbered by other easements. As is currently the case with Wirth/Victory,

MPRB is the underlying and primary fee title land owner, with other easements conferring rights atop that MPRB ownership. This must be the outcome of any new parkway corridor.

- A commitment from the project office that it will bear all costs and perform all due diligence to acquire base fee title property ownership to all new Parkway corridor parcels, and that it will transfer fee title ownership to MPRB as mitigation for any relocation of the Parkway off MPRB lands. MPRB understands that transportation easements of various types may still be necessary to allow county roads and the light rail corridor to exist, but the underlying fee title ownership should be MPRB's.

THEME D: Pedestrian/bicycle access to parks around West Broadway Avenue

MPRB appreciates the inclusion of parks along Broadway Avenue in the SDEIS, even though these parks will not be directly affected by the Project. MPRB does agree that “no use” is the correct determination for North Commons Park and Cottage Park (Table A8-1). Under the Project as currently described, Hall Park, located along the previously considered Lyndale Avenue routing, would also be determined as “no use.” Connections between these parks and the neighborhoods both north and south of Broadway Avenue are, however, critical. MPRB strongly supports efforts by the Project and City of Minneapolis to ensure multiple pedestrian and bicycle crossings of the corridor and Broadway Avenue, specifically between the Penn and James Stations. MPRB also appreciates incorporation of MPRB's and the City's recommendations for implementation of a portion of the Northside Greenway alongside the James Avenue Station and extending toward North Commons Park.

These crossings and trail connections, however, are not adequately described nor supported in the SDEIS. Without them, several assertions about the enhancement and preservation of community connectivity are no longer accurate. Many residents living north of Broadway Avenue cross that street to access larger parks like North Commons and Willard and to utilize the YMCA, another important though private recreational amenity. North High School likewise lies south of Broadway Avenue and hosts a student body that walks and bikes from locations including neighborhoods to the north.

Currently, the Trust for Public Land's ParkScore metric for Minneapolis identifies a disparity between high- and low-wealth and between high- and low-BIPOC census tracts in the available acreage of park land in close proximity. According to these national metrics, north Minneapolis residents are just as likely to live within a 10-minute walk of a park, but within that 10-minute walk they have fewer acres on which to recreate. If the Project limits crossings of Broadway Avenue, thereby increasing walk times to the large park space at North Commons, this disparity will increase.

The location and number of light rail crossings are therefore specifically an Environmental Justice consideration. None of this information is included in the SDEIS. To acknowledge this reality, MPRB requests:

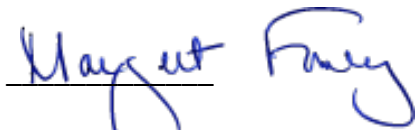
- A more robust narrative, possibly in Chapter 7: Environmental Justice, about the park acreage disparity identified by Trust for Public Land, with reference to the potential impacts of the Project if connections are not retained and improved.
- Specific verbal recognition of the multiple planned crossings of the corridor, appearing throughout the narrative, such as on Page 3-13 or in Table 3-8.
- Extension of the project limits along James and Knox Avenues southward to and including crossings of Golden Valley Road, to ensure direct connection to North Commons Park from the James Avenue Station and the proposed Knox crossing. MPRB is requesting inclusion of the Golden Valley Road intersections because Hennepin County is a light rail project partner, Golden Valley Road is a Hennepin County road, and discussion/negotiation now will be easier in the midst of this major project than a potentially three-agency agreement after the fact.

SUMMARY

MPRB appreciates the opportunity to comment on the Blue Line Extension SDEIS. We also appreciate the consistent and ongoing involvement of staff and commissioners in the project process. In this letter, MPRB is expressing some major concerns related to park impacts. Though not insurmountable, these issues—particularly the confusion and contradictions around 4(f)—create challenges in the project that go beyond technical decision-making and touch on the level of trust that is possible between MPRB and the Project.

Our most critical requests, therefore, relate to the project's impact on Wirth/Victory Memorial Parkway Regional Trail. The first is for a commitment to explore alternative design options to the proposed at-grade crossing of the Parkway, and to evaluate these options with clear and consistent data. The second is for immediate and broad communication that a "preliminary 4(f) determination" of *de minimis* for MPRB park resources is NOT in fact what is being proposed at this time. With its entrenchment in certain barely intelligible policy language, FTA is creating extreme difficulty among Project and agency staff and elected officials. The discrepancies in the SDEIS leave us either confused or believing the worst—namely that FTA has already made its determination and this vagueness is a tactic to suppress comment. In confusion, we must protect ourselves against the worst. A clear and public statement of FTA's true 4(f) determination (or lack thereof) will be an important step forward in maintaining the trust needed to build this line.

Respectfully Submitted,
on behalf of the Minneapolis Park and Recreation Board Commissioners



Margret Forney, President
Minneapolis Park and Recreation Board

Blue Line Extension

SDEIS Comment Tabulation

Approved by Board of Commissioners on XXXXX

#	Page	Section	Comment	Topic	Major Theme
1	ES-6	"What Alternatives..."	Include MPRB in the list of CMC members.	MPRB Inclusion	n/a
2	ES-10	Robbinsdale	Reference Wirth/Victory Memorial Parkway in description of CR82/Lowry intersection.	MPRB Inclusion	n/a
3	ES-11	Map	Why is there a label referencing "elevated LRT"?	Clarification/Error/Omission	n/a
4	ES-13	Section 4(f)....	The meaning of the 4(f) determination throughout the document is unclear, misleading, and includes multiple discrepancies. The Executive Summary, the entirety of Chapter 8, and portions of Appendix 8 say that a preliminary determination has been made. Other statements in Appendix 8 say that no determination can yet be made because further coordination is necessary. These statements are in direct contradiction and should have been corrected prior to or immediately subsequent to the release of the SDEIS, as requested by MPRB staff. This frustrating and avoidable issue is discussed at length in the main letter.	4(f) Determination	A
5	ES-20	Section 4(f)/6(f)	The 4(f) issue is discussed further in the main letter.	4(f) Determination	A
6	ES-21	"How would adverse...."	Recommend including 4(f) mitigation as a general topic under the bulleted list.	Clarification/Error/Omission	n/a
7	1-4	1.2.2	Reference to "Victory Memorial Park" is incorrect. The official park name is "Wirth/Victory Memorial Parkway Regional Trail. Could also be appropriate to reference the Grand Rounds here.	Park names	n/a
8	2-10	3rd paragraph	MPRB does not believe that the "interchange would remain functionally similar to existing conditions." The addition of the "slip ramp" could reduce traffic on Parkways, and this should be recognized as a benefit. The at-grade light rail crossing of the parkway and associated trails, however, could have negative impacts, which are not discussed here. The main letter discusses the Lowry station design in greater detail.	Lowry Station Area design	B
9	2-14	Table 2-3 Robbinsdale	Add elevated/flyover station to the list of alternatives not carried forward.	Clarification/Error/Omission	n/a
10	2-17	2.4.2.3	The build option for the Lowry station is not included here nor in the Minneapolis section, and should be.	Clarification/Error/Omission	n/a
11	2-18	Table 2-5	The list of "Build Alternative" bridges is confusing and may not be correct. Where does the modification/expansion of the Broadway Bridges appear?	Clarification/Error/Omission	n/a
12	2-19	Map	Why is there a label referencing "BLRT bridge and vertical circulation"?	Clarification/Error/Omission	n/a
13	2-20	Traction Power Substations	Some preliminary thinking suggests that a TPSS may be placed in the vicinity of the Grand Rounds at the Lowry Station. MPRB would strongly oppose placement of TPSS on park-owned property.	Utilities/Infrastructure	B
14	3-13	City of Minneapolis	The narrative here about the multi-use trails only suggests improvements in pedestrian comfort. However, the introduction of an at-grade light rail crossing will create an additional barrier than what exists today. This paragraph should recognize this potential impact alongside potential benefits. See main letter for additional information.	Lowry Station Area design	B
15	3-13	City of Minneapolis	The narrative does not reference any pedestrian crossings of light rail between Penn and James. These must be documented here, or the overall pedestrian environment and critical access to parks will be lessened from what it is today. See main letter for additional information.	Access to parks	D
16	3-14	Table 3-8	No reference to at-grade crossing creating a potential barrier. See main letter for additional information.	Lowry Station Area design	B
17	3-14	Table 3-8	No reference to north side greenway, nor of ped/bike crossings between Penn and James. See main letter for additional information.	Ped/Bike access	D
18	3-14	3.2.4	Without a better understanding of the impacts of a new at-grade light rail crossing, MPRB would not agree with the statements in this section. See main letter for additional information.	Lowry Station Area design	B
19	3-19	City of Minneapolis	Comments here echo those made for the pedestrian section. See main letter for additional information.	Lowry Station Area design	B
20	3-19	Table 3-10	No reference to at-grade crossing creating a potential barrier. See main letter for additional information.	Lowry Station Area design	B
21	3-19	Table 3-10	No reference to north side greenway, nor of ped/bike crossings between Penn and James. See main letter for additional information.	Ped/Bike access	D

Blue Line Extension

SDEIS Comment Tabulation

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#	Page	Section	Comment	Topic	Major Theme
22	3-19	3.3.4	Without a better understanding of the impacts of a new at-grade light rail crossing, MPRB would not agree with the statements in this section. See main letter for additional information.	Lowry Station Area design	B
23	3-24	City of Robbinsdale	This narrative should include more about the "slip ramp" and how that changes traffic movements in the station area, and potentially reduces traffic on MPRB Parkways. It should also discuss the at-grade light rail crossing and its impact on vehicular travel on the Parkway. See main letter for additional information.	Lowry Station Area design	B
24	4-1	Table 4-1	Would like to see the phrase "displacement and/or disconnection" included in line 2 column 3.	Clarification/Error/Omission	n/a
25	4-4	Table 4-3	MPRB's Parks for All Comprehensive Plan, though not strictly a land use plan, should be included here as a jurisdictional guiding document. There are several areas of guidance and alignment in Parks for All, which warrant a broader narrative included in Section 4.1.2.	MPRB Inclusion	n/a
26	4-7	4.2.1	Include MPRB's Parks for All, because we believe it was consulted. (If it was not consulted, please do so.)	MPRB Inclusion	n/a
27	4-17, 18	City of Robbinsdale, City of Minneapolis	These sections do not include any reference to the addition of a new at grade crossing of the Parkway and Grand Rounds trails being a potential impact on community cohesion. See main letter for additional information.	Lowry Station Area design	B
28	4-22	Table 4-13	The suggestion that there are no Park and Recreational parcel impacts is functionally incorrect. Even if the highway easement can be used for transit purposes, a park agency is still the underlying land owner and that land would be impacted. Furthermore, additional acquisition may be necessary to create NEW parkland on which the Parkway will exist. We believe this chart needs to be modified to show some park and recreation data. See main letter for additional information.	Land ownership	C
29	4-31	4.4.4	It is critical, somewhere, to have a discussion about the implications of a Grand Rounds Parkway and trails existing off of MPRB land. Mitigation measures may need to include additional land acquisition to ensure the Grand Rounds continues to exist on land owned by MPRB. See main letter for additional information.	Land ownership	C
30	4-38	Table 4-17	MPRB would request analysis of visual impact associated with one additional KVP, facing north FROM the project area to Victory Memorial Parkway. Though not a view of the trackway and station themselves, this view is one that could be impacted by project activities, namely the re-routing of the Parkway. The southern entrance to Victory Memorial Parkway, part of the Grand Rounds and a designated State Historic District, is inarguably a key viewpoint in the region and should be examined for potential visual impact.	Lowry Station Area design	B
31	4-40	4.5.4.2	MPRB recommends inclusion of "construction sequencing and scheduling" as a potential mitigation option.	Clarification/Error/Omission	n/a
32	5-8, 9	Maps	The maps do not show the Wirth/Victory Memorial Parkway Regional Trail area, where major utilities may exist	Clarification/Error/Omission	n/a
33	5-43	5.6 Noise	MPRB requests clarification on how parks are examined for noise impacts under FTA guidance. The Wirth/Victory Memorial Parkway Regional Trail area is designed as a passive space for traveling and rest, unlike more active parks in the corridor.	Noise	n/a
34	5-59	Table 5-17	The rusty patched bumblebee (<i>Bombus affinis</i>) is a Federally endangered species that should have been considered within the study area. Interactive maps on the US Fish and Wildlife website show the bee's range overlapping the project area, especially within and near Wirth/Victory Memorial Parkway Regional Trail. If there is some reason the bee has been excluded from analysis, that should be shared in the document.	Endangered species	n/a
35	5-66	Wildlife Habitat	Under several policy documents, MPRB is interested in increasing wildlife habitat within Minneapolis parks. If there are opportunities even beyond the Project's limits of disturbance to increase forest habitat for bats and/or prairie/grassland habitat for butterflies and bees, MPRB would be a willing partner in that effort.	Endangered species	n/a
36	6-22	2nd paragraph	MPRB agrees wholeheartedly with this statement. However, MPRB should be mentioned here, or at the very least the phrasing should be "...funding for acquisitions, Minneapolis and other communities...."	MPRB Inclusion	n/a

Blue Line Extension

SDEIS Comment Tabulation

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#	Page	Section	Comment	Topic	Major Theme
37	6-27	Parklands row, mitigation column	MPRB mostly agrees with this statement, but mitigation for parkland acreage impacts may be necessary under certain project design factors, such as a severing of connections to parks. In addition, assistance with acquisition of additional parkland would be an appropriate mitigation for past harms from the transportation system, especially in north Minneapolis and around the Lowry Station area, where land rights were taken for transportation purposes. The Project should strongly consider revising existing transportation easements as part of the project, and ensuring that the Parkway road itself can exist on MPRB owned land.	Land ownership	C
38	7-18	Figure 7-8	Many of the communities in north Minneapolis are disadvantaged in terms of park acreage available within a short walking distance. This should be recognized as an historic harm in some way on the map or in the narrative, even if this isn't specifically referenced in Justice40. See the main letter, topic D, for a discussion on park acreage disparity.	Park Acreage	n/a
39	7-41	7.4.2	Existing disparity in park acreage accessible to north side residents could be exacerbated if connections to parks near the project are severed by the light rail line. This is an environmental justice issue. See the main letter for further information.	Ped/Bike access	D
40	7-43	7.4.2.2	This section is another opportunity to discuss acreage disparity and critical connections to parks. See the main letter for further information.	Ped/Bike access	D
41	7-45	City of Minneapolis	Nowhere is there a discussion of the potential impact of an at-grade crossing of the Grand Rounds by a light rail line. No railroad crossings of the Grand Rounds exist today, and to propose the first within an EJ community must be examined for its potential impacts on community cohesion. See the main letter for further discussion.	Lowry Station Area design	B
42	7-45	City of Minneapolis	Because the proposed ped/bike crossings of Broadway Avenue between Penn and James are not listed nor discussed, there can be no assurance that the project will improve overall cohesion. See the main letter for further discussion.	Ped/Bike access	D
43	8-1	Table 8-1	MPRB requests further clarification on 4(f) determinations. To suggest here that mitigation is not required and that impacts are de minimis at this stage of project design is fundamentally inaccurate. See the main letter for further discussion.	4(f) Determination	A
44	8-2	Table 8-2	The official name for the park resource to be impacted by the Project is Wirth/Victory Memorial Parkway Regional Trail. MPRB and the Metropolitan Council see parkland on both sides of Lowry Avenue as the same single park unit with this name. Though the segment south of Lowry (Wirth Parkway) and the segment north of Lowry (Victory Memorial Parkway) have very different characters and purposes, they should be collectively described with the accurate name.	Park names	n/a
45	8-2	Table 8-2	MPRB understands from discussion with project office staff that the FTA has not in fact yet made a de minimis determination for Wirth/Victory Memorial Parkway Regional Trail and Grand Rounds Historic District. If true, an additional column should be added to this table. See main letter for further discussion.	4(f) Determination	A
46	8-4	Map	Change park name to Wirth/Victory Memorial Parkway Regional Trail.	Park names	n/a
47	8-7	8.3	MPRB believes it is too early to assume there will be no direct use, versus de minimis use. See main letter for further discussion.	4(f) Determination	A
48	8-8, 9	Tables 8-3 and 8-4	Change park name to Wirth/Victory Memorial Parkway Regional Trail.	Park names	n/a
49	9-18	Table 9-8	Regardless of determinations of use under 4(f) and Section 106, and regardless of existing easement rights, an MPRB construction permit will be required for work within parkland areas.	Clarification/Error/Omission	n/a
50	11-3	Pedestrian, Bicycle, and Vehicle Traffic	The description of the Build Alternative for these three factors does not accurately reflect the potential impacts of an at-grade light rail crossing of trails and the Grand Rounds Parkway near the Lowry station area. This analysis must be incorporated into the understanding of effects and benefits. See main letter for further discussion.	Lowry Station Area design	B

Blue Line Extension

SDEIS Comment Tabulation

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#	Page	Section	Comment	Topic	Major Theme
51	11-3	Pedestrian and Bicycle	The description of improvements with the Build Alternative is only true between Penn and James if adequate rail crossings are provided. This should be noted and affirmed in the narrative. See main letter for further discussion.	Ped/Bike access	D
52	App.8-1	8.1	This section references two properties where a "preliminary determination cannot be made without further coordination...." This is referring to Wirth/Victory and Grand Rounds Historic District, which creates extreme confusion because the entirety of Chapter 8 and portions of Appendix 8 say that a preliminary determination has been made. These statements are in direct contradiction and should have been corrected prior to or immediately subsequent to the release of the SDEIS. This frustrating and avoidable issue is discussed at length in the main letter.	4(f) Determination	A
53	App.8-2	Table A8-1	Change park name to Wirth/Victory Memorial Parkway Regional Trail.	Park names	n/a
54	App.8-2,3	Table A8-1	Both Wirth/Victory Parkway and the Grand Rounds Historic District are noted as de minimis use, in contradiction to statements elsewhere in this document. Furthermore, MPRB strongly believes there has not yet been enough coordination to make a de minimis determination. See main letter for further discussion.	4(f) Determination	A
55	App.8-5	Map	Change park name to Wirth/Victory Memorial Parkway Regional Trail.	Park names	n/a
56	App.8-20	Table row 3	Change park name to Wirth/Victory Memorial Parkway Regional Trail. Under the location column, the description of the Wirth Parkway portion is not correct. The southern terminus of Wirth/Victory Memorial Parkway is at Golden Valley Road. South of there, the park resource is called Theodore Wirth Regional Park and the parkway within in that area is not a separate park unit but a park road within Theodore Wirth Park.	Park names	n/a
57	App.8-48	8.7.1.10	Change park name to Wirth/Victory Memorial Parkway Regional Trail. Park areas on either side of Lowry Avenue are not considered separate parks neither by MPRB not by the Metropolitan Council under the Regional Parks Policy Plan. Portions of the property description will need to be rewritten to accurately describe these park resources and their boundaries.	Park names	n/a
58	App.8-48	"Potential Property Impacts"	MPRB is currently researching whether it believes Hennepin County and/or Metro Transit have the existing right to build light rail transit within a highway easement across a parkway. Until that question is resolved, the project office should consider park impacts within the entirety of MPRB-owned lands, regardless of the presence of the easement. See main letter for further discussion.	Land ownership	C
59	App.8-49	Map	The easement over parkland was taken as an easement for "trunk highway purposes." It may not actually be a general transportation easement. This map should refer to it by its established legal name and not use shorthand that could suggest an inaccuracy in land rights. See main letter for further discussion.	Land ownership	C
60	App.8-50	3rd paragraph	The statement that "parkways would generally be accessible to the public during construction" feels somewhat disingenuous. It is unlikely that modification and extension of highway bridges over the parkway, rail crossings of the parkway and trails, and construction of a station, with all the attendant equipment moving in the area, will allow passage through this construction site while active. MPRB would like a more honest understanding of park impacts during construction.	Clarification/Error/Omission	n/a
61	App.8-50	Coordination	It is important here to distinguish between ongoing staff coordination (and the design opinions and guidance of staff) and the elected MPRB Commissioners. The second sentence should be revised to read: "...has been discussed with MPRB staff and appears to be, in staff's perspective, a viable concept in comparison to other design options discussed. Further coordination with staff and review by the Board of Commissioners is necessary." See main letter for further discussion.	Lowry Station Area design	B
62	App.8-50	Coordination	This paragraph furthers confusion about the 4(f) determination by offering yet another description of the current reality. See main letter for further discussion.	4(f) Determination	A

Blue Line Extension**SDEIS Comment Tabulation***Approved by Board of Commissioners on XXXXX*

#	Page	Section	Comment	Topic	Major Theme
63	App.8-67, 68	8.7.2.6	MPRB appreciates the acknowledgement that a property transaction may be required to maintain MPRB ownership of parkways. In MPRB's perspective, this would be a functional requirement.	Land ownership	C
64	App.8-67, 68	8.7.2.6	This section does not discuss the impacts of the new at-grade light rail crossing of the Grand Rounds and its potential to sever that historic route for peds, bikes, and vehicles. The Grand Rounds Historic District is NRHP eligible because of its connectivity and completeness. Currently, no at-grade rail crossings exist. Further study is necessary to determine the level of impact, mitigation, or avoidance. See the main letter for further discussion.	Lowry Station Area design	B
65	App.8-78,79	8.9	The 2nd large bullet on page 78 and the 2nd large bullet on page 79 state that FTA cannot make a preliminary determination on two considered MPRB properties. This is a significant and confusing discrepancy within the document. See main letter for further discussion.	4(f) Determination	A

Offered by:
Seconded by:

Resolution 2024-138

RESOLUTION APPROVING A COMMENT LETTER ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS) FOR THE BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT, WHICH MAY IMPACT PARKLAND IN NORTH MINNEAPOLIS, INCLUDING WIRTH/VICTORY MEMORIAL PARKWAY REGIONAL TRAIL AND NORTH COMMONS PARK

Whereas, The Minneapolis Park and Recreation Board (MPRB) was created by the Minnesota Legislature in April 1883 and has the authority to manage and operate park facilities;

Whereas, The Metropolitan Council Blue Line Light Rail Extension Project (Project) was originally envisioned to travel on Olson Memorial Highway, then along railroad right-of-way through and adjacent to Theodore Wirth Regional Park intending to link downtown Minneapolis to the northwestern suburbs;

Whereas, Between 2020 and 2022, Metro Transit modified the Project route to travel through north Minneapolis on or near Broadway Avenue;

Whereas, MPRB operates and has jurisdiction over several park properties in north Minneapolis that are in close proximity to the currently proposed Project, including but not limited to Victory Memorial Parkway;

Whereas, Metro Transit has released a Supplemental Draft Environmental Impact Statement (SDEIS) for public comment, with the comment period closing on August 5, 2024;

Whereas, Minneapolis Park and Recreation Board has been given an extension on that comment period to September 12, 2021;

Whereas, The SDEIS outlines a wide variety of Project impacts of interest to MPRB, including impacts on walkways, park connectivity, green spaces and community connection;

Whereas the Metropolitan Council has proposed a Blue Line Extension along County Road 81(West Broadway/ Bottineau Boulevard) that would bring light rail to an at grade crossing at the intersection of Lowry Avenue and Theodore Wirth Parkway and Victory Memorial Drive;

Whereas, The Minneapolis Park and Recreation Board (MPRB) for over 140 years has worked to create, maintain, acquire, develop, protect, fund and preserve the 55 mile Grand Round system of parks and parkways which encircles the city of Minneapolis by allowing a relatively unimpeded route throughout the system to the benefit of all of citizens, visitors and our environment;

Whereas, the introduction of at grade light rail crossing of a light rail system is unprecedented in the history of the Grand Rounds system and the MPRB has fought transportation projects which have sought to interpret the Grand Rounds system at Highway 55 (Hiawatha Avenue) and Minnehaha Parkway, Cedar lake Parkway and 27th Avenue, East River Road and Lake Street, and has always endeavored to preserve the integrity of the century old Grand Rounds system;

Whereas, requiring that the Grand Rounds system cross grade at the same level as Blue Line railroad tracks would interrupt the flow of the Grand Rounds in North Minneapolis, necessitate the placement of railroad crossing gates on the Grand Rounds at a point between two elevated highway bridge abutments, and require an additional traffic signal at Lowry avenue, and would reroute the current parkways in a significant way by creating an “S” curve rather than a gentle curve, and relocate the parkways off of MPRB property;

Whereas, the proposed BLE would also change the alignment of Victory Memorial Drive, a place designated as an historic district under the laws of Minnesota;

Whereas, the SDEIS did not study the traffic impacts and pedestrian safety impacts and

Whereas Victory Memorial Drive is on the state registry of historic places and commemorates the service of 468 members of Hennepin County who died in the service of their country during World War I is the largest geographic monument to world war in the country;

Whereas, The SDEIS also includes preliminary determination of impacts on park properties under Section 4(f) of the Transportation Act of 1966, and MPRB is the Official with Jurisdiction (OWJ) over some of the park properties identified in the SDEIS;

Whereas, the MPRB vehemently disagrees with the SDEIS’s preliminary determinations on the impacts of park properties under Section 4(f) of the Transportation Act of 1966, the MPRB views the SDEIS to actually have extremely negative impacts on park properties and the opinion the MPRB legal counsel rebuts any legal conclusions that the Project Office has received regarding existing easements on this property and its ability to diminish the use of park property for transit use;

Whereas Section 4(f) aims to preserve the natural beauty of these properties and prevent their conversion to transportation use and the law states that the DOT cannot approve the use of Section 4(f) land unless there is no other practical alternative and all possible steps have been taken to minimize harm to the property

Whereas, A comment letter issued by MPRB through official Board action will serve both as guidance for Project staff regarding MPRB’s position, and also as guidance for MPRB staff in advancing ongoing design and planning discussions; and

Whereas, This resolution is supported in Parks for All, the MPRB Comprehensive Plan 2021-2036, under Goal 2: “Steward a continuum of recreation and nature,” Goal 3: “Provide core services with care,” Goal 4: “Work from our strengths and determine our role in partnerships,” and Goal 5: “Expand focus on health equity;”

Whereas the current BLE plan directly contradicts the priorities of MPRB’s comprehensive plan under Goal 1, strategy’s 8 and 13; Goal 2, Strategy 1; Goal 4, strategy 13 and Goal 5, strategy 1; especially concerning ‘prioritizing youth and seniors’ (G1, S8) and ‘prioritizing preservation of historic resources’ (G2, S1) and;

Whereas, A legal memorandum dated July 4, 2024, prepared by Patrick B. Steinhoff of Malkerson Gunn Martin, LLP, also referred to as The ‘Malkerson Letter’, confirms that MPRB has complete autonomy over its parkland and park uses;

Now Therefore be it RESOLVED, that the MPRB finds that any at grade crossing of light rail on the Grand Rounds and particularly at Victory Memorial Drive and Theodore Wirth Parkway to be inimical to the Resolution No. 2024-138

recreational, parkland, park use, and historical and landscape value of the MPRB's property; and that MPRB opposes the proposed plan of the Blue Line Extension by the Metropolitan Council for the reasons stated above;

RESOLVED, that the MPRB requests that the BLE Project Office develop plans to separate the Blue Line to be at a different grade than the parkways so as to avoid negative impacts on parks and parkways;

RESOLVED that this resolution further serves as a communication to the City of Minneapolis the needs and direction of the Minneapolis Park and Recreation Board as they consider Municipal Consent for the citizens of Minneapolis;

RESOLVED, That the Board of Commissioners directs the President working with staff and legal counsel to revise the draft comment letter on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Blue Line Extension Light Rail Transit Project consistent with this resolution, which would directly impact parkland in north Minneapolis, including Wirth/Victory Memorial Parkway Regional Trail and North Commons Park; and

RESOLVED, That the President of the Board and Secretary to the Board are authorized to take all necessary administrative actions to implement this resolution.

Adopted by the Minneapolis Park and Recreation Board
In formal meeting assembled on August 7, 2024

Commissioner	Aye	Nay	Abstain	Absent
Forney				
Abene				
Alper				
Menz				
Musich				
Olsen				
Rucker				
Shaffer				
Thompson				

Margret Forney, President

Jennifer B. Ringold, Secretary

Mayor Action:

☐ APPROVED

☐ VETOED

Jacob Frey, Mayor

Date



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

August 5, 2024

4112.1
ER24/0271

Kelley Brookins
Region 5 Office
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, IL 60606

RE: Supplemental Draft Section 4(f) and 6(f) Evaluation for the METRO Blue Line Light Rail Extension Project (Project) in Hennepin County, Minnesota.

Dear Kelley Brookins,

The U.S. Department of the Interior (Department) has reviewed the Supplemental Draft Section 4(f) and 6(f) Evaluation for the METRO Blue Line Light Rail Extension Project (Project) in Hennepin County, Minnesota. We understand that the project alignment identified in the 2016 Final Environmental Impact Statement (EIS) and Record of Decision (ROD) needs to change to provide transit service to the Cities of Brooklyn Park, Crystal, Robbinsdale, and Minneapolis. The new alignment developed in this Supplemental Draft EIS (SDEIS) remains consistent with the original purpose and need identified in the Final EIS published for the 2016 alignment. The Project is needed to effectively address long-term regional transit mobility and local accessibility needs while providing efficient, travel-time-competitive transit service that supports economic development goals and objectives of local, regional, and statewide plans.

The project sponsors are the Metropolitan Council (Council) and the Federal Transit Administration (FTA), as the lead federal agency. The Draft Section 4(f) evaluation considers the effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. Section 4(f) applies to publicly owned parks, recreation areas, wildlife and waterfowl refuges, or significant historic resources. No wildlife or waterfowl refuges occur within the Project area.

The SDEIS evaluates two alternatives, a No-Build Alternative and a Build Alternative. The Build Alternative includes alignment and design option locations for each of the four Project area Cities (Brooklyn Park, Crystal, Robbinsdale, and Minneapolis).

Section 4(f) Preliminary Determinations

Based on the current level of design and analysis, the FTA has made the following preliminary Section 4(f) determinations as described in Section 8.9 Preliminary Determinations of Section 4(f) Use in Appendix Chapter 8: Supplemental Draft Section 4(f) and 6(f) Evaluation of the SDEIS.

Park/recreational Property Determinations

The FTA has determined that the Build Alternative would result in a Section 4(f) *de minimis* impact for the park/recreational properties listed below.

- College Park: The recreational amenities of College Park would be unaffected by the proposed 0.05-acre permanent incorporation of land. To minimize harm, the small area of temporary impact (0.03 acres) would be restored to existing or better condition following construction.
- Tessman Park: The recreational amenities of Tessman Park would be unaffected by the proposed 0.14-acre permanent incorporation of land. To minimize harm, the area of temporary impact (2.02 acres) would be restored to existing or better condition following construction.
- 2105 Girard Ave N and associated parcels: The recreational amenities of 2105 Girard Ave N and associated parcels would be unaffected by the proposed 0.005-acre permanent incorporation of land. To minimize harm, the small area of temporary impact (0.03 acres) would be restored to existing or better condition following construction.
- Hall Park: The recreational amenities of Hall Park would be unaffected by the proposed 0.08-acre permanent incorporation of land. To minimize harm, the area of temporary impact (3.76 acres) would be restored to existing or better condition following construction.

The FTA has determined that the Build Alternative would result in Section 4(f) temporary occupancies during construction for the park/recreational properties listed below. FTA has preliminarily determined that the Section 4(f) temporary occupancy exception criteria in 23 CFR § 774.13(d) would be met in all instances and therefore no use would result at any of these five properties.

- Park property adjacent to Rush Creek Regional Trail: The recreational amenities of the park property adjacent to Rush Creek Regional Trail would be unaffected by the proposed temporary occupancy of less than 0.01 acres. To minimize harm, the area would be restored to existing or better condition following construction.
- Crystal Lake Regional Trail: The recreational amenities of the Crystal Lake Regional Trail would be unaffected by the proposed temporary occupancy of 6,000 feet of trail. To minimize harm, the area would be restored to existing or better condition following construction.
- Twin Lakes Boat Launch: The recreational amenities of the Twin Lakes Boat Launch would be unaffected by the proposed temporary occupancy of 0.54 acres. To minimize harm, the area would be restored to existing or better condition following construction.
- Spanjers Park: The recreational amenities of the Spanjers Park would be unaffected by the proposed temporary occupancy of 0.01 acres. To minimize harm, the area would be restored to existing or better condition following construction.
- Lakeview Terrace Park/Crystal Boat Ramp: The recreational amenities of the Lakeview Terrace Park/Crystal Boat Ramp would be unaffected by the proposed temporary occupancy

of 0.91 acres. To minimize harm, the area would be restored to existing or better condition following construction.

The FTA has determined that none of the Section 4(f) park/recreational properties along the Project alignment would be subject to a constructive use.

At this time the FTA is unable to make a determination regarding Theodore Wirth Parkway/Victory Memorial Parkway, and additional coordination with the Official with Jurisdiction (OWJ) is necessary.

Historic Property Determinations

The FTA has determined that the Build Alternative would result in a Section 4(f) *de minimis* impact for the following historic property.

- W Broadway Ave Residential Historic District: The historic setting and feeling of the W Broadway Ave Residential Historic District would be unaffected by the proposed 0.016-acre permanent incorporation of land. Based on the Project's current level of design, it is anticipated that there would be a Section 106 finding of No Adverse Effect.

The FTA has determined that the Build Alternative would result in a Section 4(f) temporary occupancy of the following historic properties.

- Hennepin County Library Robbinsdale Branch: The historic setting and feeling of the Hennepin County Library Robbinsdale Branch would be unaffected by the proposed temporary impact (0.02 acres). To minimize harm, the area would be restored to existing or better condition following construction. Based on the Project's current level of design, it is anticipated that there would be a Section 106 finding of No Adverse Effect.
- Graeser Park (historic property): The historic setting and feeling of Graeser Park would be unaffected by the proposed temporary impact (2.97 acres). To minimize harm, the area would be restored to existing or better condition following construction. Based on the Project's current level of design, it is anticipated that there would be a Section 106 finding of No Adverse Effect. This is based on the temporary easement being in an area of the property where the features likely to be impacted do not define the historic character of the property.

The FTA has determined that none of the Section 4(f) historic properties along the Project alignment would be subject to a constructive use.

At this time the FTA is unable to make a determination regarding the Ground Rounds Historic District, and additional coordination with the OWJ is necessary.

The Department understands that continued coordination with the SHPO and consulting parties will occur as the Project progresses, and these findings will be confirmed as the Project's design advances and prior to the publication of the Project's Supplemental Final EIS/Amended ROD.

Section 4(f) Comments

The National Park Service (NPS) reviewed properties in and around the project area, along with properties included in the NPS's National Historic Landmarks (NHL) GIS database, and no existing or potential NHLs were identified.

The Department's review concurs with the preliminary determinations of actions that constitute a use under Section 4(f) properties and that the Council and FTA have included all possible planning to minimize harm to Section 4(f) properties from such use.

Section 6(f) Preliminary Determination

The FTA reviewed the Land and Water Conservation Fund (LWCF) grants database and consulted with the Minnesota Department of Natural Resources (DNR) and determined that one property, Becker Park, was developed with LWCF grant assistance within the Project area as described in Section 8.10.1 Section 6(f)(3) of the Land and Water Conservation Fund Act in Appendix Chapter 8: Supplemental Draft Section 4(f) and 6(f) Evaluation of the SDEIS. This property would not be impacted by the Project.

Section 6(f) Comments

The NPS reviewed the Project outlined above and concurs with FTA that Becker Park in Crystal, MN under grant # 27-01422 will not be impacted according to the SDEIS. The NPS did determine that the proposed project will impact the Sochacki Park within the City of Robbinsdale, as noted in the SDEIS document and referenced by Figure 8.7-8. This park was LWCF assisted under an acquisition grant (grant #: 27-01087; titled Sochacki Park for future development) on the west side and South Halifax Park on east side of the railroad tracks. The NPS recommends continued consultation with the agency that administers Minnesota's LWCF Program. For consultation contact:

Phil Leversedge
Minnesota Department of Natural Resources
Deputy Director, Division of Parks and Trails
500 Lafayette Road
St. Paul, MN 55155-4039
phil.leversedge@state.mn.us
651-259-5650; or

Sarah Wennerberg
Senior Grant Specialist
Sarah.wennerberg@state.mn.us

The Department concurs with the Section 4(f) and Section 6(f) preliminary determinations and recommends that coordination continue with all consulting parties and OWJ to ensure that impacts to 4(f) and 6(f) properties are considered along with ensuring that measures to minimize harm are included in project plans and documented in the final environmental document.

The Department has a continuing interest in working with the Council and FTA to ensure impacts to resources of concern are adequately addressed. For matters related to these comments, please coordinate with Hanna Daly, Regional Environmental, National Park Service Serving Department of Interior Regions 3, 4, and 5, hanna_daly@nps.gov. We appreciate the opportunity to provide these comments.

Sincerely,

John Nelson
Regional Environmental Officer

cc: Hanna Daly, NPS

Electronic distribution: BlueLineExt@metrotransit.org

**Additional comments from Minneapolis City Council
July 18, 2024**

Regarding the vicinity of 10th Avenue:

Concern about access to and from the Fire Station and how that will impact response times.

Concern about impact to traffic flow in the North Loop, especially on Washington Avenue and 1st Street North and 2nd Street North. A segment of Washington Avenue is set to have a BRT line which could potentially impact traffic flow and could have an impact on general deliveries for businesses and individuals living in the area and there is concern that the proposed light rail alignment will exasperate any congestion, traffic flow and accessibility issues that may occur.

Concern from the Twin Cities International School on how this alignment will impact traffic and cause backups with their school buses and parents dropping off and picking up students at the school. They also have concerns about noise, vibration, and the impacts those will have on the students and their ability to focus, concentrate, and learn.

Concern about how the alignment will negatively impact the Salvation Army. This non-profit organization relies entirely on donations and sales from the thrift store. Salvation Army recently spent millions of dollars doing a renovation of their facility and provides a vital service to the community by running a successful program for people overcoming addiction.

Concern that 10th Avenue is 1 of only 2 roads that currently allow access between the North Loop and the "west loop" (6th Ave is the other). Eliminating vehicular traffic on 10th reduces access to and from the North Loop neighborhood as it connects to the city.

Concern that eliminating vehicular traffic on 10th Avenue North will negatively impact access to and from many residential buildings including: The Redwell, 918 Lofts, Bassett Creek Lofts/Bassett Creek Business Center. In addition to access, concern that the proximity to a rail line creates concern regarding noise, vibration and property values for these homeowners and businesses.

Concern about future plans for I-94 viaducts and how those potential plans intersect with this project. There is significant concern on how future potential changes to the viaduct combined with the light rail would further add to access/traffic flow concerns throughout the North Loop area. MnDOT and Met Council are urged to coordinate to ensure the best outcomes for the community.

Concern about how thoroughly this alignment has been studied because it is a relatively recent change to the proposed route and whether other options, including those utilizing government owned right of way have been sufficiently studied and may have fewer negative impacts on residents, businesses, the school, and traffic flow.

Concerns that public engagement regarding this portion of the alignment have been insufficient.

Regarding the proposed Lowry Station Area and Grand Rounds:

Concern that impacts or alternatives to an at-grade crossing of light rail over the Parkway and associated pedestrian and bicycle trails have not been sufficiently studied. More detailed information is needed about impacts to the safety of bikers and pedestrians and minimizing disruption to the Grand Rounds.

Significant concern about how proposed plans will impact connectivity to the Grand Rounds. The Northside was only recently connected to the Grand Rounds in the same way that other areas of the city are connected. Northside residents deserve the same connection to trails and parks as other more affluent areas of the city.

Concern that a train crossing would harm the historic nature and charm of the Victory Memorial Parkway which is an important memorial honoring Hennepin County residents who died in WWI.

Concern about how proposed plans would impact the newly constructed Lowry Avenue bridge(s) - affecting a significant taxpayer investment and posing potential environmental impacts.

Concern by some that the Project Office has not provided the desired level of information regarding the design of the Lowry stop including sufficient design details and renderings.

Regarding the proposed route at 21st Avenue:

Concern about how displacement funds will be directed to those in the most need, particularly those along 21st. Will affected people be given enough compensation to purchase another home in their neighborhood should they wish to stay?

Concerns by some that the 21st Avenue route has not been studied with the same level of detail as the potential Broadway and Lowry routes.

METRO Blue Line Extension

Supplemental Draft Environmental Impact Statement Comments

July 9, 2024

Community Planning and Economic Development and Public Works have compiled comments on the SDEIS. Key themes are noted in the accompanying Request for Council Action in addition to this document. In April 2024, the Directors of Public Works and CPED on behalf of the City of Minneapolis, submitted a letter and comments on the draft 30% plans; these comments have yet to be resolved by the Project Office and still hold in addition to the comments below.

Key themes:

Purpose and need

- The City of Minneapolis supports the project purpose and need based on the understanding that “the Project would invest in an area that has experienced a history of systemic racism and disinvestment, provide improved connectivity and access for communities in the Project area, and advance local and regional equity. The Project is needed to effectively address long-term regional transit mobility and local accessibility needs while providing efficient, travel-time-competitive transit service that supports economic development goals and objectives of local, regional, and statewide plans.”

Station locations

- Whenever referencing the Lowry Station, it needs to be referred to as both a City of Robbinsdale and a City of Minneapolis station. It is consistently referred to only in the City of Robbinsdale sections, and only shown in Robbinsdale maps.
- A station at Washington Avenue North and West Broadway must be constructed with the project to adequately serve the corridor travel shed, provide improved connectivity and access for communities that were impacted by the construction of I-94, support project and city economic development goals, and advance local and regional equity by providing greater access to employment areas. This is in addition to stations at Lowry Avenue, Penn Avenue, James Avenue, Lyndale Avenue, and Plymouth Avenue.

Anti-displacement, property and community impacts

- Continue to work with City and Project Partners to coordinate opportunities for potential replacement properties in the city and along the project corridor in advance of the amendment to the Record of Decision.
- Continue to partner with the City to identify cultural resources in the areas of potential impact and opportunities to minimize and mitigate Build Alternative impacts on those resources.
- Project Office references the Anti-Displacement Working Group (ADWG) Recommendations Report for identifying policy changes and resource re-allocation to support anti-displacement

initiatives. However, the Project does not clearly articulate the indirect-impacts and cumulative effects from the Build Alternative, and the possible mitigation commitments for keeping existing residents and businesses within the study area.

- While the project accurately identifies the Environmental Justice (EJ) and Disadvantaged Communities with the project area, it does not go far enough to evaluate impacts and consider the incomes of these communities along the project route compared to the general population of the Minneapolis-St. Paul-Bloomington Metropolitan Statistical Area (MSA) that is defined as part of the study area for 4.6 Economic Effects.
- Parking impacts in Minneapolis need to accurately describe changes to public and private parking (e.g., the anticipated impacts to parking on West Broadway from Irving Avenue North to Lyndale Avenue North and the impacts to parking in the North Loop area under the viaduct as a result of the proposed 8th and 9th Street extensions). Mitigation should consider adopted city parking policies and incorporate transit-oriented design solutions including structured and underground parking.
- City staff have reviewed the 4(f) and 6(f) chapter and appendix and defer to the MPRB regarding no use, de minimis use, and constructive use determinations related to park properties.
- Noise and vibration from the LRT operations must be mitigated.
- Public art must be integrated into project design.
- The Project Team needs to identify and mitigate harms experienced in communities along the previous alignment including communities along Olson Memorial Highway.
- Impacts related to public safety and perceptions of public safety need to be identified and work to coordinate safety-related efforts and/or explicit links to existing Metro Transit public safety efforts need to be documented.
- Lowry Avenue was considered a promising option for the Blue Line Extension but West Broadway was selected as the preferred alternative; as part of providing an integrated transit network serving North Minneapolis, and support of bringing riders to the Blue Line Extension, the City supports advancing plans for a Bus Rapid Transit Line along Lowry Avenue.
- The SDEIS and future mitigation should provide a more comprehensive and coordinated analysis of the health costs and benefits of the project as done with the Health Impact Assessment (HIA) for the previous alignment in 2013. A HIA is a process for assessing the potential effects of a proposed policy, plan, or project on the health of a population and the distribution of those effects within the population. The overarching goal is to make the health impacts of decisions more explicit and help shape decisions to improve a population's health.

Design

- The engineering concept layouts included in the SDEIS do not align with designs reviewed by City staff as part of the draft 30% plans and do not reflect more recent revisions discussed with the project team. Notable changes not reflected in the SDEIS layout includes but is not limited to:
 - Lowry Avenue station design;
 - Location and number of pedestrian and bicycle crossings including the proposed signal control;
 - Queen Avenue bikeway connection;
 - On-street parking at Penn Avenue;
 - James Avenue station design;
 - Reconstruction of West Broadway from Irving Avenue North to east of Lyndale Avenue;

- Reconstruction of Irving Avenue North, Girard Avenue North, Fremont Avenue North, Emerson Avenue North, Bryant Avenue North, Aldrich Avenue North, and Lyndale Avenue North between 21st Avenue North and West Broadway;
- Pedestrian realm, greening, bikeway design and vehicular lanes on 21st Avenue North between 4th Street North and North 2nd Street and Washington Avenue between 21st Avenue North and 10th Avenue North; and
- Corridor design including track configuration along 10th Avenue North, 7th Street North, and 6th Avenue North.
- Project design must align with the city's Complete Street Policy and Street Design Guide.
- Pedestrian Level Street Lighting should be evaluated and included as part of the project as appropriate in accordance with the City of Minneapolis Street Lighting Policy and Transportation Action Plan.
- A more wholistic description of changes to pedestrian experience with the introduction of Light Rail on West Broadway would more accurately describe the long-term impacts of the pedestrian experience, versus focusing on intersection-level changes.
- A more detailed analysis of pedestrian crossings eliminated, impacts, and mitigation along West Broadway west of James Avenue North to the city limits is necessary.
- The city requires an agreement with the Project Office on long-term ownership and maintenance to support proposed designs for the 21st Avenue bridge over I-94.
- Safety and security at station locations and routes to/from stations is critical. It is recommended that measures such as (but not limited to) security cameras and street lighting (per the City of Minneapolis street lighting policy) be installed and that station design allows for visibility at stations.
- The City of Minneapolis requires that local stormwater policies and ordinances be adhered to such as the [Chapter 54 Stormwater Management Ordinance](#). Stormwater management, wetland and flood plain mitigation must consider not only the specific area of impact, but broader impacts on the local area and regional system. Stormwater management areas should also consider and not preclude future development potential.
- Traction power substations and signal bungalows must be appropriately placed, and the visual impact mitigated. Traction Power Substations should be appropriate for the community context, should be landscaped, should be fenced for safety, and should be designed with architectural fencing instead of chain link fence.
- The project must minimize tree loss; salvage trees where possible and replace trees per the Minneapolis Park and Recreation Board urban tree policy. Boulevard design should be consistent with the Minneapolis Street Design Guide.
- Embedded track should be constructed along the entire length of the project within Minneapolis and must be designed to allow for emergency vehicle access needs.
- Traffic impacts along the corridor need to be mitigated.

Utility impacts

- The preferred alignment has the potential to impact access and structural condition of the Bassett Creek Tunnel, which is a major storm sewer facility serving a large area. Development along this corridor has created additional access challenges to the tunnel. The Project Office should evaluate how access to this tunnel is to be provided, potential structural impacts and mitigate negative impacts as necessary to ensure continued operation of the tunnel in this location is sustainable, including the existing agreement and replacement plan with Metro Transit.

- The document suggests no long-term impacts to utilities are anticipated because the relocation and reconstruction of utilities would maintain current service levels. The project has the potential to drive redevelopment of the area around the project corridor, thereby increasing density. If this is the case, current service levels may not be sufficient for future conditions. Any anticipated increases to population densities along the corridor should be evaluated and mitigation of insufficient utility capacities should be provided for.
- Utilities and street infrastructure disrupted as part of the project must be replaced at the project's expense or through agreement with other utility providers such as Xcel.
- Relocation or replacement of utilities including design (e.g., sizing, possible encasement) and location of the new facilities must be determined in coordination with city staff. The relocation process for the Xcel transmission line under 10th Avenue North must also include community engagement and improvements to the selected corridor in alignment with city plans and policies.

Construction and detours

- Detour routes must be provided for all short-term and long-term closures of pedestrian, bicycle, transit and vehicular facilities during construction, and align with city, state and federal policies, standards and guidelines including the city's Complete Streets Policy.
- Project construction shall be coordinated with other major construction projects in the area occurring at the same time with a plan to minimize disruption of multiple projects.
- Best practices for mitigating and communicating construction impacts for local businesses and residents before construction, during construction and after construction should be implemented.

Contingency

- The City of Minneapolis supports regional investment in high quality neighborhood-based transit in the West Broadway corridor. We acknowledge the current SDEIS focuses on light rail transit and also recognize that bus rapid transit (BRT) could provide similar benefits to communities and businesses along the corridor if the project office considered alternative modes in the future.

Mitigations

- Given the scale of impacts and sequencing of the SDEIS, Municipal Consent and SFEIS, the City of Minneapolis requests the Project Office develop a mitigation workplan in advance of the Municipal Consent process, which should describe anticipated mitigations for major impacts in Minneapolis and/or the process to determine mitigations for impacts identified in the SDEIS. Developing this workplan should include coordination with the public.

Detailed Technical Comments

Comments refer to page, figure, and table numbers as shown in the courtesy DRAFT version of the SDEIS shared with the City on May 31, 2024. Some page, figure, and table number references may differ from the SDEIS shared publicly on June 14, 2024.

Executive Summary

1. Please update this section to reflect comments on individual chapters below.

Chapter 1 Purpose and Need

2. Pg 1-3 -- Replace Lyndale Ave N with 21st Ave N in Section 1.2.1.
3. Check accuracy of section 1.2.3. The Route 14 and Route 32 operate north of 29th Avenue North.
4. Pg 1-4 -- Map shows Lowry Ave station in Robbinsdale only; this is not accurate. The station is sited in both Minneapolis and Robbinsdale; the circle on the map needs to be on the border.
5. Pg 1-5 -- Project setting should better reflect a built urban form, grid layout, fully built out with a highway dividing portions of alignment in north Minneapolis.
6. Section 1.2.2: Add potential redevelopment sites, opportunities and developments near Washington Ave and West Broadway in Minneapolis, similar to the comments about development opportunities in Brooklyn Park.
7. Pg 1-5 -- In regional transit system, refer to existing local routes (14, etc.) serving north Minneapolis.
8. Pg 1-5 -- In regional transit system, include H Line.
9. Pg 1-7 -- Figure 1-2 needs to show Lowry station in both Robbinsdale and Minneapolis; won't comment again on this, but all maps need to adjust.
10. Pg 1-8 -- Figure 1-3 should label D Line in North Minneapolis and include H Line, especially since it connects to project.
11. Pg 1-8 -- Figure 1-3: recommend pull out of Minneapolis project area (vs downtown).
12. Pg 1-9 -- Figure 1-4: In 2023, please add Minneapolis' Racial Equity Framework for Transportation.
13. Pg 1-11 -- In general, would be good to link more directly to things when referenced (e.g., the criteria used in the analysis of alternatives are based on Project Principles, which are available on the Council's website in footnote 20, but the link at footnote 20 goes to overall report, not Project Principles).
14. Pg 1-12 -- Under Growing Travel Demand, and Table 1-1 in particular, raw number as well as percent change for population and jobs growth should be noted. This factors into ridership estimates, as the number of people and jobs matter more than the percent change.
15. Pg 1-13 -- Figure 1-5: can you provide more delineation between the 10-25% band? Would be helpful to distinguish visually.
16. Pg 1-14 -- Figure 1-6: Please site year of data. Will this be updated in SFEIS?
17. Pg 1-16 -- When talking about Minneapolis TAP, you can reference the mode shift goal (3 of every 5 trips taken by walking, biking and transit by 2030), along with GHG (80% reduction from 2006 baseline by 2050) and VMT reduction goals (1.8% per year). Also, transit actions 4.3 and 4.5 directly support transit on West Broadway and the BLRT project. (Link: <https://go.minneapolismn.gov/final-plan/transit/strategy-4>)
18. Pg 1-19 -- Table 1-2: Is the project cities line at top of table just an average of the 5 or weighted by population? Would be good to clarify on the table. Recommend weighting it by population.
19. Pg 1-20 -- Figure 1-8: Please put description in legend of standard deviation and other terms.
20. Pg 1-20 -- Figure 1-8: What are the dotted lines on the map? These are not included in the legend.
21. Pg 1-23 -- Figure 1-10: What are the grey areas? Please add to legend.
22. Pg 1-23 -- It is important to talk about interstate building as a key way that communities along this corridor were impacted by racist policies/programs -- it wasn't just about housing -- in this chapter. Note how the project is working toward and has goals to address some of the impacts of that legacy as well.

23. Pg 1-25 -- This sentence is confusing, consider adjusting: "LRT experienced decline from 2019 conditions, between 90 percent and 75 percent, respectively, which occurred during summer 2020."
24. Pg 1-25 -- Figure 1-12: Update with newer data if available.
25. Pg 1-25 -- When talking about impacts of COVID-19 on transit demand, in particular express service, please contextualize whether project communities have that type of service, or not.
26. Pg 1-25 -- When talking about impacts of COVID-19 on travel demand, include information on vehicular travel impacts especially peak periods and VMT. This could help support some of the project decisions related to lane reductions on West Broadway and other corridors.
27. Pg 1-27 -- Consider removing "orderly" from this sentence: The Council is working to ensure the orderly economic development of its seven-county...
28. Pg 1-27 -- If Met Council has adopted any of the new goals/outcomes/etc. of the 2050 Transportation Policy Plan, recommend switching from 2040 to 2050 in SDEIS or SFEIS.

Chapter 2 Alternatives

29. Pg 2-3 -- First time using AA, please spell it out. It would be helpful to have a quick summary of the relationship and sequencing of the AA/DEIS/FEIS/SDEIS/SFEIS/ROD, etc.
30. Pg 2-3 -- Section 2.2.1, for the sentence that compares BRT and LRT and includes the statement that BRT has "greater impact to general roadway traffic compared to LRT" – this does not seem to necessarily be the case in Minneapolis, since there are lane reductions planned through much of the alignment to accommodate LRT. Please revise.
31. Pg 2-3 -- Regarding this sentence: Transportation decisions made more than 60 years ago devastated the communities along the Project, and those impacts are still felt today. More needs to be included in the chapter about this, for example, the impact of building interstates, the high injury streets that still remain. Recommend including this context in Chapter 1 or earlier in this chapter. It is important to root this in real actions that were taken by government.
32. Pg 2-4 -- This is the first use of the term "disadvantaged communities." Please explain what this means in the text or seek alternate term.
33. Pg 2-4 -- "Downtown Minneapolis" in the first full paragraph on page 4 should be reframed as downtown and north Minneapolis.
34. Pg 2-4 -- Define CAC, BAC, CMC in the text.
35. Pg 2-7 -- Figure 2-4: Similar to treatment of 2016 stations, include/show stations considered as part of Lowry Avenue, Lyndale Avenue North and the "pink line" alignment. This was an important part of the route modification process and should be included in the documentation.
36. Throughout: Correct terminology is West Broadway, not West Broadway Avenue.
37. Pg 2-8 -- Statement says: *W Broadway Ave alignment would serve a higher percentage of low-income and BIPOC populations and zero-vehicle households through three stations on a shorter route.* There was never a decision about the number of stations during the Route Modification process -- please adjust. The Route Modification process was not intended to define the number of stations included with the project; this was always considered secondary to the route and an item to confirm later in the process.
38. Pg 2-8 -- Statement says: *...acknowledged that more detailed evaluation was needed to identify the best route in downtown Minneapolis.* Please include "including stations to best serve the community" and remove "downtown."

39. Pg 2-8 -- Description includes organizations and neighborhoods. Consider including a map of the Lyn Park neighborhood, West Broadway Business Coalition service area, and others. Otherwise, please include more description of what these things/areas mean to outline their significance.
40. Pg 2-8 -- Add "The business coalition was concerned that..." to the sentence that begins "The loss of parking..." if accurate.
41. Pg 2-8 -- Include a map with the alternatives labeled. The 21st Avenue North and East of I-94 alignment is not easy to understand in text alone without a map.
42. Pg 2-8 -- Update column heading for Table 2-2 to past tense: "Alignment and Design Option Locations Considered."
43. Pg 2-10 -- The Lowry Avenue station discussion needs to be repeated in the Minneapolis section, or alternatively, a new section called Robbinsdale/Minneapolis should be created to accurately depict this as a station that is geographically in and serving both communities.
44. Pg 2-10 -- Should include in bulleted list a station or not a station at Washington Avenue and West Broadway, and a subsequent paragraph describing this decision point. Also include in Figure 2-5.
45. Pg 2-10 -- Should include in bulleted list a vehicle or no vehicle bridge across 21st Avenue North across I-94, and more context about this decision point.
46. Pg 2-12 -- Please include, in the one or two station between Knox Avenue North and I-94 discussion, the concept that it is not the tracks that provide opportunity/benefit to the community, but the stations. This was a major part of that decision-making process.
47. Pg 2-12 -- Please include, in the Lyndale Avenue North and East of I-94 discussion, some positives in why East of I-94 was selected in addition to negatives about Lyndale Avenue North (e.g., employment opportunities, serving the North Loop neighborhood, etc.)
48. Pg 2-12 -- In the West Broadway and 21st Avenue North discussion, local traffic cannot be routed through alleys. Restate to say "retain access" or similar.
49. Pg 2-12 -- In the West Broadway and 21st Avenue North discussion, please remove "flyover" from "would require a flyover bridge." It requires a bridge.
50. Pg 2-13 -- Section 2.4.1 - Does the No Build 252/94 EasyPass assumptions include an EasyPass lane all the way into downtown Minneapolis, and does this assume there would be lane added, not converted?
51. Pg 2-13 -- Table 2-3: First bullet under Minneapolis should use West Broadway rather than CR81 for consistency.
52. Pg 2-13 -- Table 2-3: Under Other Features, include mall description for 21st Avenue North.
53. Pg 2-13 -- Table 2-3: Lowry Ave station needs to be recognized as a Minneapolis station (in addition to Robbinsdale).
54. Pg 2-14 -- Table 2-3: Other features in Minneapolis need to acknowledge transit mall along 21st Avenue North.
55. Pg 2-14 -- Table 2-3: Items not carried forward should include the Washington Avenue and West Broadway station.
56. Pg 2-14 -- Table 2-3: Items not carried forward should include a LRT, pedestrian, and bicycle only 21st Avenue North bridge over I-94
57. Pg 2-14 -- Table 2-3: Items not carried forward includes elevated Lowry Avenue station. Nothing in the text speaks to that. Should this be included in the description of the design process?
58. Pg 2-14 -- Table 2-3: In Minneapolis, refer to CR81 as West Broadway (and include CR 81 in parenthesis if desired).

59. Pg 2-17 -- Section 2.4.2.4 talks about the station near Penn Avenue as 'new' - these are all new. Please remove word 'new'.
60. Pg 2-17 -- Include a potential or future station at Washington Avenue and West Broadway in description of station locations. This is in alignment with how environmental documents have included potential stations in past projects.
61. Pg 2-17 -- Section 2.4.3: Aren't we beyond August 2023 level of design?
62. Pg 2-17 -- There are bridges shown at Olson Memorial Highway, 6th Avenue North, 7th Avenue North and Lowry Avenue on the map that are not included in Table 2-5.
63. Pg 2-17 -- Map labels need updated (e.g., includes "Vertical Circulation" at Lowry Avenue Station)
64. Pg 2-20 -- "The Council anticipates that most TPSS sites would be located within existing transportation rights-of-way." This seems unlikely for Minneapolis sites. Add a caveat for Minneapolis TPSS if unlikely to be in existing ROW.
65. Pg 2-21 -- Include a description for Figure 2-8 that describes what "future" park and ride locations mean. Will these be built with the project or at a later date? Include a similar map as Figure 2-8 for future stations e.g., Washington Avenue and West Broadway. If the blue dots are meant to signify existing locations, then include that in legend.
66. Pg 2-22 -- When talking about LRT vehicles traveling at speed of up to 55 mph, may want to caveat with something like "but expected to travel at much slower speeds in the dense urban core of Minneapolis."
67. Pg 2-22 -- When talking about how transit frequencies are expected to return, it would be helpful to know by when and state how much they've been reduced now.

Appendix A-2 Alternatives Development Process

68. Include consideration of a station at West Broadway at Washington.
69. Pg 2 -- Figure A2-1 Alignment options should include Build Alternative (East of I-94 sub-option) on 10th Ave N and Washington Ave, through the intersection of those two streets and show the proposed Plymouth Ave Station on Washington Ave between Plymouth Ave and 10th Ave N.
70. Pg 11 -- Lowry station should be referred to as a shared station between Robbinsdale and Minneapolis.
71. Pg 13 -- Figure A2-7 should reflect the Build Alternative alignment (East of I-94 sub-option) on 10th Ave N and Washington Ave, through the intersection of those two streets and show the proposed Plymouth Ave Station on Washington Ave between Plymouth Ave and 10th Ave N.
72. Pg 20 -- In Table A2-7, the row which details Bicycle Conditions should include mention of the proposed bike facility along 21st Avenue North.

Chapter 3 Transportation

73. Pg 3-1 -- Table 3-1: 3.4 - Project is looking at all intersections, not just signalized, at least in Minneapolis, correct?
74. Pg 3-1 -- Table 3-1: 3.5 - Please write out LOD and describe what it is.
75. Pg 3-3 -- Figure 3-1: Please add D Line label in north Minneapolis near project area.
76. Pg 3-3 -- Figure 3-1: Why have a 2026 year in title/not extend to 2030 per when opening of BLRT is supposed to be? And also include H Line.
77. Pg 3-4 -- Figure 3-2: Where is Route 14? A zoomed in version of the transit map of North Minneapolis would help here.

78. Pg 3-5 -- The operating phase/long term impacts section only talks about transit trips; there are many other long term operating impacts. Are those in other sections? Reference them here. I know this is focused on transportation; what about lane changes, etc. with transit malls and otherwise altering character of West Broadway?
79. Pg 3-5 -- Table 3-3: Lowry Avenue Station referred to as North Memorial Lowry - I think the correct name is just Lowry (in other areas); please adjust.
80. Pg 3-6 -- Table 3-3: Update projected weekday daily boardings with latest ridership model, based on 2050 population and employment forecasts that reflect increased development potential in Minneapolis per city's comprehensive plan.
81. Pg 3-5 -- Please provide additional detail describing the different ridership model assumptions that could explain differences in station level ridership between the models.
82. Pg 3-6 -- Wouldn't long-term impacts to local service (e.g., changes to the Route 14) potentially be a long-term adverse impact?
83. Pg 3-7 -- Do you have a map of the PLTS to show?
84. Pg 3-7 -- Section 3.2. Consider including the City of Minneapolis Vision Zero High Injury Streets Network in describing the pedestrian facilities and challenges in the project area.
85. Pg 3-7 -- The PLTS does not seem to include a relevant metric for analyzing the effect on comfort levels of pedestrians adjacent to LRT or crossing LRT facilities. This should be incorporated in the analysis as there are many locations along the alignment where sidewalks are immediately adjacent to LRT tracks and where pedestrians cross LRT tracks.
86. Pg 3-9 -- When the Lowry Avenue station description and analysis reflects that the location is shared between Minneapolis and Robbinsdale, walkshed, etc. will change. Will this change ridership forecast or other data points for that station?
87. Pg 3-9 -- When including narrative about improved pedestrian experience, please include transit mall on 21st Avenue North (not just 10th Avenue North).
88. Pg 3-11 -- Regarding this sentence: "Additional minor improvements on West Broadway Ave west of Logan Avenue North and Washington Avenue North between Broadway Street NE and Plymouth Avenue would remain uncomfortable for most users." Sidewalk improvements and ADA ramps will be improved along the entire stretch, correct? This will be much more comfortable than what exists currently. Also, inclusion of boulevards, etc. will help with pedestrian environment and comfort.
89. Pg 3-11 -- Regarding this sentence: "Additional minor improvements on W Broadway Ave west of Logan Ave N and Washington Ave N between Broadway St NE and Plymouth Ave..." Should be West Broadway not Broadway St NE, which is across the river.
90. Pg 3-11 -- For Minneapolis section, please include summary of pedestrian changes (i.e., number of crossings added/removed, intersection upgrades, etc.). This is included for the other cities.
91. Pgs 3-11 and 3-12 -- Analysis should include turning radii at intersections; many of these intersections may have negative effects for pedestrians due to turning movement constraints as a result of center running tracks.
92. Pgs 3-11 and 3-12 -- Analysis described in the appendix does not accurately portray recent design modifications. Is this analysis based on the municipal consent plans?
93. Pg 3-12 -- Lyndale Avenue North: Pedestrian crossings have been closed at 21st Avenue North and Dupont Avenue North and 21st Avenue North and 6th Street North with the proposed design. Clarify why a traffic signal is an improvement for pedestrians.

94. Pg 3-12 -- Plymouth Avenue: There is an existing crossing at Washington Avenue North and Plymouth Avenue and 10th Avenue North today. Different rationale needed for this analysis.
95. Pgs 3-11 and 3-12 -- The summary of proposed changes in Table 3-7 does not use the metrics identified in section 3.2.1 as the methodology for the analysis. What is the change in sidewalk width, sidewalk surface condition, type and width of buffer between sidewalk and roadway, prevailing speed of vehicle traffic and number of vehicular travel lanes on the adjacent roadway and general land use of the area? These metrics are also not described in the appendix.
96. Pg 3-12 -- Why are Penn Avenue changes listed as neutral? What is listed are all improvements.
97. Pg 3-12 -- For Lyndale station, elimination of crosswalk at Dupont Avenue North is hard to consider an improvement. What about listing the 21st Avenue North transit mall for this and the James Ave station?
98. Pg 3-12 -- For Plymouth Avenue station - why talk about bikeway in pedestrian section? If including, mention bikeway connections at James and Lyndale stations.
99. Pg 3-12 -- Section 3.2.4: Pedestrian mitigation area -- More needs to be said about crossing West Broadway with LRT. What sort of loss of access from a pedestrian perspective is there, etc. This summary area is an area where it is important to distinguish between the more urban Minneapolis section vs other parts of the alignment.
100. Pg 3-12 -- Section 3.2.4: Says detour routes would generally be provided; wouldn't they always be provided? We request they are properly marked and provided per TAP street operations strategy 9: <https://go.minneapolismn.gov/final-plan/street-operations/strategy-9>.
101. Pg 3-12 -- Include number of pedestrian crossings reduced per city.
102. Pg 3-12 -- Detour routes need to be provided for short- and long-term sidewalk closures and should comply with new PROWAG guidance for accessibility.
103. Pg 3-12 -- Can you add map of BLTS?
104. Pg 3-12 -- Shared traffic streets should only be considered bicycle facilities under certain conditions (e.g., low vehicular volumes, wayfinding for bicyclists, where traffic calming and reduction strategies are present).
105. Pg 3-13 -- Isn't it standard to include bike parking at all LRT stations? Document says at many, but not all.
106. Pg 3-13 -- The BLTS does not seem to include a relevant metric for analyzing the effect on comfort levels of bicyclists adjacent to LRT or crossing LRT facilities. This should be incorporated in the analysis as there are many locations along the alignment where bikeways are adjacent to LRT tracks and where bikeways cross LRT tracks.
107. Pg 3-15 -- Inaccurate description about bike facilities being unknown on West Broadway and 21st Ave N (top paragraph).
108. Pg 3-16 -- There are planned bike improvements between 21st and Broadway that should be mentioned (curb protection Emerson and Fremont, and James), and links to Queen Bike Boulevard, planned Northside Greenway and North 2nd Street that are worth mentioning.
109. Pg 3-16 -- Penn Ave in chart: Include rerouting of Queen Bike Blvd.
110. Pg 3-16 -- Table 3-9; Penn Ave: "Vehicle-free" makes it sound like there were no vehicles in the turn lane; suggest updating terminology.
111. Pg 3-16 -- Table 3-9; Penn Ave: Not sure why eliminating McNair Avenue from intersection is a benefit for bicyclists. Suggest mentioning the new protected bikeway connection from McNair

- Avenue to Queen Avenue instead. Crossing at Newton Avenue is not clearly a bikeway improvement, since there's no bikeway on Newton Avenue.
112. Pg 3-16 -- James Avenue in chart: Change text to talk about bikeway improvements, including Northside Greenway routing and connections to North Commons park.
 113. Pg 3-16 -- Lyndale Avenue in chart: Eliminating ped crossing at Dupont Avenue doesn't seem like an improvement. Consider including connections across I-94 and to City's 2nd Ave project.
 114. Pg 3-16 -- Lyndale Avenue in chart: Protected/sidewalk grade bikeway needs to continue through intersection of W Broadway and Lyndale or this could be seen as neutral or negative (putting bicyclists on-street unprotected at a high stress intersection).
 115. Pg 3-16 -- Plymouth Ave in chart: The crossing to access the station is a designed as a pedestrian crossing, not as a bikeway crossing, so should not be in this chart. Update summary text to reference the addition of a protected sidewalk-grade bikeway on Washington with the proposed project and intersection safety improvements for bicyclists at Plymouth/Washington and 10th/Washington.
 116. Pg 3-16 -- Section 3.3.4 talks about short term bicycle closures and noting detours might not be provided; these will be needed.
 117. Pg 3-16 -- Detours for short-term and long-term closures must be provided for biking and walking.
 118. Pg 3-17 -- It says "Several roadways...would undergo modifications as part of the Project, and those are described in detail in Chapter 2." Where in Chapter 2 is this described?
 119. Pg 3-18 -- Need to share what forecasted growth rate was assumed for no build analysis.
 120. Pg 3-19 -- Impacts of Lowry Station-related traffic analysis should also be shared under Minneapolis, not just Robbinsdale.
 121. Pg 3-20 -- Recommend being clear that reconstruction of West Broadway is from western City boundary to Lyndale, and around intersection of Washington, and then will be coordinated with a reconstruction project to the river.
 122. Pg 3-20 -- Access from both Thomas Ave and 27th Ave on the north side are eliminated.
 123. Pg 3-20 -- Sheridan becomes a right in/right out in addition to through access being eliminated.
 124. Pg 3-20 -- Operational changes at Queen and 24th seem to be about the station location, not to make room for LRT tracks as noted.
 125. Pg 3-20 -- Recent design concepts shared with city have shown vehicular access remaining at Logan Ave, including the left turn lane from W Broadway to Logan. This should be reflected in SDEIS.
 126. Pg 3-20 -- Note access changes to Newton, Morgan, Illion, Knox, Girard, Fremont, Emerson, Dupont, Bryant, Aldrich, Lyndale, and 6th.
 127. Pg 3-20 -- Pedestrian and bicycle sections should include a detailed list of access and operational changes similar to Table 3-14.
 128. Pg 3-20 -- Eastbound I-94 exit ramp to West Broadway should include two lanes generally and no driveway access lane.
 129. Pg 3-20 -- Regarding access on 10th Ave - text says "emergency bus access is retained" Will buses be using that street on a daily basis or only for emergencies?
 130. Pg 3-20 -- Note access changes to 18th Ave, 16th Ave, 15th Ave, 14th Ave, 12th Ave, 10th Ave, 3rd St, 4th St, 5th St; all east of I-94.
 131. Pg 3-20 -- Table 3-15 title needs to be changed to include intersections exceeding and at capacity, per the previous paragraph.

132. Pg 3-20 -- Table 3-15 does not include all intersections that will be exceeding or at capacity according to following map (Figure 3-5) and information shared with Minneapolis Traffic and Parking staff through bi-weekly meeting series.
133. Pg 3-20 -- Spell out LOD.
134. Pg 3-20 -- Are parking impacts on West Broadway from Irving to Lyndale, and on connecting streets between 21st Ave and West Broadway included in this analysis?
135. Pg 3-26 -- Table 3-18 does not include loss of parking in North Loop under the viaducts; should be included.
136. Pg 3-26 -- Table 3-18 does not include loss of parking on W Broadway between Irving and Washington for reconstruction; should be included.
137. Pg 3-26 -- Table 3-18 should include parking loss at the City-owned lot adjacent to Capri theater.
138. Pg 3-27 -- Figure 3-7 does not include 8th and 9th Ave impacts on lots under the viaduct nor the parking loss along West Broadway and any connecting north/south streets between 21st Ave N and West Broadway; all should be shown.
139. Pg 3-27 -- Figure 3-7 should show entirety of Minneapolis, including Lowry station in northwest.
140. Pg 3-28 -- Figure 3-8 does not include the lot adjacent the Capri theater. Are there no impacts to the off-street parking spaces as part of the BLRT project?
141. Pg 3-28 -- Figure 3-8 should show Broadway Flats and City-owned parcels.
142. Pg 3-29 -- Parking inventory and utilization studies have been completed. When will this information be made available to the public either through the environmental documentation or another venue?
143. With the conversion of 10th Ave to a transit mall, more details on impacts to both Metro Transit buses that travel to/from new bus garage and Fire Trucks using Station 4 needs to be documented, including number of buses that will regularly use the transit way and/or other diversions of bus traffic to get to and from the Metro Transit North Loop bus garage.
144. The bikeway on James Avenue from James Avenue station should not end midblock but extend through the intersection of Golden Valley Road, linking to North Commons Park.
145. Please analyze school bus operations along the corridor, both during construction and in the build condition. Drop-off and pick-up zones, especially near schools will need to be identified. This should include a school bus operations and access plan for the Twin Cities International School.
146. The project should preserve the ability to remove the North Loop 3rd/4th Street viaducts, embankments, and ramps off I-94 into downtown, without the City being held financially responsible to move LRT infrastructure and traction power substations in the future.
147. During construction, the project should develop a parking mitigation plan for neighborhoods, as well as dedicated off-street parking for construction crews to lessen the construction impacts on local residents and businesses.
148. Consider additional traffic and pedestrian safety measures along Washington Ave in the North Loop for better last-mile connections to the proposed Plymouth Ave Station, including a Rectangular Rapid Flashing Beacon and a pedestrian refuge at the intersection with 7th Ave.
149. Train crossing gates are proposed at Theodore Wirth Parkway, the project office should share the average traffic delays and anticipated number of daily gate closures.

Appendix A-3 Traffic and Aviation Documents

- 150. There is no Traffic Operations Technical memorandum for Minneapolis between Lowry Ave Station and I-94 - please provide a traffic operations technical memorandum for this area.
- 151. The City of Minneapolis applies a negative annual vehicle volume growth rate for traffic models in order to meet the City's Transportation Action Plan goal of reducing vehicle miles traveled by 1.8% per year. <https://go.minneapolismn.gov/minneapolis-streets-2030> See Street Operations Action 3.1: Plan and design for zero or decreasing motor vehicle trip growth <https://go.minneapolismn.gov/final-plan/street-operations/strategy-3> The City encourages the Blue Line Extension traffic team to apply a negative annual vehicle volume growth rate approach in its traffic model, and focus models on people throughput instead of vehicle throughput.
- 152. Provide signal justification reports for all existing and proposed signalized intersections in the project area.

Appendix A-3 Transportation

- 153. Narrative refers to pedestrian and bicycle customers; this project will influence much more in walking/biking conditions than only those that pertain to customers of the LRT; recommend referring to larger impacts in neighborhoods this project goes through (e.g. look at impacts in Project Area, like for vehicles, vs. for customers).
- 154. Why is target year 2026 in Figure A3-1?
- 155. Figure A3-2: Please zoom in (in separate call out) to understand what local routes are impacted in North Minneapolis.
- 156. Figure A3-2: Still showing old routes; please update with the one route in Minneapolis currently being considered.
- 157. Narrative talks with uncertainty about alignment; please update to reflect proposed project.
- 158. Table A3-2 talks about Emerson-Fremont one or two station options; please update to reflect current realities on project.
- 159. Table A3-3 talks about Emerson-Fremont one or two station options; please update to reflect current realities on project.
- 160. Table A3-3 talks about Lyndale vs East of 94 option and Broadway vs 21st options; please update to reflect current realities on project.
- 161. 3.1.4.1 talks about flyover and Broadway bridge options; please update to reflect current realities of project.
- 162. 3.1.4.1 narrative says: "While an additional station would result in a loss of ridership due to slower travel time, the loss would be offset by improved access to the LRT." We agree that access to LRT is necessary to meet project goals and offsets slight increases in operating time.
- 163. 3.1.4.1 narrative talks of Lyndale option; please update to reflect current realities of project.
- 164. Revise the multiple options under east of 94 option and eliminate Lyndale option.
- 165. Please share maps of Pedestrian- and Bicycle- Level of Stress maps that were used in this section.
- 166. Figure A3-6 does not show northern limits of work and walksheds in Minneapolis; the Lowry Ave station must be reflected as a City of Minneapolis station (as well as Robbinsdale).
- 167. Figure A3-6 should not show the Lyndale or Broadway bridge options.
- 168. Figure A3-6 should show the other station being talked about in Minneapolis - Washington @ Broadway, so we can see potential impacts. This is a more relevant piece to include since, at minimum, the alignment is preserving ability to build this (vs. older alignments that are no longer being considered).

169. Table A3-4 needs to be updated to only reflect alignment being considered.
170. Table A3-8 needs to be updated to only reflect alignment being considered.
171. Narrative needs to look at not just station related changes, but generally, ped access between major destinations along West Broadway. Are we bringing a community together, or making it harder to cross? Improving safety even if level of stress is still high? Is level of traffic stress right measure, when we know plans show moving from a more dangerous street type (4 lane undivided) to a safer one (one lane in each direction, typically with signalized intersections and/or ped median refuge)? We need to zoom out a bit and look at (and reflect) the big picture.
172. Narrative needs to be updated to only reflect alignment being considered.
173. Narrative should highlight preserving the long-term potential of opening up Dupont, including for pedestrians.
174. Total number of crossings across Broadway under no build and under proposed alignment needs to be clearly stated.
175. Refer to real numbers vs. 'slight reduction in legal crossings'.
176. Narrative should highlight new pedestrian crossing over 94 at 21st Ave N.
177. 3.2.5.2 narrative: In Minneapolis, pedestrian detours must always be provided, short or long term.
178. Figure A3-7: Still are showing old routes; please update with the one route in Minneapolis currently being considered.
179. Figure A3-7: Legend says Hennepin County bike routes; in Minneapolis, those are defined by Minneapolis, not HC.
180. Narrative talks about options still under consideration; update to reflect project decisions to date.
181. Figure A3-10: Eliminate the various options not being pursued and include planned bicycle improvements (e.g., Northside Greenway connection at James station); complicates what is being looked at.
182. Narrative talks about removing bike access on 21st Ave N - this is the opposite of what is being proposed. Please update.
183. Table A3-11: Update to reflect not multiple options of alignment but the one proposed.
184. Table A3-14: Update to reflect not multiple options of alignment but the one proposed.
185. Table A3-14: Add info about Northside Greenway at James and Queen Ave bike boulevard at Penn Stations.
186. 3.3.5.2 - Need to provide bicycle detours (short and long term) in Minneapolis per our Complete Streets Policy.
187. Figure A3-8: Eliminate the Lyndale Ave option from the map; this is not being pursued.
188. Table A3-23: Reflect City comments 12-124 in Chapter 3 on access changes.
189. Narrative and Table A3-23: there is only one alignment in Minneapolis; update to reflect current proposed project.
190. Note access and neighborhood traffic circulation changes in East of I-94 alignment options.
191. N 21st Ave options - all motor vehicle traffic is proposed to be removed from 21st Ave N.
192. For SFEIS, update traffic analysis and mitigations options proposed in biweekly BPO-City Traffic IRT meetings.
193. Narrative and Table A3-24: there is only one proposed alignment in Minneapolis; update to reflect current proposed project.
194. Narrative - Update to reflect current project proposed alignment only.

195. Table A3-29 - Eliminate. Not an option being considered.
196. Section 3.4.5 - Needs to reflect that traffic impacts are not the sole criteria for determining mitigations. Street widening and vehicle capacity expansion run counter to the city's climate goals and transportation action plan goals. Changes to the Olson Memorial Hwy/N 7th St/N 6th Ave intersection should be coordinated with the city's North 7th Street reconstruction project and the MnDOT TH 55 project, which both seek to reduce vehicle capacity. Upgrades to active transportation facilities and bus transit service in this area should also be considered, such as dedicated bus lanes and protected bike facilities, to further the city's mode shift goals.
197. Narrative talks about 'all options in Minneapolis' - refine for project description as is.
198. Table A3-32 needs to include all corridors in Minneapolis - not just Broadway - including 21st, 10th, Washington, etc.
199. Table A3-32 needs to not include all the options, just the one proposed.
200. Figure A3-10 - Eliminate Lyndale option and focus only on proposed project.
201. Figure A3-11 - Eliminate old options and focus only on proposed project.
202. City of Minneapolis parking narrative: Eliminate narrative on old options and describe actual impacts of proposed projects.

Chapter 4 Community and Social Analysis

203. Pg 4-14 -- Section 4.2.2.4, third to last sentence has a missing word.
204. Pg 4-14 -- Section 4.2.2.4, second paragraph, first sentence has typo and is incomplete sentence.
205. Pg 4-17 -- Section 4.2.3.1, Minneapolis section: In the first sentence "with the addition of a bicycle facility" implies that the bicycle facility is part of the impact, which doesn't seem to be the intent.
206. Pg 4-18 -- Section 4.2.3.1, Minneapolis section: This section needs a more detailed discussion of pedestrian crossings along the corridor.
207. Pg 4-18 -- Section 4.2.3.2, Minneapolis section: Construction phase (short-term) impacts should mention businesses.
208. Pg 4-22 -- Table 4-13 Acquisitions and Relocations Required for the City of Minneapolis. 27 relocations are identified as part of the 26 required full parcel acquisitions. The City recommends that the Project Office continues to collaborate with the City and Project Partners to identify opportunities for replacement properties in the city and along the project corridor. With all impacted tenants identified within EJ communities, a concerted effort is needed to ensure long-term tenancy of these tenants in their desired replacement properties.
209. Pg 4-25 through 4-29 -- Section 4.4.2 would benefit from a listing of the APE distances from the alignment and stations in feet.
210. Pg 4-37 -- Typo in Table 4-16 line KVP17, Capri rather than Capris.
211. Pg 4-41 -- Economic Effects. Regulatory Context and Methodology. The methodology for determining economic impacts is not adequate and doesn't include an assessment that evaluates the relationship between the build alternative's impact on local economic development and the ability of existing households to maintain tenancy within the project area after the long-term impacts are realized. This analysis should supplement the second category of long-term economic impacts as it relates to operation of the transportation facility with relation to the activity of "increase in desirability of properties, resulting in increased in property values". The project office should re-evaluate the direct effects of the investment of the project, its relationship to increase in property values; and the ability of residents and businesses to continued tenancy within the project area.

212. Pg 4-42 -- Economic Effects. Study Area and Affected Environment. The application of the study area is not consistently applied across topical areas in Section 4.6 Economic Effects.
- o When looking at the impacts on economic development effects - this is analyzed at the Minneapolis-St.Paul-Bloomington MSA. However, when looking at the effects on tax revenue and appreciation of property values - those impacts are hyper localized within the study area of up to 1 mile within the project alignment. While these effects may lead to a net positive benefit on the regional economic activity - the impacts related to the Build Alternative will be realized by communities within up to 1 mile of the project alignment. Additional discussion should be had on long-term economic impacts on communities within 1 mile of the alignment to alignment.
213. Pg 4-45 -- Economic Effects. Broader Economic Impacts. Operating-Phase (Long-Term) Mitigation Measures. This section does not adequately identify mitigations or long-term impacts.
214. Pg 4-45 -- Economic Effects. Broader Economic Impacts. Design/Construction Phase (short-term) Mitigation Measures. The City would like to see further development of proposed mitigation commitments for construction phase impacts. The mitigation commitments should consider the criteria of beneficiaries that would be most likely to be impacted with consideration of minimize barriers for EJ communities to access these supports. Mitigations should range from direct supports to individuals and businesses, and range in scale of impact such as a city block or broader neighborhood-level investments.
215. 21st Ave N – Currently primarily a residential street, not a major commercial corridor. Please expand analysis on how to improve perception of public safety near stations and along 21st Ave N, and develop public safety mitigations along 21st Ave N.

Appendix A-4 Archaeological and Architectural History Reports

216. No additional comments: this topic will be covered by the 106 process.

Appendix A-4 Community and Social Analysis

217. No additional comments; please apply Chapter 4 comments to the appendix.

Appendix A-4 Cultural Resources Document

218. No additional comments.

Appendix A-4 Cultural Resources Technical Report

219. The Plymouth Masonic Building (HE-MPC-8090) at 1912 Emerson-1025-1035 West Broadway has previously been identified as NRHP eligible in a city study: "A Corridor Through Time" (2001). It is also in the 4(f) chapter. It is not shown on the maps or text on pages 4-25 through 29.
220. The North Branch Library at 1834 Emerson Ave N is a NRHP landmark and is not shown on maps. It is within 200 feet of the alignment.

Appendix A-4 Visual Quality Technical Report

221. Pgs 16, 38, 41, and Table 3 -- Capri Theater rather than Capris.
222. Section 6.2.1, p 46, cutoff and shielded lighting fixtures are additional lighting mitigation strategies.
223. Pg 90 -- Does not have photo renderings for KPV 16-23 in Minneapolis.
224. Viewsheds of Theodore Wirth Parkway and Victory Memorial Parkway should be analyzed based on the latest at-grade design concept.
225. City of Minneapolis staff have reviewed sections related to MPRB property. We have not identified major issues but defer to MPRB for determinations related to MPRB property.

Chapter 5 Physical and Environmental Analysis

- 226. Pg 5-4 -- Franchise agreements in the City of Minneapolis are with privately owned utilities, not those owned by the city.
- 227. Pg 5-4 -- Would public and private utilities need to conform to MnDOT's Utility Accommodation on Highway Right of Way Policy for locations where the utilities are not location in MnDOT ROW, if so, why? If not, what are the applicable governing regulations?
- 228. Private water service lines that require relocation or replacement due to the Project shall be paid for by the Project and follow City Standards for replacement. Any portion of any private water service line containing lead or galvanized iron that requires relocation or replacement due to the Project shall be replaced with Type K copper at the expense of the Project per *Division WM3.17C.8. of the Supplemental Specifications For the Construction of Public Infrastructure In the City of Minneapolis*, latest edition.
- 229. Pg 5-7 -- Figure 5-3: The utility lines are overlapping, many of them are not visible on this map. It should be adjusted to show where each of the types of utilities are located.
- 230. Pg 5-8 -- Impacts to Bassett Creek Tunnel should be identified and mitigated as necessary.
- 231. Pg 5-8 -- Relocating manholes in conflict with the project area without relocating the associated sanitary or storm main may not be sufficient to provide adequate access. Additional mitigation where access to sewers occur may be necessary.
- 232. Pg 5-8 -- There is no mention of the impacts to the sanitary and storm sewer on 21st Ave N, which may be significant. Relocation of sanitary sewer off of 21st may eliminate public sewer access to properties that do not have frontage along the cross streets.
- 233. Large water mains adjacent to the light rail tracks will need to be cathodically protected under the tracks and isolated on either side of the future track alignment. Encasement of water mains may be necessary. Water mains underneath the track alignment should be inspected annually.
- 234. Pg 5-9 -- Maintaining current service levels for utilities may not be sufficient depending on how the project impacts development and density in the area. This should be evaluated to determine if higher levels of utility service are being driven by the project, and therefore should be mitigated.
- 235. Pg 5-10 -- Table 5-2, Shingle Creek is also in Minneapolis.
- 236. Pg 5-44 -- Section 5.6.2.1: There are 13 long term locations collected for noise measurements, not 12 as described in the paragraph.
- 237. Pg 5-48 -- City of Minneapolis section 5.6.3, first sentence "between Target Field and 21st Ave N" Is this correct or is Lowry the northern extent of noise monitoring?
- 238. Will the specific properties impacted by noise and/or vibration be shared publicly at this stage?
- 239. Pg 5-52 -- The locations with vibration impacts should be summarized and a map provided in the chapter and not direct the reader to the appendix to see their results.
- 240. Pg 5-65 -- Hennepin County and MnDOT should be included in the organizations with stormwater requirements.
- 241. Pg 5-72 -- Add Minneapolis Greenhouse Gases (GHG) reduction goals.
- 242. Pg 5-76 -- Spell out and describe BMPs in the text the first time this is used.
- 243. Pg 5-77 -- Why would energy use for buses increase in build scenario? Include more information.
- 244. Washington and West Broadway station should be included in analysis, since one/two stations on 21st, West Broadway and Lyndale Ave N options were all analyzed.

Appendix A-5 Biological Environmental Document

- 245. Pg 8 -- Figure 1.4.5.1: Update project map study area to reflect built alternative.

246. Pg 8 -- Figure 1.4.5.1: Update and clarify project map study area to reflect an alignment that is primarily at-grade, not elevated structure.

Appendix A-5 Biological Environmental Technical Report

247. The City of Minneapolis encourages the Blue Line Extension project to work with the City to implement Green Stormwater Infrastructure and Sustainable Landscaping. Green Stormwater Infrastructure is a set of green infrastructure practices that also capture and treat stormwater. They do this by infiltration, filtration, or detention. Sustainable Landscaping is a set of practices that work with natural environment. They help to sustain local habitat, conserve energy and water, and improve air and water quality and user experience. Examples include trees and native plants. Operations and maintenance agreements for implementing these practices along the alignment will need to be established.

Appendix A-5 Noise and Vibration Technical Report

248. Pg 19 -- Table 4-1 includes reference noise levels for LRT on embedded track. How do these reference levels change with turning tracks, aged tracks, etc.?
249. Pg 25 -- When determining where to locate the sensor relative to the "project location", how is project location defined? Is that from the edge of the tracks, centerline of track bed, etc.?
250. Pg 34 -- Why was no location on 10th Ave N used for vibration testing? V-A is on the opposite side of the freeway trench and much more likely to have different ground conditions than the area around Washington and 10th Ave N, especially given the relative proximity to the river, urban context and concentration of underground utilities, including the Bassett Creek Tunnel and Xcel transmission line. This is also the area where deeper excavation may be required, given the existing underground utilities.
251. Pg 46 -- Table 6-7: Why are project impact noise levels so much lower than the reference noise levels on page 19?
252. Pg 60 -- If the construction-related vibration impacts can't be summarized until final design, what is the purpose of the SDEIS? How can the city be asked to provide municipal consent without knowing the potential impacts from construction on adjacent properties? There are many properties along the alignment that are very close to the alignment that could be permanently impacted or damaged by construction.
253. Pg 67 -- The location for LT-13 appears to be on a second story balcony and is not 4-6 feet from the ground as described in the methodology. How does this impact noise levels experienced by ground floor residents?
254. Pg 72 -- The location for LT-4 (2239 W Broadway Ave) appears to be behind a large tree. Wouldn't this dampen noise captured by the sensor?
255. Pg 72 -- 1927 Morgan Ave is a parcel away from W Broadway (approximately 150' from the center of the street). How is this representative of other properties that front West Broadway? The elevation of the property and sensor is also higher than those properties adjacent to West Broadway.
256. Pg 73 -- 2117 Dupont Ave is 2 to 3 parcels away from 21st Ave N (approximately 180' from the center of 21st Ave N). How is this representative of properties that front 21st Ave N?
257. Pg 73 -- 2741 Upton Ave is located on a hill and a retaining wall adjacent to West Broadway. How is this representative of properties that are located directly on West Broadway?
258. Will the specific properties impacted by noise and/or vibration be shared publicly at this stage?

259. The locations with vibration impacts should be summarized and a map provided in the chapter and not direct the reader to the appendix to see the results.

Appendix A-5 Physical and Environmental Analysis

260. Pg 7 -- Figure A5-3 does not provide the level of detail necessary to identify major utility locations.
261. Pg 12 -- There are also private sanitary and storm sewer connection to the publicly owned sanitary and storm sewers. The project will likely have impacts on these that should be identified.
262. Pg 12 -- MnDOT also owns storm sewer along the corridors.
263. Pg 12 -- Table A5-4 is not a complete list of sanitary sewers in the study area for Minneapolis.
264. Pg 12 -- Records do not suggest an 86" diameter brick sanitary sewer running under Lyndale Ave and 7th St N at 8th Ave N. Is this meant to be under 8th Ave N?
265. Pg 13 -- There is not a 60" diameter RCP crossing CR 81 at Logan Ave.
266. Pg 14 -- The 144" Bassett Creek Tunnel is not RCP.
267. Pg 15 -- Verify where or why utilities must conform to MnDOT's Utility Accommodation on Highway Right of Way Policy, especially if the utilities are not located in MnDOT ROW. Verify what the correct regulation for utilities is.
268. Pg 15 -- If utility relocation design necessitates work outside of the identified project limits, how will this be addressed with approvals? It is likely utility work will occur outside of what is currently shown as the project limits.
269. Pg 16 -- It does not appear the utility impacts have been fully evaluated. The claim that the Lyndale Ave N to West Broadway option presents the greatest number of potential utility impacts does not seem justifiable.
270. Pg 17 -- Maintaining current service levels for utilities may not be sufficient depending on how the project impacts development and density in the area. This should be evaluated to determine if higher levels of utility service are being driven by the project, and therefore should be mitigated.
271. Pg 43 -- What additional investigations will be performed to identify potential risks (and mitigation necessary) due to karsts?

Appendix A-5 Water Resources Technical Report

272. Pg 88 -- Hennepin County and MnDOT should be included in the organizations with stormwater requirements.
273. Regulatory responsibility for the right-of-way will impact which stormwater management requirements will apply to different portions of the project and will need to inform conversations regarding long term ownership and maintenance responsibilities of any stormwater management BMPs.
274. This report should show aerial maps of the Minneapolis station areas and identify nearby wetlands, even if none are present in the station area.
275. This report should show aerial maps of the Minneapolis station areas and identify nearby floodplains, even if none are present in the station area.

Chapter 6 Indirect Impacts and Cumulative Effects

276. Pg 6-3 -- From the chapter, NCHRP's Report 466: Desk Reference for Estimating Indirect Effects of Proposed Transportation Projects,¹⁰ which states that "development effects are most often found up to one-half mile around a transit station." This further supports the addition of station at Washington and West Broadway.

277. Pg 6-3 -- Many of the resources of interest identified in the chapter are also impacted by tracks, not just the location of the station.
278. Pg 6-7 -- Referencing "Politics and Freeways: Building the Twin Cities Interstate System" to define freeway "eras" seems arbitrary and not relevant. Who is "falling behind?" The rate at which highways were being built, the failure to acknowledge the disparate impacts to community with highway projects, etc.?
279. Pg 6-7 -- Section 6.1.3.1. Understanding that the time frame for this chapter is 1960 to the present it would still be worthwhile to include the east-west CP rail line and Humboldt Yards as a major barrier across the north side east to west north of the project.
280. Pg 6-8 -- Timeline on top of page: I-94 was constructed through north Minneapolis in early 1980s.
281. Pg 6-8 -- Harms Associated with past projects section. This section could mention CP rail corridor and Humboldt Yards as well as TH 55 as major barriers.
282. Pg 6-8 -- Remove "unfortunate" from sentence: Transportation projects in the Project area, and in the Twin Cities Metropolitan Area more broadly, have an unfortunate history of displacing residents. This makes it seem like this impact couldn't have been known before the projects were implemented.
283. Pgs 6-10 and 6-11 -- Pedestrian and bicycle use is expected to increase on more facilities than noted in the bullets. Add "pedestrian facilities along and adjacent to the alignment" and note bikeways in addition to trails (see TAP AAA map for reference).
284. Pgs 6-10 and 6-11 -- Also note the need for additional bike parking facilities at and near stations to accommodate additional bicycle trips to and from transit.
285. Pg 6-11 -- Update this sentence to note that spillover parking can also be an issue where there are no park and rides, especially for businesses and residents who currently utilize the existing parking resources: Spillover parking can result from a lack of park-and-ride lot capacity relative to demand for park-and-ride lot spaces and can affect both businesses and residences by limiting available parking spaces for residents, visitors, customers, and employees.
286. Pg 6-12 -- Will identified "future stations" such as the Washington and West Broadway station be included in station area planning?
287. Pg 6-12 -- Section 6.2.2.1 Land Use Compatibility. City, County, Met Council and FTA policy all call for TOD in station areas. TOD is mixed-use, mixed-income, multi-story development. This new construction makes ground floor commercial space higher rent, which can have a displacement effect. Mitigation is necessary for this factor including, but not limited to, TOD funding sources and the ADWG work.
288. Pg 6-13 -- Cumulative and individual acquisition impacts should seek to be lessened, not only cumulative.
289. Pg 6-15 -- Suggest rephrasing sentence to confirm that some businesses will be negatively impacted (i.e., necessary relocations due to project impacts): Although it is possible for individual businesses to be affected negatively, the overall (cumulative) result is expected to be positive, especially if anti-displacement measures and redevelopment are structured to benefit the community.
290. Pg 6-15 -- Community and Social Analysis. Economic Effects. Through the lens of analyzing cumulative effects - the project discusses the net positive effects on property values citing the METRO Blue Line (Hiawatha Line LRT). However, there is inadequate discussion of the median household incomes, disaggregated by race, of households along this alignment over time. The

relationship of property values and household incomes over time needs to be further evaluated to understand the cumulative effects and inform discussions on impacts that could ultimately lead to the displacement of residents and businesses.

291. Pg 6-16 -- Community and Social Analysis. Economic Effects. The relationship of induced development and displacement of residents due to development needs further exploration. For EJ communities, including low-income and high housing cost-burdened households, the prospect of displacement poses a greater challenge in finding housing options that are affordable at levels of moderate and low-incomes along the corridor. The displacement of these households will lead to an increase in demand for affordable housing - which will exacerbate an existing market condition that poses a challenge to increase the supply via new construction due to inflation, rising costs of construction materials, and rising cost of labor.
292. Pg 6-21 -- The Minneapolis Comprehensive Plan does not include plans to reduce parking availability for residents and businesses near stations, and because there are no Park and Rides planned in Minneapolis as part of the project, a different mitigation plan will be needed that is outside of the Regional Park and Ride System Report.
293. Pg 6-22 -- Table 6-4 Visual/aesthetics row, indirect impacts column. City of Minneapolis policy does not require that buildings are built to existing character, but in line with future land use and urban design policies. New larger scale development in station areas is not inherently a visual impact.
294. Pg 6-22 -- The "cumulative effects" column for visual effects references security needs, not visual effects.
295. Pg 6-22 -- Economic effects: These could impact residents and businesses, not just residents.
296. Pg 6-22 -- Will the project implement the recommended anti-displacement strategies?
297. Pg 6-23 -- The project should provide planning and funding assistance to mitigate indirect impacts of development in the area that will create a need for additional or expanded utilities, especially if the project is relocating or reconstructing existing utilities as part of the project.
298. Pg 6-24 -- Why would the combined effects of the project and W Broadway reconstruction lower noise impacts? This was not explained in the preceding chapter text.
299. Pg 6-24 -- Is the project implementing BMPs to reduce the cumulative effect on water quality and stormwater from induced development?
300. Pg 6-25 -- How did the analysis determine that there would be a decrease in congestion? And what was the analysis that was conducted that compared the improvement in air quality from fewer vehicles on local roads and the decrease in air quality from trips induced by additional development, and found that there would be an overall decrease? The way this conclusion was reached needs to be shown and quantified.

Chapter 7 Environmental Justice and Justive40 Initiative

301. Pg 7-4 -- Methodology. The evaluation of adverse and beneficial effects does not consider and adequately incorporate the past harms as part of the no-build baseline. City staff recommends a more comprehensive representation of these harms such as the disinvestments in housing in "Definitely Declining" and "Hazardous" classified neighborhoods, and the lack of multifamily housing options in "Best" and "Still Desirable" classified neighborhoods due to redlining; the impacting legacy of racially restrictive covenants on EJ communities' ability to build wealth through home and property ownership and the appreciation of those properties; and the existing

built condition of highway and freeway expansion, and the interchanges, - and its relationship with vehicle crashes and injuries to EJ communities.

- 302. Pg 7-21 -- Freeway Development section - I-94 in Minneapolis was built in North Minneapolis in 1980s.
- 303. Pg 7-23 -- Include percentage of non-car households for Hennepin County and state.
- 304. Pg 7-27 -- Section 7.3. This section should detail the engagement of communities along 21st Ave North, too.
- 305. Pg 7-39 -- Update with latest Minneapolis Climate Equity plan goals.
- 306. A couple lines on Figure 7-8 are pointing to the wrong place (Locations with 1 and 3 mitigations got swapped).
- 307. Is or should exposure to industrial pollution be a separate category under historic harms?
- 308. Pg 7-41 -- Table 7-9. Review of Potential Adverse Effects by Topic. City staff does not agree with the following draft determinations of potential adverse effects for the following environmental categories: Economic Effects - We believe there is insufficient evaluation of this the environmental category: Economic effects. See comment above regarding Economic effects: methodology; study area and affected environment, and mitigation measures.
- 309. Pg 7-45 -- Minneapolis section, first sentence, should be 21st Ave N rather than St.
- 310. Pg 7-45 -- Minneapolis section: This section could also detail ped crossings strategy, especially west of James Ave N.
- 311. Pg 7-47 -- Table 7-11 shows number of noise impacted properties. A map of the impacted properties should be included.
- 312. Pg 7-50 -- Indirect and cumulative. While the City agrees with the determination in the draft that the adverse effects of indirect displacement of residents and businesses warrant mitigation commitments, the realm of mitigation commitments should range in beneficiaries that includes direct supports to individuals, businesses, and neighborhood/community level supports AND in investments in public betterments and site improvements on properties such as production of affordable housing units; construction of a supply of commercial-retail spaces; transit-oriented development; and supports for pre-development work.

Chapter 8 Summary of Supplemental Draft Section 4(f) and 6(f)

- 313. Pg 8-1 -- First paragraph, sentence three, should this be 6(f) rather than 4(f) as it relates to conversions? If not there needs to be an explanation of what 6(f) is.
- 314. This chapter has no list or discussion of 6(f) properties.
- 315. The Plymouth Masonic Building (HE-MPC-8090) at 1912 Emerson-1025-1035 West Broadway has previously been identified as NRHP eligible in a city study: "A Corridor Through Time" (2001). It is also in the 4(f) chapter. It is not listed in text or shown on maps.
- 316. The North Branch Library at 1834 Emerson Ave N is a NRHP landmark and is not shown on maps or listed in text. It is within 200 feet of the alignment.
- 317. City of Minneapolis staff have reviewed sections related to MPRB property. We have not identified major issues, but defer to MPRB for determinations related to MPRB property in this report and in Appendix 8
- 318. Pg 8-1 -- Section 8.1 should include a brief outline of the terms in the table: "direct use" etc.
- 319. Pg 8-1 -- Table 8-1 lists Minneapolis Warehouse District as "no use". Is this correct? The project includes substantial changes to the district, such as adding train tracks, re-establishing 8th Ave.

Appendix A-8 Summary of Supplemental Draft Section 4(f) and 6(f)

320. Plymouth Masonic and North Branch Library are listed in tables but not listed on maps.

Chapter 9 Consultation and Coordination

321. Pg 9-2 -- Recommend spelling out all committees in 9.1.2.2.

322. Pg 9-7 -- Additional consideration/description of the intense engagement/focus on Minneapolis routing needs to be more explicitly mentioned in 9.1.3.5 - so much of what has been decided about Minneapolis has been during the September 2022 to now timeframe.

323. Please describe all the different types of engagement: listening sessions vs. community led vs. stakeholder interviews - what is the difference, etc.? Some sort of infographic would help. Or table with summary numbers?

324. Pg 9-12 -- Is 9.1.4.5 referring to legislatively mandated quarterly meetings? If so, would be good to indicate as such.

325. Pg 9-17 -- Spell out OWJs.

326. Pg 9-18 -- Change 21st St bridge section to 21st Ave bridge.

327. Pg 9-18 -- Flagging that 21st Ave bridge with vehicle traffic is not yet mutually agreed to with Minneapolis, pending ownership and maintenance decisions.

Appendix A-9 Agency Coordination and Engagement Reports

328. Agency Coordination - No comments. Compilation of various letters between agencies.

329. Engagement Reports - No comments on this appendix. Compilation of all of the engagement reports and online comments.

Chapter 10 Financial Analysis

330. Pg 10-2 -- When does the project officially reach 30% plans? The city requests that the project include a scenario for O&M cost generation that includes the Washington and W Broadway station.

331. Pg 10-2 -- Construction costs assumed starting in 2026; but not starting until (at least) 2028 - adjust estimate? (10.1.2)

332. Pg 10-3 -- Does the anticipated revenue from fares and MVST and regional sales tax cover the anticipated operating costs in full?

333. Pg 10-4 -- How does the anticipated reduction in vehicle trips as a result of the project affect the anticipated MVST growth?

Chapter 11 Evaluation of Alternatives

334. Pg 11-3 -- Spell out PLTS.

335. Pg 11-3 -- Project does more than just build out multi-use paths. Include more general bikeway improvements/facilities.

336. Pg 11-5 -- Include information on visual aesthetics related to TPSS and catenary infrastructure.

Appendix A-E Construction Engineering Drawings - Lowry

337. Whenever referencing the Lowry Station, it needs to be referred to as both a City of Robbinsdale and a City of Minneapolis station. It is consistently referred to only in the City of Robbinsdale sections, and only shown in Robbinsdale maps.

Blue Line LRT Extension SDEIS Comments (RCA-2024-00703)

Home > Legislative File 2024-00761 > RCA

ORIGINATING DEPARTMENT

Community Planning & Economic Development and Public Works

To Committee(s)

#	Committee Name	Meeting Date
1	Intergovernmental Relations Committee	Jul 9, 2024

LEAD STAFF: Rattana Sengsoulichanh, Community Planning and Economic Development and Kelsey Fogt, Transportation Planning and Programming, Public Works

PRESENTED BY: Rattana Sengsoulichanh, Community Planning and Economic Development and Kelsey Fogt, Transportation Planning and Programming, Public Works

Action Item(s)

#	File Type	Subcategory	Item Description
1	Action	Policy Position	Approving the proposed comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Blue Line LRT Extension, and authorizing submittal of those comments to the Metropolitan Council.

Previous Actions

- 2014-00555 - Blue Line LRT Extension DEIS Comments
- 2016-01108 - Blue Line Extension (Bottineau Corridor) Light Rail Transit (LRT) Project: Final Environmental Impact Statement Comment
- 2022-00459 - Blue Line Extension Route Modification Report: City of Minneapolis comments
- 2023-00806 - METRO Blue Line Extension Project Team update

Ward / Neighborhood / Address

#	Ward	Neighborhood	Address
1.	All Wards		

Background Analysis

The METRO Blue Line Extension is a proposed light rail transit (LRT) route through downtown Minneapolis, north Minneapolis, Crystal, Robbinsdale, and Brooklyn Park that would extend the existing METRO Blue Line to serve local and regional riders and allow a one-seat ride between Brooklyn Park and the airport. The project presents a tremendous opportunity to improve the speed and reliability of transit, make progress towards citywide climate and mode shift goals, extend development opportunities, and better connect neighborhoods to regional destinations and employment centers.

In March of 2016, communities provided Municipal Consent for a proposed route for the Blue Line Extension that anticipated using BNSF Railway right-of-way and entered the city on Olson Memorial Hwy traveling east to Target Field. However, after years of negotiations and due to complications of co-locating LRT in a freight rail corridor, it was decided to shift the project away from the BNSF Railway corridor. In August of 2020, Hennepin County and the Metropolitan Council officially announced a project shift to explore alternatives that would allow the project to move forward without the cooperation of BNSF Railway.

Over the last few years, the City of Minneapolis has worked in close partnership with the Blue Line Extension Project Team (Project Team), which consists of staff from Hennepin County and the Metropolitan Council, to modify the alignment of the Blue Line Extension and identify potential routes through Minneapolis that will best serve the people and businesses of the city, be responsive to community input, and serve project goals. Alignment options reviewed include portions of:

- West Broadway,
- 21st Avenue N,
- Lowry Ave N,
- Lyndale Ave N,
- Olson Memorial Highway,
- Oak Lake Ave,
- 10th Ave N,
- Washington Ave N,
- Plymouth Ave N,
- N 7th St,
- and portions of I-94 right of way.

Each option presented trade-offs on the impact from construction and operation of the train along each reviewed corridor. The Project Team recommended a preferred route to the Minneapolis City Council on August 22, 2023 in order to begin development of the Supplemental Draft Environmental Impact Statement. From the north, the preferred route follows:

- West Broadway in North Minneapolis with stations at Lowry Avenue and at Penn Avenue;
- 21st Avenue North between James Avenue North and Lyndale Avenue North with stations near both of these cross streets;
- Washington Avenue to 10th Avenue North with a station near Plymouth Avenue;
- Oak Lake Avenue to 7th Street North, connecting to Target Field Station in downtown Minneapolis.

In addition, city staff recommended exploring additional stations along the preferred route.

On September 14, 2023, the Corridor Management Committee (CMC), a body which advises the Metropolitan Council and Hennepin County on all issues related to the design and construction of the proposed Blue Line extension project, passed a resolution (metro council.org/getdoc/6fad678-9493-491b-9c54-7de1f4ac6997/BusinessItem.aspx) support of studying the preferred route in the SDEIS. The resolution included an ongoing commitment from the Metropolitan Council and Hennepin County to "advance and identify funding strategies that build community prosperity and prevent displacement" and a commitment that "the parties represented on the CMC would work collaboratively to advance design and evaluate and refine locations and number of stations..."

Supplemental Draft Environmental Impact Statement

Previously, the Project Office completed a Draft Environmental Impact Statement (DEIS) and Final Environmental Impact Statement (FEIS) for the previous alignment of the METRO Blue Line Extension. With the change in the preferred alignment as described above, the FTA and Project Office determined that a Supplemental Environmental Impact Statement (SDEIS) and Supplemental Final Environmental Impact Statement (SFEIS) was needed to evaluate anticipated benefits and impacts with the new preferred alignment.

The Supplemental Draft Environmental Impact Statement (SDEIS) was published by the Federal Transit Administration (FTA) on June 14, 2024. A DEIS documents the potential social, economic, and environmental benefits and impacts of a proposed project or action; a Final Environmental Impact Statement (FEIS) will identify measures to mitigate any adverse impacts in compliance with the National Environmental Policy Act (NEPA). The SDEIS is released to the public and interested agencies for review and comment. The public comment period is open until August 5, 2024. The SDEIS and the Supplemental Final Environmental Impact Statement (SFEIS) comprise the Environmental Impact Statement (EIS) under NEPA. Completing an Environmental Impact Statement is a significant milestone in the Federal Transit Administration's process for securing federal New Starts funding, which may provide 49% of the total project cost and is critical for implementation.

Anti-displacement and Community Prosperity Initiative

Hennepin County and the Metropolitan Council launched an anti-displacement initiative in response to community concerns of displacement due to the impacts of the planning, and potential impacts related to construction and investments of the Blue Line Extension. The University of Minnesota's Center for Urban and Regional Affairs (CURA) was contracted to support in advancing this work, and convening stakeholders representative of the corridor residents and businesses to recommend strategies to ensure that the Blue Line Extension will benefit existing residents and businesses. The outcomes of this anti-displacement initiative are intended to work in tandem with mitigation commitments that will be identified in the SFEIS.

Below is a brief history of the work to date:

- In February 2022, the Anti-Displacement Work Group (ADWG) was formed with the charge of developing a unified vision for anti-displacement and strategies, and consists of stakeholders including corridor residents and business owners, philanthropic partners, and representatives from government agencies including City of Minneapolis staff.
- In May 2023, CURA prepared the Blue Line Extension Anti-Displacement Recommendations Report, that documents the desired outcomes as a result of the implementation of anti-displacement strategies. This includes recommendations of policies, programs, and resource allocation to achieve these outcomes.
- On June 8, 2023, the CMC voted and approved a Resolution receiving the report, and its commitment to working in partnership with project partners, community members, public, non-profit, philanthropic, and private sector partners to attain the report's recommended outcomes, and secure funds and advance strategies needed for implementation for anti-displacement measures before, during, and after construction of the Blue Line Extension.

The next phase of this work is the drafting of the Coordinated Action Plan for anti-displacement that will identify steps for timely implementation of this strategies. The Coordinated Action Plan is anticipated to be published for public review and comment at the conclusion of the SDEIS public comment period.

The SDEIS is organized into the following chapters in addition to the Executive Summary:

1. Purpose and Need
2. Alternatives
3. Transportation Analysis
4. Community and Social Analysis
5. Physical and Environmental Analysis
6. Indirect Effects and Cumulative Impacts
7. Environmental Justice and Justice40 Initiative
8. Summary of Supplemental Draft Section (4F) and 6(F)
9. Consultation and Coordination
10. Financial Analysis
11. Evaluation of Alternatives

Technical appendices A-E through A-9 supplement the 11 chapters above.

Comments

Community Planning and Economic Development and Public Works have compiled comments on the SDEIS. Key themes are noted in this RCA; additional technical comments are attached. In April 2024, the Directors of Public Works and CPED on behalf of the City of Minneapolis, submitted a letter and comments on the draft 30% plans; these comments have yet to be resolved by the Project Office and still hold in addition to the comments below and attached.

Key themes

Purpose and need

- The City of Minneapolis supports the project purpose and need based on the understanding that "the Project would invest in an area that has experienced a history of systemic racism and disinvestment, provide improved connectivity and access for communities in the Project area, and advance local and regional equity. The Project is needed to effectively address long-term regional transit mobility and local accessibility needs while providing efficient, travel-time-competitive transit service that supports economic development goals and objectives of local, regional, and statewide plans."

Station locations

- Whenever referencing the Lowry Station, it needs to be referred to as both a City of Robbinsdale and a City of Minneapolis station. It is consistently referred to only in the City of Robbinsdale sections, and only shown in Robbinsdale maps.
- A station at Washington Avenue North and West Broadway must be constructed with the project to adequately serve the corridor travel shed, provide improved connectivity and access for communities that were impacted by the construction of I-94, support project and city economic development goals, and advance local and regional equity by providing greater access to employment areas. This is in addition to stations at Lowry Avenue, Penn Avenue, James Avenue, Lyndale Avenue, and Plymouth Avenue.

Anti-displacement, property and community impacts

- Continue to work with City and Project Partners to coordinate opportunities for potential replacement properties in the city and along the project corridor in advance of the amendment to the Record of Decision.
- Continue to partner with the City to identify cultural resources in the areas of potential impact and opportunities to minimize and mitigate Build Alternative impacts on those resources.

- Project Office references the Anti-Displacement Working Group (ADWG) Recommendations Report for identifying policy changes and resource re-allocation to support anti-displacement initiatives. However, the Project does not clearly articulate the indirect-impacts and cumulative effects from the Build Alternative, and the possible mitigation commitments for keeping existing residents and businesses within the study area.
- While the project accurately identifies the Environmental Justice (EJ) and Disadvantaged Communities with the project area, it does not go far enough to evaluate impacts and consider the incomes of these communities along the project route compared to the general population of the Minneapolis-St. Paul-Bloomington Metropolitan Statistical Area (MSA) that is defined as part of the study area for 4.6 Economic Effects.
- Parking impacts in Minneapolis need to accurately describe changes to public and private parking (e.g., the anticipated impacts to parking on West Broadway from Irving Avenue North to Lyndale Avenue North and the impacts to parking in the North Loop area under the viaduct as a result of the proposed 8th and 9th Street extensions). Mitigation should consider adopted city parking policies and incorporate transit-oriented design solutions including structured and underground parking.
- City staff have reviewed the 4(f) and 6(f) chapter and appendix and defer to the MPRB regarding no use, de minimis use, and constructive use determinations related to park properties.
- Noise and vibration from the LRT operations must be mitigated.
- Public art must be integrated into project design.
- The Project Team needs to identify and mitigate harms experienced in communities along the previous alignment including communities along Olson Memorial Highway.
- Impacts related to public safety and perceptions of public safety need to be identified and work to coordinate safety-related efforts and/or explicit links to existing Metro Transit public safety efforts need to be documented.
- Lowry Avenue was considered a promising option for the Blue Line Extension but West Broadway was selected as the preferred alternative; as part of providing an integrated transit network serving North Minneapolis, and support of bringing riders to the BRLT, the City supports advancing plans for a Bus Rapid Transit Line along Lowry Avenue.
- The SDEIS and future mitigation should provide a more comprehensive and coordinated analysis of the health costs and benefits of the project as done with the Health Impact Assessment (HIA) for the previous alignment in 2013. A HIA is a process for assessing the potential effects of a proposed policy, plan, or project on the health of a population and the distribution of those effects within the population. The overarching goal is to make the health impacts of decisions more explicit and help shape decisions to improve a population's health.

Design

- The engineering concept layouts included in the SDEIS do not align with designs reviewed by City staff as part of the draft 30% plans and do not reflect more recent revisions discussed with the project team. Notable changes not reflected in the SDEIS layout includes but is not limited to:
 - Lowry Avenue station design;
 - Location and number of pedestrian and bicycle crossings including the proposed signal control;
 - Queen Avenue bikeway connection;
 - On-street parking at Penn Avenue;
 - James Avenue station design;
 - Reconstruction of West Broadway from Irving Avenue North to east of Lyndale Avenue;
 - Reconstruction of Irving Avenue North, Girard Avenue North, Fremont Avenue North, Emerson Avenue North, Bryant Avenue North, Aldrich Avenue North, and Lyndale Avenue North between 21st Avenue North and West Broadway;
 - Pedestrian realm, greening, bikeway design and vehicular lanes on 21st Avenue North between 4th Street North and North 2nd Street and Washington Avenue between 21st Avenue North and 10th Avenue North; and
 - Corridor design including track configuration along 10th Avenue North, 7th Street North, and 6th Avenue North.
- Project design must align with the city's Complete Street Policy and Street Design Guide.
- Pedestrian Level Street Lighting should be evaluated and included as part of the project as appropriate in accordance with the City of Minneapolis Street Lighting Policy and Transportation Action Plan.
- A more wholistic description of changes to pedestrian experience with the introduction of Light Rail on West Broadway would more accurately describe the long-term impacts of the pedestrian experience, versus focusing on intersection-level changes.
- A more detailed analysis of pedestrian crossings eliminated, impacts, and mitigation along West Broadway west of James Avenue North to the city limits is necessary.
- The city requires an agreement with the Project Office on long-term ownership and maintenance to support proposed designs for the 21st Avenue bridge over I-94.

- Safety and security at station locations and routes to/from stations is critical. It is recommended that measures such as (but not limited to) security cameras and street lighting (per the City of Minneapolis street lighting policy) be installed and that station design allows for visibility at stations.
- The City of Minneapolis requires that local stormwater policies and ordinances be adhered to such as the Chapter 54 Stormwater Management Ordinance. Stormwater management, wetland and flood plain mitigation must consider not only the specific area of impact, but broader impacts on the local area and regional system. Stormwater management areas should also consider and not preclude future development potential.
- Traction power substations and signal bungalows must be appropriately placed and the visual impact mitigated. Traction Power Substations should be appropriate for the community context, should be landscaped, should be fenced for safety, and should be designed with architectural fencing instead of chain link fence.
- The project must minimize tree loss; salvage trees where possible and replace trees per the Minneapolis Park and Recreation Board urban tree policy. Boulevard design should be consistent with the Minneapolis Street Design Guide.
- Embedded track should be constructed along the entire length of the project within Minneapolis and must be designed to allow for emergency vehicle access needs.
- Traffic impacts along the corridor need to be mitigated.

Utility impacts

- The preferred alignment has the potential to impact access and structural condition of the Bassett Creek Tunnel, which is a major storm sewer facility serving a large area. Development along this corridor has created additional access challenges to the tunnel. The Project Office should evaluate how access to this tunnel is to be provided, potential structural impacts and mitigate negative impacts as necessary to ensure continued operation of the tunnel in this location is sustainable, including the existing agreement and replacement plan with Metro Transit.
- The document suggests no long-term impacts to utilities are anticipated because the relocation and reconstruction of utilities would maintain current service levels. The project has the potential to drive redevelopment of the area around the project corridor, thereby increasing density. If this is the case, current service levels may not be sufficient for future conditions. Any anticipated increases to population densities along the corridor should be evaluated and mitigation of insufficient utility capacities should be provided for.
- Utilities and street infrastructure disrupted as part of the project must be replaced at the project's expense or through agreement with other utility providers such as Xcel.
- Relocation or replacement of utilities including design (e.g., sizing, possible encasement) and location of the new facilities must be determined in coordination with city staff. The relocation process for the Xcel transmission line under 10th Avenue North must also include community engagement and improvements to the selected corridor in alignment with city plans and policies.

Construction and detours

- Detour routes must be provided for all short-term and long-term closures of pedestrian, bicycle, transit and vehicular facilities during construction, and align with city, state and federal policies, standards and guidelines including the City's Complete Streets Policy.
- Project construction shall be coordinated with other major construction projects in the area occurring at the same time with a plan to minimize disruption of multiple projects.
- Best practices for mitigating and communicating construction impacts for local businesses and residents before construction, during construction and after construction should be implemented.

Mitigations

- Given the scale of impacts and sequencing of the SDEIS, Municipal Consent and SFEIS, the City of Minneapolis requests the Project Office develop a mitigation workplan in advance of the Municipal Consent process, which should describe anticipated mitigations for major impacts in Minneapolis and/or the process to determine mitigations for impacts identified in the SDEIS. Developing this workplan should include coordination with the public.

Next steps

The Metropolitan Council will be responsible for developing the Supplemental Final Environmental Impact Statement (SFEIS). The SFEIS will address environmental impacts at a higher level of detail and will identify mitigation commitments to address the impacts identified in the SDEIS and is expected in Spring 2025.

In July 2024, the Project Office is anticipated to release the Municipal Consent Plans. Pursuant to Minnesota Statutes, section 473.3994, the City of Minneapolis has 45 days after the plans are released to review and approve or disapprove the plans.

FISCAL NOTE

- No fiscal impact anticipated

Racial Equity Impact Analysis

- Blue Line LRT Extension SDEIS Comments - REIA

Attachments

Blue Line LRT Extension Draft Detailed Comments
Blue Line LRT Extension Map
Blue Line LRT Extension SDEIS Presentation

Blue Line LRT Extension SDEIS Comments - REIA

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Section 1: Background

Does this impact one of the City's Goal Areas

Policy Goals

Operational Goals

Public Safety	No
Housing	Yes
Economic Development	Yes
Public Services	No
Environmental Justice	Yes
Built Environment & Transportation	Yes
Public Health	Yes
Arts & Culture	No

Workforce	No
Spending	No
Data	No
Community Engagement	Yes

Describe the impact on selected goal areas.

The project will advance goals and objectives in the Minneapolis 2040 Comprehensive Plan, the Transportation Action Plan, the Climate Equity Plan, the Racial Equity Framework for Transportation and the Vision Zero Action Plan. The Blue Line Light Rail Extension project will connect people to new and existing opportunities and destinations, link people more efficiently to educational and employment opportunities, reduce transit commute times, and increase access to goods and services in an area where building community wealth is a priority. The project will improve public health and reduce pollution by connecting people to quality health care and providing active transportation options and make a generational and unprecedented transit investment in a corridor that has experienced a history of systemic racism and has a high percentage of zero-car households. The extension of the existing METRO Blue Line through North Minneapolis presents an opportunity for improving fast and reliable transit service, supporting citywide climate and mode shift goals, extending opportunities for inclusive economic development and growth, and better connect neighborhoods to regional destinations and employment centers.

This REIA is being updated with the federal publication of the Supplemental Draft Environmental Impact Statement (SDEIS) and provides an opportunity to emphasize racial equity impacts in affected neighborhoods identified in the SDEIS. Actions to mitigate the impacts identified in the SDEIS is a critical component of the Final Supplemental Environmental Impact Statement (FDEIS); this is anticipated in early 2025 and we anticipate updating this REIA at that point. In this REIA, the information and questions will be used to determine if the impacts identified in the SDEIS may disproportionately impact communities along the line and whether investments proposed align with the city's racial equity goals.

Who participated in completing this analysis?

Staff from both Public Works and the Community Planning and Economic Development Department who have been working collectively to represent City interests in this project participated in completing this analysis: Kelsey Fogt, Kathleen Mayell, Menno

Schukking, Jim Voll, Rattana Sengsoulichanh, Alyssa Brandt

Section 2: Data

LIST THE SPECIFIC GEOGRAPHIES THAT WILL BE IMPACTED AND THE RACIAL DEMOGRAPHICS OF CONSTITUENTS IN THOSE AREAS:

The proposed alignment (Build Alternative) being studied is from Target Field Station to 7th St - 10th Ave N, Washington Ave, 21st Ave N between Lyndale and Knox Avenues, and West Broadway between James and Lowry Ave.

Immediate benefits and impacts would be concentrated in the North Loop, Near North, Hawthorne, Willard-Hay and Jordan neighborhoods during planning and design, construction, and post-construction phases.

The project boundary is within the geographic neighborhoods of North Loop, Near North, Hawthorne, Willard-Hay and Jordan.

According to the 2018-2022 ACS 5 Year Estimates, the racial demographics of the populations within these neighborhoods are:

- North Loop: 9.7 percent Black, 8.4 percent Asian, 3 percent Two or more races, 8 percent Hispanic or Latino, and 70.1 percent white;
- Near North: 62.9 percent Black, 6.8 percent Asian, 5.1 percent Two or more races, 4.0 percent Hispanic or Latino, and 20.2 percent white;
- Hawthorne: 48.4 percent Black, 10.8 percent Asian, 5.6 percent Two or more races, 11.3 percent Hispanic or Latino, and 18.3 percent white;
- Willard-Hay: 40.2 percent Black, 7 percent Asian, 6.4 percent Two or more races, 14.5 percent Hispanic or Latino, and 29.2 percent white.
- Jordan: 45.6 percent Black, 12.3 percent Asian, 6.8 percent Two or more races, 14.2 percent Hispanic or Latino, and 19.6 percent white.

Additionally, benefits and impacts are anticipated to be citywide but the focus of this analysis is on the community's most affected by the project, as listed above. Inclusive of the project area in the city, the race and ethnic breakdown of Minneapolis residents is: 18.4 percent Black or African American, 0.9 percent are American Indian, 5.2 percent are Asian, 5.0 percent Two or more races, 9.9 percent are Hispanic or Latino, and 60 percent are white.

Additionally, benefits and impacts are anticipated to be citywide but the focus of this analysis is on the community's most affected by the project, as listed above. Outside of the project area, the race and ethnic breakdown of Minneapolis residents is: 18.9 percent Black or African American, 1.1 percent are American Indian, 5.9 percent are Asian, 9.6 percent are Hispanic or Latino, and 63.6 percent are white.

What does available data tell you about how constituents from BIPOC communities currently relate to the desired outcome as compared to white constituents?

The availability of safe, affordable, fast and reliable transportation options have a large influence on access to housing options, community health, economic opportunities and the built and natural environment.

One of the largest impacts of transportation on the environment is greenhouse gas emissions (GHG), which contribute to climate change and results in extreme weather events, as well as localized health impacts. In 2021, on-road transportation accounted for 22 percent of the City's greenhouse gas emissions. These emissions along with other air pollutants has a cumulative effect on human health that can result in serious health problems such as heart attacks, asthma, high blood pressure, lung conditions, and low birth weights. The Blue Line Extension is expected to increase transit ridership and reduce GHG emissions in the communities adjacent to the project. BIPOC households are more likely to lack access to a car in Minneapolis, due in part to differences in income and access to affordable housing options, when compared to white households. According to IPUMS USA, there are over 28,700 households in Minneapolis without a vehicle in 2020. The racial/ethnicity breakdown of this group is 31 percent Black, 8 percent Latino, 5 percent mixed/other, 7 percent Asian or Pacific Islander, and 47 percent white. The Blue Line Extension will improve transit speed and reliability, offering significant benefits for households without access to a vehicle.

Traffic safety is another key determinant of community health and economic opportunities. The project provides opportunities to redesign streets throughout the project area improve or add pedestrian and bicycle facilities, slow vehicle speeds, and provide safety improvements such as 4-to-3 or 4-to-2 roadway conversions to improve safety for all corridor users. In Minneapolis, almost half of the High Injury Streets are located within communities with large concentrations of poverty and a high percentage of

residents of color (Racial Equity Framework for Transportation). Across the city, severe crashes occur on relatively few streets, identified as High Injury Streets (Minneapolis Vision Zero Action Plan). These streets include 9% of all streets in Minneapolis but are where 66% of severe and fatal crashes happened from 2017-2021. While only 28% of Minneapolis residents live in TEP census tracts, 43% of severe and fatal crashes occurred in these neighborhoods. With this project, the following High Injury Streets would receive major investment, that would be designed with safety for our most vulnerable users as a top priority:

- West Broadway from western city limit to Lyndale Avenue North
- Washington Avenue North from West Broadway to 10th Avenue North
- 7th Street North from Oak Lake Lane to 6th Avenue North

BIPOC residents are also more likely to be killed in or impacted by vehicle crashes, especially Native American and Black residents. Native residents are 1% of the Minneapolis population but were 4% of people killed in vehicle crashes and 5% of people killed in pedestrian and bicycle crashes between 2011 and 2019. Black residents are 19% of the Minneapolis population but were 26% of people killed in vehicle crashes over the same time period.

What data is unavailable or missing? How can you obtain additional data?

In Minneapolis there are 34 building acquisitions proposed, resulting in 27 relocations, identified as part of required acquisitions needed for the Project. Additional work is needed as part of mitigation commitments to support impacts from these takings, as well as construction-related and long-term impacts from the Project via the Supplemental Final Environmental Impact Statement (SFEIS) and Hennepin County-led work group on the development and implementation of corridor-wide anti-displacement strategies.

While the Project Office is required to adhere to federal law regarding the displacement and relocation process for impacted residents and businesses related to Project-related impacts, additional anti-displacement commitments that are needed include these desired outcomes from the May 2023 Anti-Displacement Work Group Recommendations Report:

- Direct housing cost assistance for low-income renters and homeowners
- Increased resources for down payment assistance, shared equity models, and ownership opportunities
- Incentives and other mechanisms for the creation of affordable ownership units
- Basic operating subsidies to small businesses
- Dedicated pool of attorneys to advise and represent business owners about their leases or other real estate option needs.
- Dedicated service providers for direct marketing support
- Real-time advance notice of construction plans for residents and businesses (street & sidewalk closures, utility shut offs, etc.)
- Plan and resources to incorporate arts and culture in and around station areas that is representative of cultural importance in the area.

The anticipated traffic safety improvements from project-related street improvements and the anticipated reduction in greenhouse gases and the related benefits from reducing vehicle trips as part of improving transit services will most benefit those communities directly adjacent and nearby the proposed route. Safety and emissions reduction data for the project area would be needed to evaluate benefits and impacts.

Section 3: Community Engagement

Using the International Association of Public Participation (IAP2) Public Participation Spectrum, which participation strategy(s) was used when engaging those who would be most impacted?

Inform	Yes
Consult	Yes
Involve	No
Collaborate	Yes
Empower	No

Describe the Engagement and what have you learned?

After years of engagement on the previous alignment for the Blue Line Extension, along Olson Memorial Highway, a renewed public engagement effort began in North Minneapolis in August of 2020 to begin the process to identify a community-support route for the METRO Blue Line Extension that would route through North Minneapolis and not use the BNSF corridor. Engagement efforts have included multiple phases that have provided the community with increasing levels of information, culminating in the release of the Initial Route Modification Report in early 2021 and the Final Route Modification Report in 2022.

Since August of 2020, Hennepin County and the Metropolitan Council have held over 800 events that engaged over 80,000 community members. Many of these activities have been focused on Minneapolis throughout the development of the Route Modification Report and further refinement of route options in Minneapolis. The project has focused on reaching low-income communities and communities of color. Throughout the phases of engagement, a range of three to 15 cohort members participated depending on the level of engagement required, with 12 community and cultural organizations to form the Community Engagement Cohort. The Community Engagement Cohort included representatives from major stakeholder groups:

- A Mothers Love,
- Asian Media Access Inc,
- Blue Line Coalition,
- CAPI USA,
- Center for Leadership & Neighborhood Engagement,
- Encouraging Leaders,
- Harrison Neighborhood Association,
- Hawthorne Neighborhood Council,
- Heritage Park Neighborhood Association,
- Jordan Area Community Council,
- Juxtaposition Arts,
- Lao Assistance Center of MN,
- Liberian Business Association,
- Northside Economic Opportunity Network,
- Northside Residents Redevelopment Council,
- Pueblos de Lucha Y Esperanza, and the
- West Broadway Business Coalition

Through the cohort's effort and that of project staff, a variety of efforts were used to connect with the community including pop-up events, informational tables at community activities, drop-in office hours, flyer/drop-knocking, one-to-ones, postcards sent to every resident and business in the project area, variable message signs, social media, and engagement with BIPOC media sources.

Major themes heard from the community were to avoid impacts/disruption to communities and the environment, improve safety on transit and in communities served, improve access/serve transit dependent populations, provide easy pedestrian access to/from stations, increase access to regional destinations, support businesses during construction, prioritize anti-displacement efforts, support economic development, and improve the transit experience.

Section 4: Analysis**How does the outcome for this ordinance, amendment, or policy help the city achieve Racial Equity?**

The SDEIS identifies anticipated impacts of the project on adjacent communities, including transportation, noise and vibration, property and business, and indirect impacts of the project. A commitment to mitigate these impacts and actions for how to mitigate the impacts will be included in the Supplemental Final Environmental Impact Statement (SFEIS) and is expected in Spring 2025. The identified impacts to the community must be mitigated or avoided to support and achieve racial equity.

The West Broadway route aligns with Minneapolis 2040, Climate Equity Action and Transportation Action Plan policies and supports goals and actions identified in the Racial Equity Framework for Transportation and the Vision Zero Action Plan; strengthens historical development patterns and Minneapolis 2040 land use designations; has greater development potential; offers a high level of access to residents and businesses; has historically been considered for fixed rail development (including streetcar) and connects with more community services destinations. The project is anticipated to support city mode shift goals, reducing dependency on vehicles and offering transportation options for residents in an area of the city with some of the highest percentage of residents of color and of household vehicle availability. This area is identified as the highest priority tier in the city's Racial Equity Framework for Transportation.

Section 5: Evaluation

How will impacts be measured? What are the success indicators and process benchmarks?

The SDEIS describes how the environmental impacts are measured. The FDEIS will describe how the impacts identified in the SDEIS are being mitigated.

To be successful, these mitigations must include:

- Preventing displacement and supporting strategies that promote equitable transit-oriented development along the corridor for residents and businesses;
- Mitigating construction impacts of the project;
- Supporting small businesses and residents to maintain access to customers and services, including a corridor-wide parking strategy that supports businesses through the construction phase and into transit oriented development;
- Identifying pedestrian, bicycle, and other connections, to the stations along and across the corridor; improving underlying and connecting street design along the route alignment;
- An additional station at West Broadway and Washington Ave;
- Pursuing strategies to increase watershed size and resident access to stations in North Minneapolis through removing barriers and increasing safe walking, rolling and biking routes to the stations;
- Streetscape, urban design, art, and greening in the corridor prioritizing routes to and from stations;
- Continued participation in transit and planning efforts along Olson Memorial Highway to deliver high quality transit in the corridor and improve the safety and accessibility of the corridor for all users consistent with needs already identified; and
- Advance arterial Bus Rapid Transit on Lowry Avenue, to further connect north Minneapolis to the regional transit system.

Project Benchmarks

After this current phase of identifying environmental impacts, next steps include identifying mitigation actions, Municipal Consent, design and engineering, station area planning, and construction. Additional opportunities for REIAs may be appropriate at some of these benchmarks and others as may be identified.

How will those who are impacted be informed of progress over time?

This is one milestone of a multi-year and multi-phased project. Opportunities for engagement and feedback from those who are impacted began in 2020 and will be ongoing. Municipal consent and station area planning will involve community outreach and consultation, which is slated to occur later in 2024. Engagement opportunities are always listed on the BRLT project website and yourblueline.org.

From: "Collins, Melissa \ (DNR)" <Melissa.Collins@state.mn.us>

To: "Damle, Neha" <neha.damle@metrotransit.org>
BlueLineExt <BlueLineExt@metrotransit.org>

Date: 7/31/2024 8:29:41 PM

Subject: [EXTERNAL] METRO Blue Line Light Rail Transit Extension Draft SEIS - DNR Comments

Attachments: 2023-00042NHletter.pdf

You don't often get email from melissa.collins@state.mn.us. [Learn why this is important](#)

Dear Neha Damle,

Thank you for the opportunity to review the METRO Blue Line Light Rail Transit Extension Draft Supplemental Environmental Impact Statement (SEIS). The Minnesota Department of Natural Resources (DNR) has reviewed the document and respectfully offers the following comments for your consideration:

Section 5.8.2.1 Endangered and Threatened Species; Section 5.8.4.2, Blanding's Turtle; Appendix A-5:

Please note that when using a Natural Heritage Information System (NHIS) license agreement to screen for rare features, if a state-listed species is identified within one-mile of the project boundary, the project should be submitted to [Minnesota Conservation Explorer](#) for further coordination with DNR and to obtain next steps. Only DNR can determine if a state-listed species is likely to be impacted by a project. A Natural Heritage Review is only considered current for 12 months because we are constantly updating the NHIS with new data.

The northern terminus in Oak Grove (T119N, R21W, Sections 7 and 8) has some potential habitat that may support two state-listed species of special concern, the lark sparrow (*Chondestes grammacus*) and rattlebox (*Crotalaria sagittalis*). There are records of each of these species in Oak Grove Park (a Three Rivers District park) north of 101st Ave, and the land cover of the project area appears to contain similar habitat. Please clarify whether actions will be taken to avoid or minimize impacts to these species.

Pugnose shiner (*Notropis anogenus*) and least darter (*Etheostoma microperca*) may be present in Shingle Creek. The SEIS states that no habitat for least darters exists in the project area. Does this mean that Shingle Creek was examined at the crossing point and was determined to not have habitat for these species?

Please note that the discussion regarding the state-threatened, Blanding's turtle (*Emydoidea blandingii*), is not fully consistent with the required avoidance measures and recommendations provided in the May 10, 2023 Natural Heritage letter (attached). We recommend that project plans and documents utilize the NH letter for specific requirements and BMPs to avoid impacts to Blanding's turtles, and that a new NH Review is obtained prior to the start of construction.

Thank you again for the opportunity to review this document. Please let me know if you have any questions. A confirmation of receipt would be most appreciated.

Sincerely,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her/hers

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov

 **DEPARTMENT OF
NATURAL RESOURCES**





City of Robbinsdale, MN
4100 Lakeview Avenue North
Robbinsdale, Minnesota 55422-1898
Phone: (763) 537-4534
Fax: (763) 537-7344

Specific to the Route – South to North

1. Lowry Ave Station – City of Robbinsdale is requesting:
 - a. Project Office formally document feedback from North Memorial Hospital
 - b. Project Office commit to a safety plan – as the station would be operated by the Metropolitan Council (Metro Transit), it rests on a Hennepin Council Facility (CR 81), as planned it sits in the City of Robbinsdale AND City of Minneapolis within Minneapolis Parks Board property.
 - c. Project Office commit to a controlled/secure platform
 - d. Project Office should consider bus hub provisions at this location
2. In tandem with the project, add curb and gutter on York Ave between Lowry and Parkview.
3. Current plans indicate a two-way frontage road access near North Memorial. While the City sees value in this consideration, the City requires that project office receive formal feedback from North Memorial.
 - a. If reconstruction includes work on the retaining wall between York and Abbott with precast concrete walls, City logo should be imprinted and colored.
4. The City would like to consider the reduction in France Ave behind Citizen's Bank during project construction.
5. The City would support the removal of the existing pergola at the NW corner of 36th & CR 81 – this could be relocated to a different area.
6. The City continues to support the left turn lane into Lake View Terrace Park boat launch (southbound on CR 81). Staff have seen multiple iterations.
7. The City may consider the elimination of impervious surface at the “turnaround” north of the access to LVT (near 37th Ave N).
8. The City does not support the loss of Ash trees by Hidden Shores on Lakeland Ave.
9. There needs to be a right turn lane for the semis exiting southbound CR 81 for the Lakeland Ave. N. frontage road. Semis depend on this section of frontage road in addition to moving vans for Birdtown Flats, etc...
 - a. The City would request that a sidewalk be installed on 39th Ave between CR 81 and West Broadway.
10. The City supports the placement of the “Downtown Station”, south of 40th Ave N.

11. The City does not support negative impacts at the Southeast corner of 40th Ave. N. and CR 81 (particularly 4227 40th Ave. N). This house will suffer from the adjacent traffic impacts.
12. Size and placement of parking facility – Most recent iterations have included a three hundred (300) stall ramp, which exceeds the number of spaces desired by the City Council. Additionally, the most recent version that staff has seen includes bus access on West Broadway and/or 40th Ave N. The City does not support additional traffic on side streets (including West Broadway, 40th Ave N, and Hubbard Ave). The City would like to see primary access come from CR 81. Further, the most recent iteration includes a location north and west of the intersection of 40th Ave and CR 81 – if this site is not chosen, the City must be presented with alternatives.
13. Elim church site should be considered an alternate for the Bus center-Parking ramp site. If US Bank is pre-emptively redeveloped, alternate plans should be developed. The funeral home site would provide a reasonable Plan C.
14. The City is requesting concrete streets be installed around the bus hub.
15. The City is requesting that there are not stops within 600 feet of the bus hub.
16. Turning movements on 42nd, near McDonald's access, needs further study. Current plans suggest potentially limiting egress/ingress to right turns only – the City is concerned this will limit access to McDonald's and other businesses, as well as City parking. Further, without proper engineering and design, people will continue to turn left (westbound on 42nd Ave N, OR exiting the parking lot on to 42nd Ave N).
17. The City does not support the loss of approximately 30% of parking for Robin Center, CVS, and any impacts of the retaining wall at Town Center.
18. In order to support at-grade structure, between 40th Ave N and (at least) 42nd Ave N, the City is requiring engineering and design elements be explicitly produced and shared with City officials. In December, Dan Soler and Christie Beckwith sat with the City Manager to discuss what the project office could share to ease concerns the Council has raised. At the January 9, 2024 City Council meeting, no plans were shared/discussed by the project office.
19. The City supports maintaining the left turn lane (southbound CR 81) to Twin Lakes/Three Rivers boat launch.
20. The City does not support 90-degree parking at Robin Center. This would require a variance and would not normally be permitted. ***City Code Section 510.17 Subd. 3(b):*** *Ninety degrees (90°) head in parking, directly off of and adjacent to a public street or alley, with each stall having its own direct access to the public street or alley, shall be prohibited. However, the city council may approve sixty degree (60°) head in angle parking, directly off and adjacent to a public street or alley, with each stall having its*



City of Robbinsdale, MN
4100 Lakeview Avenue North
Robbinsdale, Minnesota 55422-1898
Phone: (763) 537-4534
Fax: (763) 537-7344

own direct access to a public street or alley, as a conditional use as regulated by subsection [535.01](#).

21. The Lakeland Ave. N. frontage road should not be disconnected between CVS and the gas station.
22. The City does not support the loss of the right turn lane from north bound CR 81 to 47th Ave. N. This will create conflicts with traffic turning into the neighborhood on the east side. This access point is almost exclusive and turning vehicles will conflict with accelerating northbound traffic. Further, any alterations to that intersection must consider neighbor traffic. The City requests a turn lane is shown.
23. The City requests that the new wall along the path near the water tower would be concrete panels and include a stamp of the Robbinsdale logo in blue (eg: Maple Grove along 94)
24. The City is requesting that area marked “Curb, Median, & Truck Apron” as indicated by red, be plantings.
25. The City is requesting that where beneficial (City’s discretion), re-platting take place
26. The City is requesting all overhead line that cross/run parallel to construction be undergrounded.

General Considerations, Observations

1. The City continues to patiently wait for the following data:
 - a. Ridership breakdown by stops. The project office received numbers in 2023, and has since shared projections for the entire LRT extension, but refuses to share individual stop projections. Since this includes justification for a parking structure, the City is requesting this data immediately.
 - b. Trip Time data.
2. The City has requested a response to the following:
 - a. In the event of a derailment at 40th Ave. N., 41st Ave. N., or 42nd Ave. N. what provisions will be available for emergency services to cross CR 81?
 - b. How will public safety officials acquire training related to LRT operations?
 - c. What apparatus will the project provide/provide reimbursement for? Does this include the creation/addition of a Public Safety substation?
3. The City is requesting that Hennepin County and the Metropolitan Council explicitly state where they support Anti Displacement policy (including what they will enact). Further, the City is requesting that both entities explicitly declare what amount of

resources (including personnel and dollars) will be dedicated to Anti Displacement efforts.

4. The City requests that Metro Transit continue to address public safety concerns at stations and on Light Rail.
5. The City does not support the reduction of speed on CR 81 if it shifts vehicle traffic on to side streets/residential neighborhoods. The City formally requests a traffic study indicating what a reduction in corridor speed, if proposed, does to local traffic.
6. The City is requiring a formal plan and commitment from Hennepin County and Metro Transit regarding snow plowing, snow storage, and snow removal on the rail corridor, roads, any parking structure, and walkways/paths.
7. The City supports updates to the intersection of 42nd Ave N and West Broadway.
8. The City is requesting the project office consider stormwater management infrastructure needs, including correlated costs, in tandem with construction.
9. The City is requesting the project office commit to a “no net loss” of vegetation, including but not limited to, plantings related to water quality treatment AND beautification.
10. The City is requiring formal notification of TPSS location(s)
11. The City is requesting that the project office show the need to continue the Rte 32 (to potentially be a BRT route in the future), north of the Lowry Station (as this seems redundant).
12. The City is requesting all lighting installed use LEDs with Dark Sky Compliance
13. The City is requesting clarification on Platform Security – eg: who provides proactive efforts, and who responds to emergency calls.
14. The City is requesting that the LRT (Met Council and/or Hennepin County) commit to paying utility fees for signals and street lights (including maintenance and replacement).
15. The City is requesting that storm water retention enhancements be a shared expense – prior agreements related to CR 81 would be null/void
16. The City requests access for conduit for Fiber along any construction.
17. The City will compile specific requests for areas outside the immediate corridor – those include, but are not limited to:
 - a. reconstruct the bridge on 36th near June and Halifax.



City of Robbinsdale, MN
4100 Lakeview Avenue North
Robbinsdale, Minnesota 55422-1898
Phone: (763) 537-4534
Fax: (763) 537-7344

- b. reconstruct the pedestrian facilities downtown, including ADA compliance and consider utilities in tandem.
 - c. Parks investments, including sidewalks and trails system
 - d. Consider engineering that promotes safety at 42nd Ave N and West Broadway
 - e. CR 9 from CR 81 to TH 100
18. Request that Met Council pay taxes on land used for Parking Ramp
19. Met Council/Hennepin County responsible for all maintenance of landscaping, fencing, retaining walls, crosswalks, and signage along the corridor
20. Reimburse the City for all ROW that was purchased as a part of CR 81 reconstruction in 2005-2008
21. Follow direction from the City relating to streetscaping. Now would be the time to create a plan for execution...
22. Council needs to determine whether or not a set of demands related to municipal consent are agreeable. "Municipal consent by the City of Robbinsdale is dependent on..."

From: Bubke, Jennifer (She/Her/Hers) (DNR) <Jennifer.Bubke@state.mn.us>
Sent: Monday, March 24, 2025 11:46 AM
To: Young, Kelcie <Kelcie.Young@metrotransit.org>
Cc: Judd, Catherine <Catherine.Judd@hdrinc.com>; megan.litsey <Meghan.Litsey@metrotransit.org>; Reed, Scott <scott.reed@hdrinc.com>; Biesmann, Katherine G. <katherine.biesmann@hdrinc.com>
Subject: RE: Blue Line Extension - DNR coordination related to park grant funds

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kelcie,

For Victory Memorial Parkway, if the impacts are outside the boundaries of state funding, this would not trigger a conversion or temporary non-confirming use.

Thanks,

Jenni

Jennifer Bubke (*she/her/hers*)

Grants Specialist Coordinator | Division of Parks and Trails

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155

Phone: 651-259-5638

Email: Jennifer.Bubke@state.mn.us

mndnr.gov





From: Young, Kelcie <Kelcie.Young@metrotransit.org>
Sent: Wednesday, March 12, 2025 12:53 PM
To: Bubke, Jennifer (She/Her/Hers) (DNR) <Jennifer.Bubke@state.mn.us>
Cc: Judd, Catherine <Catherine.Judd@hdrinc.com>; Litsey, Meghan <Meghan.Litsey@metrotransit.org>; Reed, Scott <scott.reed@hdrinc.com>; Biesmann, Katherine G. <katherine.biesmann@hdrinc.com>
Subject: RE: Blue Line Extension - DNR coordination related to park grant funds

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Hi Jennifer,

Thank you for providing this information!

We will prepare the written request for the temporary non-confirming use for Becker Park.

Regarding the Victory Memorial Parkway information – the light rail project would have minor impacts to Victory Memorial Parkway, but not the portion with state funding which is approximately 1.5 miles from the project location. Would that still trigger a conversion (or potentially a temporary non-confirming use)? If it would be helpful to pull together a virtual meeting to discuss we can coordinate that – just let us know some available times.

Thank you!

Kelcie Young, AICP

Pronouns: she/her/hers

Environmental Manager

Metro Transit

From: Bubke, Jennifer (She/Her/Hers) (DNR) <Jennifer.Bubke@state.mn.us>
Sent: Wednesday, February 5, 2025 4:40 PM
To: Young, Kelcie <Kelcie.Young@metrotransit.org>
Cc: Judd, Catherine <Catherine.Judd@hdrinc.com>; Litsey, Meghan

<Meghan.Litsey@metrotransit.org>; Reed, Scott <scott.reed@hdrinc.com>; Biesmann, Katherine G. <katherine.biesmann@hdrinc.com>

Subject: [EXTERNAL] RE: Blue Line Extension - DNR coordination related to park grant funds

Hello Kelcie,

I cover Hennepin County so I can serve as the focal point for this project moving forward.

- **Becker Park:** If the corner of the park will be restored back to park land and the disruption is 6 months or less, than a temporary non-confirming use request would be correct.
- **Victory Memorial Parkway, Minneapolis:** It looks like this had state funding, but no LWCF funding. This would still trigger a conversion if needed, it just would not have to go through NPS. Attached is the map file I have for this grant.

Let me know if there are any immediate questions as you go through the above.

Best,

Jenni

Jennifer Bubke (*she/her/hers*)

Grants Specialist Coordinator | Division of Parks and Trails

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155

Phone: 651-259-5638

Email: Jennifer.Bubke@state.mn.us

mndnr.gov





From: Young, Kelcie <Kelcie.Young@metrotransit.org>
Sent: Wednesday, January 29, 2025 2:23 PM
To: Bubke, Jennifer (She/Her/Hers) (DNR) <Jennifer.Bubke@state.mn.us>; Wennerberg, Sarah (DNR) <Sarah.Wennerberg@state.mn.us>
Cc: Judd, Catherine <Catherine.Judd@hdrinc.com>; Litsey, Meghan <Meghan.Litsey@metrotransit.org>; Reed, Scott <scott.reed@hdrinc.com>; Biesmann, Katherine G. <katherine.biesmann@hdrinc.com>
Subject: Blue Line Extension - DNR coordination related to park grant funds

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Hi Sarah and Jennifer-

Metro Transit, together with our Federal partner the FTA, is conducting a Supplemental Environmental Impact Statement for the Blue Line Extension Project. More information about the Project can be found here – a Supplemental Draft EIS was published last June and we are currently developing a Supplemental Final EIS which includes Section 4(f) and 6(f) analysis. We are reaching out to confirm grant funding requirements and coordinate next steps regarding two parks.

Becker Park in Crystal:

Since Becker Park received LWCF grant assistance, we are anticipating we have an anticipated non-conforming use for temporary construction impacts to a small corner of the park property to facilitate intersection improvements the City of Crystal (also the park owner) requested. We can prepare a written request with additional information if this is correct. We're happy to discuss this topic with you in more detail.

Victory Memorial Parkway, Minneapolis:

It appears Minneapolis Park and Recreation Board received Outdoor Recreation Grant Program funds; could you provide more information about what boundaries/portion of the park these funds apply to, and to clarify what DNR coordination would be needed. We have been coordinating with MPRB related to the project which includes a station at Lowry Avenue, within an existing transportation easement, though understand the DNR is the official with jurisdiction for these funds. We can discuss this topic further as well, based on the applicability of the DNR funding.

Could you confirm if you both wish to be involved in this coordination, and if it works best to meet to discuss, let us know your availability to meet either virtually or in person, at your preference.

Thank you!

Kelcie Young, AICP

Pronouns: she/her/hers

Environmental Manager

Metro Transit