

Southwest Transitway DEIS Comments

Comments Received from Agencies and Other Public Entities

Part 1 of 4



"Gordy, Matthew R [L A]"
<mgordy@iastate.edu>
10/16/2012 01:47 PM

To "swcorridor@co.hennepin.mn.us"
<swcorridor@co.hennepin.mn.us>
cc
bcc

Subject SW Corridor Rail Feasibility Study, 2003

Hello,

I am unable to access the chapters from the 2003 Rail Feasibility Study from the SWLRT website on this page <http://www.southwesttransitway.org/project-progress-past-a-future.html>

The links are either inactive (Chapter 1) or link to a username and password for an FTP site (the other chapters.) Are these documents still available for viewing, and can you help me to access?

Best regards,
Matthew

Matthew Gordy
Assistant Professor, Department of Landscape Architecture
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Randy Newton
<RNewton@edenprairie.org>
12/05/2012 03:50 PM

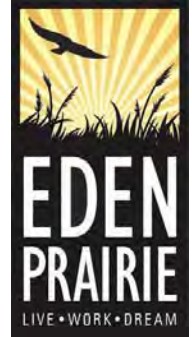
To "swcorridor@co.hennepin.mn.us"
<swcorridor@co.hennepin.mn.us>
cc "Katie.Walker@co.hennepin.mn.us"
<Katie.Walker@co.hennepin.mn.us>
bcc

Subject: City of Eden Prairie Southwest LRT DEIS Comments

Attached for reference is the City of Eden Prairie's Southwest LRT DEIS comments.
A hard copy of this letter has been mailed to:

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Randy Newton, PE, PTOE
Assistant City Engineer | Traffic Engineer
City of Eden Prairie
8080 Mitchell Road
Eden Prairie, MN 55344
952 949-8339
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8080 Mitchell Rd
Eden Prairie, MN
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edenprairie.org

December 4, 2012

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

SUBJECT: Southwest LRT DEIS Comments

To Whom It May Concern:

The City of Eden Prairie has reviewed the Southwest Transitway Draft Environmental Impact Statement (DEIS). We appreciate the opportunity to review the DEIS and respectfully submit the following comments, which were approved at the November 15, 2012, City Council meeting (resolution attached), for consideration:

General Comments

- 1) The City of Eden Prairie continues to support Alternative 3A as the preferred alternative as it serves the Major Center Area and Golden Triangle Area and provides the best opportunities for development, redevelopment, and economic development. Alternative 3A clearly has the highest ridership potential and the greatest positive economic impact to Eden Prairie and the region primarily due to its close proximity to existing and future job concentrations. However this alternative could be further improved in these respects by moving the Town Center Station closer to the Town Center or the Eden Prairie Center.
- 2) In order to better serve the Eden Prairie Town Center and Eden Prairie Center the feasibility of a more centrally located and walkable Town Center Station needs to be evaluated during the Preliminary Engineering process. Attached for reference are several concept location areas for the proposed Town Center Station that should be considered.
- 3) Consistent with the statements included in the Operations and Maintenance Facility Site Evaluation memorandum (Appendix H of the DEIS), a more thorough and full evaluation of the Southwest LRT line and all potential Operations and Maintenance Facilities (OMF) must occur before the OMF is sited. The evaluation must include all potential sites along the line and not just the sites included in the DEIS OMF documentation. The siting of the OMF must take into account and minimize impacts to local businesses, tax capacity, station area transit oriented development, and adjacent land uses. Furthermore construction and operation of the OMF must meet all applicable zoning codes, building codes and other city requirements for the City in which it is placed.

- 4) The selection of the location, size and type (at-grade, structured, mix-used, etc.) of the park and ride facilities is a critical issue which must be closely coordinated with the City of Eden Prairie. The City believes there is significant opportunity to improve on the siting and size of the Park and Ride locations shown in the conceptual engineering drawings. In particular the City has the following park and ride related comments:
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 - The City would also prefer to minimize the size of the park and ride at the Golden Triangle Station as these additional trips could be better allocated to future development.
 - The use of the existing Southwest Station Park and Ride must be coordinated with Southwest Transit. This is a large existing park and ride facility and any potential changes in service could affect the available parking supply.
 - In order to accommodate and allow for station area development all larger park and ride facilities should be built as structured parking. Also, joint development opportunities should be explored at these locations.
 - In all cases the size of the facility must be balanced with parking demand to assure adequate parking supply for Park and Ride users and to avoid potential parking overflow issues that would impact adjacent businesses or residential neighborhoods.
- 5) The design of the Southwest LRT must complement and be coordinated with the services offered by Southwest Transit. Future Southwest Transit operations are critical to the design and operation of the Southwest LRT line. Southwest Transit needs to be an active partner in the Preliminary Engineering process.
- 6) The LRT crossing of Valley View Road at Flying Cloud Drive should be converted to a grade separated crossing. The Valley View Road corridor is a major artery serving Eden Prairie's Golden Triangle and Major Center areas which provides critical access to both I-494 and Highway 212. The operation of this corridor is extremely dependant on and sensitive to effective traffic signal coordination. The traffic analysis included in DEIS indicated failing operations along this corridor making it an inappropriate location for an at-grade LRT crossing.
- 7) Similarly the City of Eden Prairie has significant concerns about the impacts of an at-grade crossing of Mitchell Road. Mitchell Road is a major north-south artery through Eden Prairie providing access to both Highway 5 and Highway 212. Effective signal coordination is critical to the operation of this corridor. The impacts of this proposed at-grade crossing must be fully evaluated based on actual proposed LRT operating characteristics to determine the true impacts of an at-grade crossing in this location. In addition proposed development in the area including the impacts of the Mitchell Road station and park and ride must be accounted for.

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Detail Comments

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- 9) Section 4.10 (Electromagnetic Interference and Utilities) - Short and long term impacts to public utilities must be minimized and mitigated by the project. These utilities provide critical public service which must be maintained at all times.
- 10) Section 4 (General) – The proposed Alternative 3A alignment passes immediately adjacent to the Eden Prairie Water Plant. The potential effects of vibration and stray current on the facility including the underground storage tanks, collector lines and distribution lines will need to be evaluated and if necessary mitigated. In addition the drive aisle around the outside of the facility is critical to the efficient use of the facility and must be maintained.
- 11) Section 6.2.2.3 (Traffic Signal Priority and Preemption) – The information in this section indicates that both traffic signal priority and preemption will be used at LRT at-grade crossings. The impacts of these proposed operations must be fully evaluated based on actual proposed LRT operating characteristics to determine the impacts and appropriate mitigation of the proposed at-grade crossings.
- 12) Section 6.2.2.3 (Intersection LOS Analysis) – This section indicates that the key periods of operational analysis are the AM and PM peak hours. In some locations the noon time rush may be as significant and should be evaluated as well. This is the case in the Eden Prairie Major Center Area (general area bounded by the Prairie Center Drive / Valley View Road ring road).
- 13) Section 6.2.2.3 (Intersection LOS Analysis) – The Traffic Study included in the appendix indicated that the same growth rate was used for traffic projections throughout the corridor. The proposed LRT project spans a large geographical area with a range of development patterns. Given these differences separate growth rates should be developed for each roadway corridor.
- 14) Section 6.2.2.3 (Intersection LOS Analysis) – The operational analysis in this section indicates failing operations in the Highway 212 / Valley View Road interchange area. The operation of this corridor is extremely dependant on and sensitive to effective traffic signal coordination and any implementation of traffic signal priority or preemption is expected to significantly impact its operation. These factors make the Valley View Road crossing an inappropriate location for an at-grade LRT crossing.
- 15) Section 6.2.2.3 (Intersection LOS Analysis) – The proposed grade crossing of Mitchell Road must be fully evaluated to determine its true impacts. The methodology used in the DEIS traffic analysis assumed standard priority/preemption impacts to the Mitchell Road traffic signals which may or may not be consistent with what will be required by LRT operations. In addition the analysis must take into account the proposed development in the area including the Mitchell Road station and park and ride, impacts to effective signal coordination which is critical to the operation of the corridor, and impacts to emergency vehicle pre-emption and operation due to its frequent use and the close proximity of both the police and fire stations.

- 16) Section 6.2.2.3 (Intersection LOS Analysis) – Eagle Ridge Academy school is located at 7255 Flying Cloud Drive immediately adjacent to the proposed LRT crossing of Flying Cloud Drive. The traffic characteristics of this site including the morning and afternoon vehicle queuing need to be accounted for in evaluating and designing the proposed at-grade crossing.
- 17) Section 6.2.2.4 (Transit Station Access) – The DEIS includes no analysis of the traffic impacts of the proposed stations and park and ride facilities. These facilities must be evaluated to determine the impacts and the appropriate mitigations.
- 18) Section 6.2.2.4 (Transit Station Access) – The existing Southwest Station commercial site and park and ride currently experiences on-site congestion at peak times that occasionally impacts Technology Drive. Any proposed expansion to this site needs to evaluate both the public street and on-site impacts.
- 19) Section 6.2.2.5 (Operations and Maintenance Facility) – The section on OMF 3 fails to indicate the long term effects this proposed location will have on development and redevelopment in the Mitchell Road station area. These impacts are in direct conflict with Goal 5 of the project “Support Economic Development”. The section also fails to indicate the likely long term wetlands impacts and the expected heavy use of Wallace Road during construction.
- 20) Section 6.2.2.5 (Operations and Maintenance Facility) – The DEIS includes no analysis of the traffic impacts of the proposed Operations and Maintenance facility. This facility must be evaluated to determine its traffic impacts and any appropriate mitigations.
- 21) Section 6.2.2.6 (Building Facility Access) – This section does not indicate that the bus access ramps to / from Highway 212 and Southwest Station are anticipated to be impacted.
- 22) Section 6.2.3 (Short-Term Construction Effects) – Temporary construction impacts must be evaluated and to the extent possible minimized and mitigated. This includes providing viable access to all properties at all times. In particular construction options and techniques for the proposed tunnels and grade crossings must be fully evaluated and coordinated with the City. Also viable access will need to be provided to all properties at all times.
- 23) Section 6.3.1.4 (Bicycle and Pedestrian Facilities) – Short and long term impacts to the Minnesota River Bluffs LRT Regional Trail must be minimized and mitigated in order to maintain the use of the trail both during and after construction of the LRT.
- 24) Section 6 (General) – A north-south trail running adjacent to the proposed LRT line and connecting Valley View Road and Shady Oak Road should be evaluated during project development. The trail would improve trail and sidewalk connectivity and would enhance pedestrian and bike access to the Golden Triangle station.

- 25) Section 6 (General) - As currently shown the Town Center Station may require that a new access point to/from the south be developed. This access point will provide a secondary access to Technology Drive businesses both during and after construction. The access will also provide an important and direct connection to the Town Center.
- 26) Table 9.4 (Reasonably Foreseeable Future Actions) – The City of Eden Prairie is currently proceeding with improvements to Shady Oak Road (County Road 61) between and including the interchange at Highways 62 and 212. The northern phase of the project is currently under construction. Construction of the southern phase is expected to start in 2014 or 2015. The proposed LRT alignment passes through the Shady Oak project just to the east of the Highway 212 interchange. The Southwest LRT project will need to continue to work cooperatively with the City and other project partners to assure that design and construction issues are appropriately coordinated and to keep the Shady Oak Road project on schedule. In addition in order to limit the combined construction impacts of the projects potential options for accelerating portions of the Southwest LRT project should be investigated.
- 27) Table 9.4 (Reasonably Foreseeable Future Actions) – Improvements to Highway 5 and Highway 212 between their merge and I-494 should be included in this table. This segment of roadway is currently congested and potential improvements should be considered. The Southwest LRT project needs to work in coordination with MnDOT to assure that the project does not create a significant impediment to the future improvements along Highway 5 and Highway 212.
- 28) Section 9.6.11.4 (Water Resources Mitigation) - The use of mitigation bank credits for permanent impacts to wetlands is proposed. This would result in impacts to the immediate watershed where the impacts are located as no mitigation bank credits are available here. The document should state that they will evaluate the immediate watershed and determine if there are potential mitigation opportunities that could be developed that would provide mitigation credits and reduce impacts to the local biota.
- 29) Table 12.2-2 (Preliminary List of Required Permits) - Add Nine Mile Creek Watershed District to table for Sediment/Erosion Control Permits and Wetland Conservation Act Permit.
- 30) Appendix F (Conceptual Engineering Drawings) – The existing Lone Oak Center development (southwest quadrant of Highway 212 / Mitchell Road interchange) is not shown on the plans. This development needs to be accounted for in the design and development of the project.
- 31) Appendix F (Conceptual Engineering Drawings) – The existing Gander Mountain development (north side of Technology Drive between Prairie Center Drive and Flying Cloud Drive) is not shown on the plans. This development needs to be accounted for in the design and development of the project.

- 32) Appendix F (Conceptual Engineering Drawings) – The United Health Group development (southeast quadrant of Highway 62 / Shady Oak Road interchange) is not shown on the plans. This development needs to be accounted for in the design and development of the project.
- 33) Appendix H (Soil, Groundwater, and Dewatering Conditions – 8th page) - Not all residents in the area are on municipal water. Properties on Willow Creek Road and Willowwood (area west of Highway 212) are served by wells. There may also be some private irrigation wells.

Sincerely,

A handwritten signature in black ink that reads "Rick Getschow". The signature is written in a cursive style with a long horizontal flourish at the end.

Rick Getschow
City Manager

Attachments

CC: Mayor and City Council

**CITY OF EDEN PRAIRIE
HENNEPIN COUNTY, MINNESOTA**

RESOLUTION NO. 2012-161

**SUBMIT COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
FOR THE SOUTHWEST TRANSITWAY**

WHEREAS, the Southwest Transitway is a proposed 15-mile light-rail line serving Eden Prairie, Minnetonka, Hopkins, St. Louis Park and Minneapolis; and

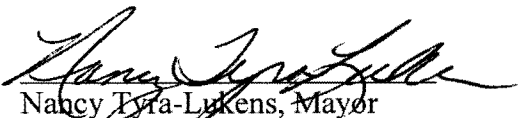
WHEREAS, the Federal and state environmental rules require that an Environmental Impact Statement (EIS) be prepared for the proposed Southwest Transitway project. The EIS process includes the preparation of a Draft Environmental Impact Statement (DEIS), which must be made available for public review and comment; and

WHEREAS, the Southwest Transitway Draft Environmental Impact Statement (DEIS) is available for public comment through December 11, 2012; and

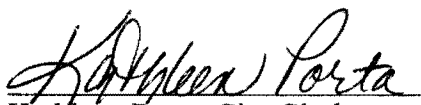
WHEREAS, the City Council appreciates the opportunity to review the DEIS and desires to respectfully submit comments on the DEIS.

NOW, THEREFORE, BE IT RESOLVED that the Eden Prairie City Council authorizes the City Manager to submit comments on the DEIS consistent with the November 15, 2012 draft comment letter during the DEIS public comment period.

ADOPTED by the Eden Prairie City Council on November 20, 2012.


Nancy Tyra-Lukens, Mayor

ATTEST:


Kathleen Porta, City Clerk

Southwest Transitway

Town Center Station Location Considerations

General

- The feasibility of more centrally located and walkable Town Center Station should be evaluated during the Preliminary Engineering Process
- Minimize Town Center Station parking. If possible re-allocate parking to Southwest Station and Mitchell Road.

Location Priorities

- Walkability to Housing and Employment (Ridership Potential)
- Close proximity to Eden Prairie Center. Station within ¼ mile to a mall entrance.
- Maximize potential redevelopment and reinvestment opportunities.
 - Considered recent investments in area
- Separation from Southwest Station LRT Station
- Acceptable traffic impacts of track alignment

Potential MCA Station Locations

Location A – Town Center

- Guide Plan Approved Town Center Location
- Close proximity to existing and future housing and employment densities
- Potential for planned re-development
- Walkable to Eden Prairie Center (across Flying Cloud Dr)
- Anticipated Moderate Track Alignment Impacts

Location B – EPC Northeast




- Close proximity to Eden Prairie Center
- Potential for re-development
- Walkable to existing and future housing and employment uses in Town Center (across Flying Cloud Dr)
- Anticipated Moderate Track Alignment Impacts

Location C – MCA South

- Close proximity to Presbyterian Homes and walkable to residential uses south of MCA (across Prairie Center Dr)
- Walkable to housing and employment uses in Town Center
- Walkable to Eden Prairie Center (across Flying Cloud Dr)
- Potential for re-development
- Anticipated High Track Alignment Impacts






Legend

-  Center of Radius Rings
-  Station Area
-  1/4, 1/2 Mile Radius Ring

STATION AREA A






Legend

-  Center of Radius Rings
-  Station Area
-  1/4, 1/2 Mile Radius Ring

STATION AREA B



Legend

-  Center of Radius Rings
-  Station Area
-  1/4, 1/2 Mile Radius Ring

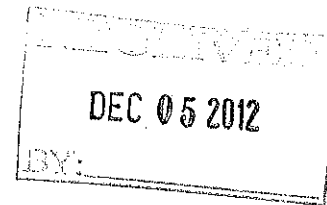
STATION AREA C



City of Granite Falls

641 Prentice Street
 Granite Falls, MN 56241-1598
 Phone (320) 564-3011 FAX (320) 564-3013
 7-1-1 or 1-800-627-3529 Voice, TTY, ASCII
www.granitefalls.com

Office of Mayor



December 3, 2012

Hennepin County Housing, Community Works & Transit
 ATTN: Southwest Transitway
 701 Fourth Avenue South, Suite 400
 Minneapolis, MN 55415

Dear Hennepin County Housing, Community Works & Transit;

The City of Granite Falls is served by the Twin Cities & Western Railroad Company (TC&W) for economical freight rail transportation. Ours and other rural Minnesota regions provide a significant amount of exports for the State of Minnesota and having economical freight rail transportation is critical to allow rural Minnesota to compete in the global marketplace. It is also indispensable to have a freight carrier with local roots to work with on rail related issues.

We understand that the Southwest Transitway Draft Environmental Impact Statement (DEIS) recommends a relocation of the freight rail route to accommodate the Southwest Light Rail Transitway (SWLRT). The movement of freight and people is an important community and economic development issue for our community and the entire state. Based on information provided by TC&W, we understand that the recommended freight rail relocation design as shown in the DEIS released on October 12, 2012 will result in increased costs for TC&W to operate its trains to and from our city. It is vital that the area served by the TC&W retain an economical freight rail transportation option. The proposed design as recommended in the DEIS is not acceptable to maintain our competitive freight rail transportation.

Alternatives to your recommended design would be:

- 1.) Do engineering for the reroute that meets TC&W's engineering standards,
- 2.) Co-locate the SWLRT with the current freight route,
- 3.) Reroute freight back to the 29th St Corridor, where TC&W ran until 1998, or
- 4.) Route the SWLRT up the MN&S rail line

We recommend Hennepin County and the Met Council address TC&W's concerns over the design of the freight rail relocation shown in the DEIS, and work with the TC&W to arrive at a freight rail solution that preserves our region's existing economical freight rail transportation.

Sincerely,

David Smiglewski
 Mayor, City of Granite Falls

After 5 days, return to

CITY of GRANITE FALLS

City Hall

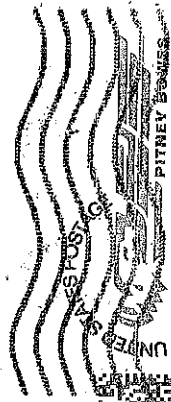
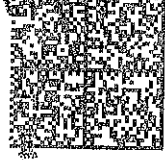
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GRANITE FALLS, MN 56241-1517

AN EQUAL OPPORTUNITY EMPLOYER AND PROVIDER

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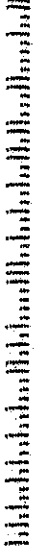
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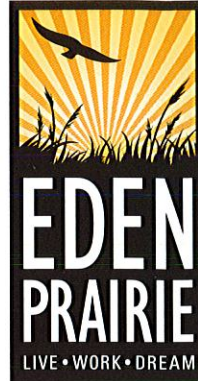
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ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

5541551643





OFC 952 949 8300
FAX 952 949 8390
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8080 Mitchell Rd
Eden Prairie, MN
55344-4485

edenprairie.org

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- 8) Section 4.2.2.2 (Wetlands, Streams and Lakes) - The document could provide more accurate information regarding potential impacts by using the City's wetland mapping. This could then be used to calculate a more accurate representation of wetland impacts for the remaining sections (such as 4.2.3.5). For example, a wetland is located within the vicinity of the proposed OMF 2.

- 9) Section 4.10 (Electromagnetic Interference and Utilities) - Short and long term impacts to public utilities must be minimized and mitigated by the project. These utilities provide critical public service which must be maintained at all times.
- 10) Section 4 (General) – The proposed Alternative 3A alignment passes immediately adjacent to the Eden Prairie Water Plant. The potential effects of vibration and stray current on the facility including the underground storage tanks, collector lines and distribution lines will need to be evaluated and if necessary mitigated. In addition the drive aisle around the outside of the facility is critical to the efficient use of the facility and must be maintained.
- 11) Section 6.2.2.3 (Traffic Signal Priority and Preemption) – The information in this section indicates that both traffic signal priority and preemption will be used at LRT at-grade crossings. The impacts of these proposed operations must be fully evaluated based on actual proposed LRT operating characteristics to determine the impacts and appropriate mitigation of the proposed at-grade crossings.
- 12) Section 6.2.2.3 (Intersection LOS Analysis) – This section indicates that the key periods of operational analysis are the AM and PM peak hours. In some locations the noon time rush may be as significant and should be evaluated as well. This is the case in the Eden Prairie Major Center Area (general area bounded by the Prairie Center Drive / Valley View Road ring road).
- 13) Section 6.2.2.3 (Intersection LOS Analysis) – The Traffic Study included in the appendix indicated that the same growth rate was used for traffic projections throughout the corridor. The proposed LRT project spans a large geographical area with a range of development patterns. Given these differences separate growth rates should be developed for each roadway corridor.
- 14) Section 6.2.2.3 (Intersection LOS Analysis) – The operational analysis in this section indicates failing operations in the Highway 212 / Valley View Road interchange area. The operation of this corridor is extremely dependant on and sensitive to effective traffic signal coordination and any implementation of traffic signal priority or preemption is expected to significantly impact its operation. These factors make the Valley View Road crossing an inappropriate location for an at-grade LRT crossing.
- 15) Section 6.2.2.3 (Intersection LOS Analysis) – The proposed grade crossing of Mitchell Road must be fully evaluated to determine its true impacts. The methodology used in the DEIS traffic analysis assumed standard priority/preemption impacts to the Mitchell Road traffic signals which may or may not be consistent with what will be required by LRT operations. In addition the analysis must take into account the proposed development in the area including the Mitchell Road station and park and ride, impacts to effective signal coordination which is critical to the operation of the corridor, and impacts to emergency vehicle pre-emption and operation due to its frequent use and the close proximity of both the police and fire stations.

- 16) Section 6.2.2.3 (Intersection LOS Analysis) – Eagle Ridge Academy school is located at 7255 Flying Cloud Drive immediately adjacent to the proposed LRT crossing of Flying Cloud Drive. The traffic characteristics of this site including the morning and afternoon vehicle queuing need to be accounted for in evaluating and designing the proposed at-grade crossing.
- 17) Section 6.2.2.4 (Transit Station Access) – The DEIS includes no analysis of the traffic impacts of the proposed stations and park and ride facilities. These facilities must be evaluated to determine the impacts and the appropriate mitigations.
- 18) Section 6.2.2.4 (Transit Station Access) – The existing Southwest Station commercial site and park and ride currently experiences on-site congestion at peak times that occasionally impacts Technology Drive. Any proposed expansion to this site needs to evaluate both the public street and on-site impacts.
- 19) Section 6.2.2.5 (Operations and Maintenance Facility) – The section on OMF 3 fails to indicate the long term effects this proposed location will have on development and redevelopment in the Mitchell Road station area. These impacts are in direct conflict with Goal 5 of the project “Support Economic Development”. The section also fails to indicate the likely long term wetlands impacts and the expected heavy use of Wallace Road during construction.
- 20) Section 6.2.2.5 (Operations and Maintenance Facility) – The DEIS includes no analysis of the traffic impacts of the proposed Operations and Maintenance facility. This facility must be evaluated to determine its traffic impacts and any appropriate mitigations.
- 21) Section 6.2.2.6 (Building Facility Access) – This section does not indicate that the bus access ramps to / from Highway 212 and Southwest Station are anticipated to be impacted.
- 22) Section 6.2.3 (Short-Term Construction Effects) – Temporary construction impacts must be evaluated and to the extent possible minimized and mitigated. This includes providing viable access to all properties at all times. In particular construction options and techniques for the proposed tunnels and grade crossings must be fully evaluated and coordinated with the City. Also viable access will need to be provided to all properties at all times.
- 23) Section 6.3.1.4 (Bicycle and Pedestrian Facilities) – Short and long term impacts to the Minnesota River Bluffs LRT Regional Trail must be minimized and mitigated in order to maintain the use of the trail both during and after construction of the LRT.
- 24) Section 6 (General) – A north-south trail running adjacent to the proposed LRT line and connecting Valley View Road and Shady Oak Road should be evaluated during project development. The trail would improve trail and sidewalk connectivity and would enhance pedestrian and bike access to the Golden Triangle station.

- 25) Section 6 (General) - As currently shown the Town Center Station may require that a new access point to/from the south be developed. This access point will provide a secondary access to Technology Drive businesses both during and after construction. The access will also provide an important and direct connection to the Town Center.
- 26) Table 9.4 (Reasonably Foreseeable Future Actions) – The City of Eden Prairie is currently proceeding with improvements to Shady Oak Road (County Road 61) between and including the interchange at Highways 62 and 212. The northern phase of the project is currently under construction. Construction of the southern phase is expected to start in 2014 or 2015. The proposed LRT alignment passes through the Shady Oak project just to the east of the Highway 212 interchange. The Southwest LRT project will need to continue to work cooperatively with the City and other project partners to assure that design and construction issues are appropriately coordinated and to keep the Shady Oak Road project on schedule. In addition in order to limit the combined construction impacts of the projects potential options for accelerating portions of the Southwest LRT project should be investigated.
- 27) Table 9.4 (Reasonably Foreseeable Future Actions) – Improvements to Highway 5 and Highway 212 between their merge and I-494 should be included in this table. This segment of roadway is currently congested and potential improvements should be considered. The Southwest LRT project needs to work in coordination with MnDOT to assure that the project does not create a significant impediment to the future improvements along Highway 5 and Highway 212.
- 28) Section 9.6.11.4 (Water Resources Mitigation) - The use of mitigation bank credits for permanent impacts to wetlands is proposed. This would result in impacts to the immediate watershed where the impacts are located as no mitigation bank credits are available here. The document should state that they will evaluate the immediate watershed and determine if there are potential mitigation opportunities that could be developed that would provide mitigation credits and reduce impacts to the local biota.
- 29) Table 12.2-2 (Preliminary List of Required Permits) - Add Nine Mile Creek Watershed District to table for Sediment/Erosion Control Permits and Wetland Conservation Act Permit.
- 30) Appendix F (Conceptual Engineering Drawings) – The existing Lone Oak Center development (southwest quadrant of Highway 212 / Mitchell Road interchange) is not shown on the plans. This development needs to be accounted for in the design and development of the project.
- 31) Appendix F (Conceptual Engineering Drawings) – The existing Gander Mountain development (north side of Technology Drive between Prairie Center Drive and Flying Cloud Drive) is not shown on the plans. This development needs to be accounted for in the design and development of the project.
- 32) Appendix F (Conceptual Engineering Drawings) – The United Health Group development (southeast quadrant of Highway 62 / Shady Oak Road interchange) is not shown on the plans. This development needs to be accounted for in the design and development of the project.

- 33) Appendix H (Soil, Groundwater, and Dewatering Conditions – 8th page) - Not all residents in the area are on municipal water. Properties on Willow Creek Road and Willowwood (area west of Highway 212) are served by wells. There may also be some private irrigation wells.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Getschow". The signature is fluid and cursive, with a large initial "R" and "G".




Rick Getschow
City Manager

Attachments

CC: Mayor and City Council



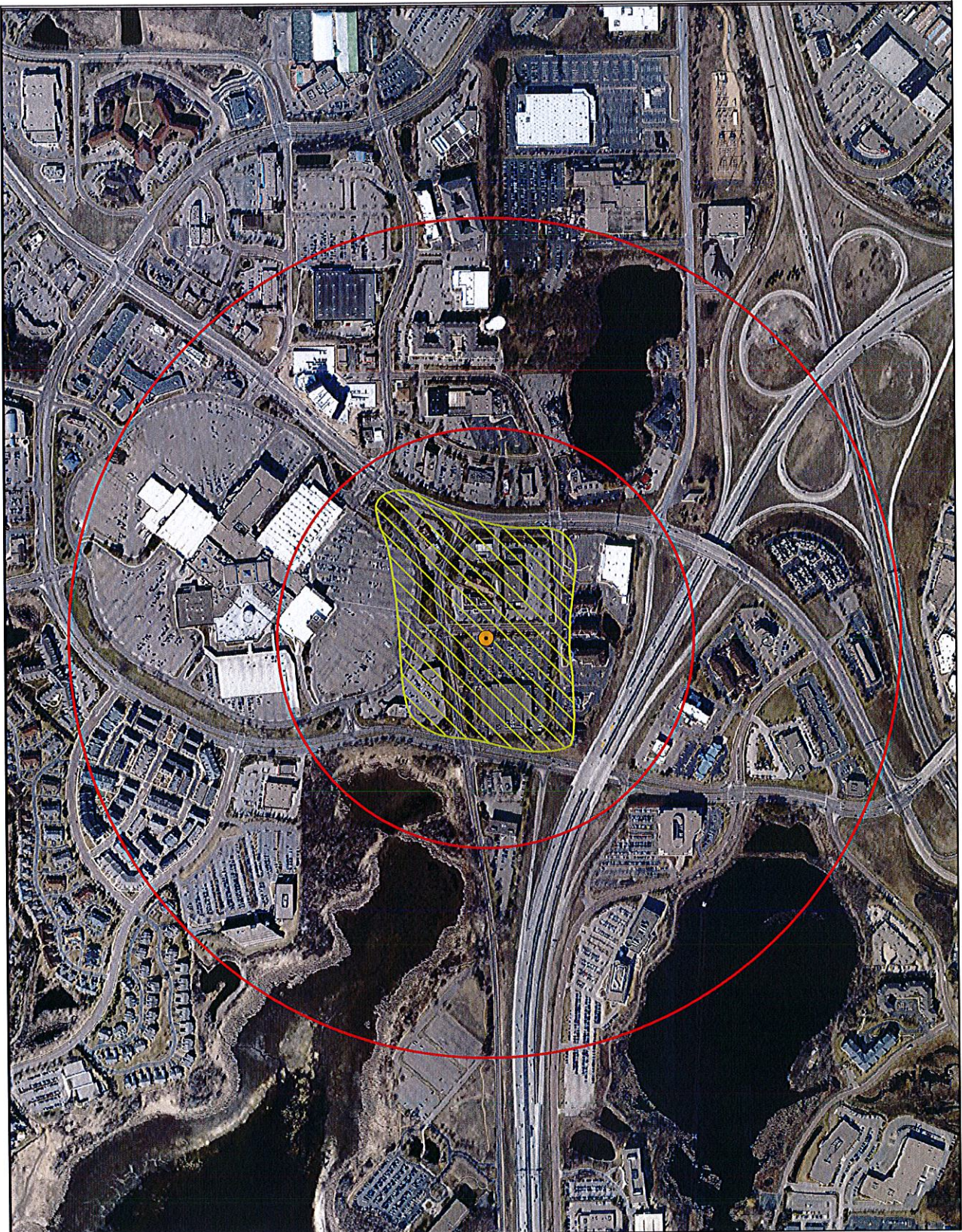
Legend

-  Center of Radius Rings
-  Station Area
-  1/4, 1/2 Mile Radius Ring




STATION AREA A

April 18, 2012





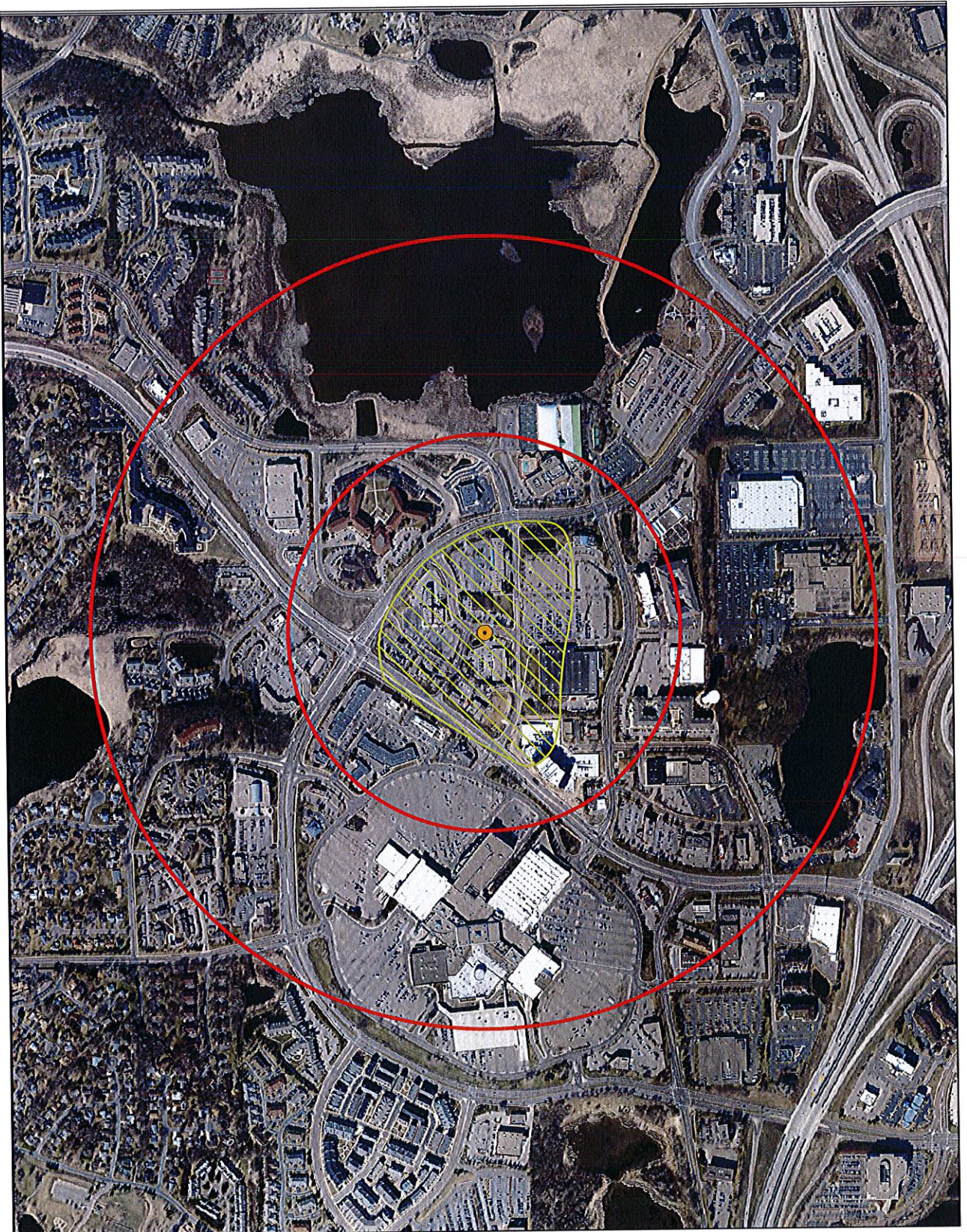
Legend

-  Center of Radius Rings
-  Station Area
-  1/4, 1/2 Mile Radius Ring




STATION AREA B

April 18, 2012





Legend

-  Center of Radius Rings
-  Station Area
-  1/4, 1/2 Mile Radius Ring

STATION AREA C

April 18, 2012



**CITY OF EDEN PRAIRIE
HENNEPIN COUNTY, MINNESOTA**

RESOLUTION NO. 2012-161

**SUBMIT COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
FOR THE SOUTHWEST TRANSITWAY**

WHEREAS, the Southwest Transitway is a proposed 15-mile light-rail line serving Eden Prairie, Minnetonka, Hopkins, St. Louis Park and Minneapolis; and

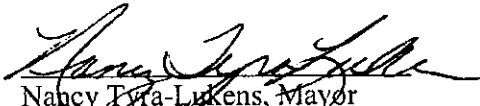
WHEREAS, the Federal and state environmental rules require that an Environmental Impact Statement (EIS) be prepared for the proposed Southwest Transitway project. The EIS process includes the preparation of a Draft Environmental Impact Statement (DEIS), which must be made available for public review and comment; and

WHEREAS, the Southwest Transitway Draft Environmental Impact Statement (DEIS) is available for public comment through December 11, 2012; and

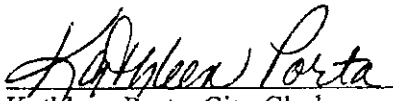
WHEREAS, the City Council appreciates the opportunity to review the DEIS and desires to respectfully submit comments on the DEIS.

NOW, THEREFORE, BE IT RESOLVED that the Eden Prairie City Council authorizes the City Manager to submit comments on the DEIS consistent with the November 15, 2012 draft comment letter during the DEIS public comment period.

ADOPTED by the Eden Prairie City Council on November 20, 2012.


Nancy Tyra-Lukens, Mayor

ATTEST:


Kathleen Porta, City Clerk

Potential MCA Station Locations

Location A – Town Center

- Guide Plan Approved Town Center Location
- Close proximity to existing and future housing and employment densities
- Potential for planned re-development
- Walkable to Eden Prairie Center (across Flying Cloud Dr)
- Anticipated Moderate Track Alignment Impacts

Location B – EPC Northeast

- Close proximity to Eden Prairie Center
- Potential for re-development
- Walkable to existing and future housing and employment uses in Town Center (across Flying Cloud Dr)
- Anticipated Moderate Track Alignment Impacts

Location C – MCA South

- Close proximity to Presbyterian Homes and walkable to residential uses south of MCA (across Prairie Center Dr)
- Walkable to housing and employment uses in Town Center
- Walkable to Eden Prairie Center (across Flying Cloud Dr)
- Potential for re-development
- Anticipated High Track Alignment Impacts

Southwest Transitway

Town Center Station Location Considerations

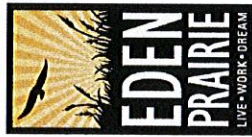
General

- The feasibility of more centrally located and walkable Town Center Station should be evaluated during the Preliminary Engineering Process
- Minimize Town Center Station parking. If possible re-allocate parking to Southwest Station and Mitchell Road.

Location Priorities

- Walkability to Housing and Employment (Ridership Potential)
- Close proximity to Eden Prairie Center. Station within ¼ mile to a mall entrance.
- Maximize potential redevelopment and reinvestment opportunities.
 - Considered recent investments in area
- Separation from Southwest Station LRT Station
- Acceptable traffic impacts of track alignment

CITY OF EDEN PRAIRIE, MINNESOTA
8080 Mitchell Rd | Eden Prairie, MN | 55344-4485



CITY OF EDEN PRAIRIE, MINNESOTA
8080 Mitchell Road, Eden Prairie MN 55344-4485

Hennepin Co. Housing, Community Works & Transit
Attn: Southwest Transitway
701 Fourth Ave. S., Suite 400
Minneapolis, MN 55415





"Ringold, Jennifer B."
<JRingold@minneapolisparks.org>

12/06/2012 01:59 PM

To "swcorridor@co.hennepin.mn.us"
<swcorridor@co.hennepin.mn.us>
cc "Miller, Jayne S." <JMiller@minneapolisparks.org>, "Erwin,
John" <JErwin@minneapolisparks.org>, "Tabb, Anita"
<ATabb@minneapolisparks.org>,
bcc

Subject Minneapolis Park and Recreation Board SW LRT DEIS
Comment Letter

Dear Project Manager,

Attached you will find a comment letter from the Minneapolis Park and Recreation Board for the Southwest Transitway's Draft Environmental Impact Statement. This was approved by the Minneapolis Park and Recreation Board at its December 5, 2012 regular meeting.

We will also send a paper copy for your records.

Best, jbr

Jennifer Ringold
Manager of Public Engagement and Citywide Planning
Minneapolis Park & Recreation Board
2117 West River Road
Minneapolis, MN 55411

Phone: 612-230-6464
Cell: 612-516-0727

Minneapolis Park and Recreation Board Southwest Transitway DEIS Comment Letter



Lake Calhoun



Cedar Lake



Lake of the Isles



Lake of the Isles

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Transmittal Letter

December 5, 2012



Administrative Offices
2117 West River Road
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3800 Bryant Avenue South
Minneapolis, MN 55409-1000

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612-230-6500

www.minneapolisparcs.org

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Re: Minneapolis Park and Recreation Board Comments on the Southwest Transitway Draft Environmental Impact Statement

Dear Project Manager:

The Minneapolis Park and Recreation Board (MPRB) welcomes this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Southwest Transitway (LRT) project. In collaboration with its appointed Community Advisory Committee, the MPRB prepared the following comment letter for Segment A of the Locally Preferred Alignment (LPA) for the project. It contains the MPRB's desired outcomes for the project relative to historical, cultural, visual, recreational, social, environmental, and safety impacts on the park and recreation resources it owns, manages, or maintains.

In 1883, the Minneapolis Park and Recreation Board was created by an act of the Minnesota State Legislature and a vote of Minneapolis residents. It serves as an independently elected, semi-autonomous body responsible for governing, maintaining, and developing the Minneapolis park system. The MPRB's mission is as follows:

The MPRB shall permanently preserve, protect, maintain, improve, and enhance its natural resources, park land, and recreational opportunities for current and future generations.

The MPRB exists to provide places and recreation opportunities for all people to gather, celebrate, contemplate, and engage in activities that promote health, well-being, community, and the environment.

The MPRB is also one of 10 regional park implementing agencies. It works with the Metropolitan Council to acquire and develop regional parks and trails to protect natural resources and provide outdoor recreation for public enjoyment in the Metropolitan Area. In 2011, based on Metropolitan Council annual use estimates, the regional parks and trails that are impacted by this alignment received over 6 million visits.

President
John Erwin
Vice President
Liz Wielinski
Commissioners
Brad Bourn
Bob Fine
Carol A. Kummer
Jon C. Olson
Anita Tabb
Scott Vreeland
M. Annie Young
Superintendent
Jayne Miller

Secretary to the Board
Michael P. Schmidt



The MPRB is obligated to ensure that parks and trails and the interests of current and future park and trail users are not substantially impaired by the project. It is within this context that the MPRB makes the comments contained in this letter. There are several overarching messages the MPRB wishes to express regarding the Southwest Transitway:

- MPRB, in general, is supportive of light-rail transit.
- Current development and public use of the corridor within Minneapolis has an open and natural character that includes portions of the Minneapolis Chain of Lakes Regional Park, Grand Rounds National Scenic Byway, Kenilworth Regional Trail, and Cedar Lake Regional Trail. Park design in this area focuses on serenity, habitat restoration, minimal development, and passive recreation. To retain the area's character the water table levels and quality, cultural landscapes, habitat, and open space must be protected and preserved.
- Several topics of keen interest to the MPRB, including noise, vibration, and visual impacts, are noted in the DEIS as requiring further analysis during preliminary engineering. To monitor and protect the parks, trails, and recreation areas of this project that are within its jurisdiction, the MPRB expects to have a central role in the design of Segment A.
- MPRB does not support the co-location alternative.

Thank you for this opportunity to comment on the DEIS for the LRT. If you have any questions, please do not hesitate to contact Jennifer Ringold, Manager of Public Engagement and Citywide Planning, at 612-230-6464 or jringold@minneapolisparcs.org.

Sincerely,



John Erwin

President, Minneapolis Park and Recreation Board

Introduction

The Minneapolis Park and Recreation Board (MPRB), a semi-autonomous government agency, was established in 1883 by the Minnesota State Legislature. It owns, operates, or maintains park land within the cities of Minneapolis, Golden Valley, Richfield, Robbinsdale, Saint Louis Park, and Saint Anthony. The MPRB is also one of 10 regional park implementing agencies that works with the Metropolitan Council to acquire and develop parks and trails to protect natural resources and provide outdoor recreation for public enjoyment in the Metropolitan Area.

In 2013, the MPRB will celebrate 130 years of providing outstanding park and recreation services to residents and visitors of Minneapolis. In citywide surveys, residents often remark that the Minneapolis park system is essential to their quality of life and to the identity of the city. Founders of the system, such as H. W. S. Cleveland and Theodore Wirth, understood the role parks play in a healthy, livable, and balanced city. They made preserving land for future generations a priority. Their success shaped the character of Minneapolis and continues to improve people's lives.

Segment A of the Locally Preferred Alternative (LPA) of the Southwest Transitway (LRT) and its station areas include, cross, and are adjacent to neighborhood and regional parks and regional trails that are owned or maintained by the MPRB. These include the following (see [map](#) below):

- Minneapolis Chain of Lakes Regional Park
 - Cedar Lake Park
 - Cedar Lake
 - Kenilworth Channel
 - Lake of the Isles
 - Lake Calhoun
 - Cedar Lake Parkway and Trails (bicycle and pedestrian)
 - Dean Parkway and Trails
- Grand Rounds National Scenic Byway
- Kenilworth Regional Trail (bicycle and pedestrian)
- Cedar Lake Regional Trail (bicycle and pedestrian)
- Park Siding Park

With its extensive land holdings and maintenance responsibilities, the MPRB is obligated to identify the historical, cultural, visual, recreational, social, environmental, and safety issues and impacts related to Segment A of the LPA and ensure that these parks, trails, and the current and future interests of park and trail users are protected.

MPRB Community Advisory Committee

On 1 September 2010, the MPRB approved the following charge for the appointed Community Advisory Committee (CAC):

Prepare recommendations to the Board on the contents of a formal Comment Letter in response to the Draft Environmental Impact Statement for the proposed Southwest Light Rail Transit Alternative 3A. The recommendations of the CAC shall focus on desired outcomes relative to historical, cultural, visual, recreational, social, environmental, and safety issues as they relate to lands owned or managed by the Minneapolis Park and Recreation Board.

Appointers and CAC members are below:

Appointing Person or Group	Appointee
Board President John Erwin	Scott Neiman, Chair
MPRB Commissioner Anita Tabb, District 4	Eric Sjoding
MPRB Commissioner Brad Bourn, District 6	Kendal Killian
MPRB Commissioner Annie Young, At-large	Caitlin Compton
MPRB Commissioner Bob Fine, At-large	Matt Perry
Bryn Mawr Neighborhood Association	Barry Schade
Cedar-Isles-Dean Neighborhood Association	John Erickson
Cedar Lake Park Association	Brian Willette
Kenwood Isles Area Association	Jeanette Colby
Lowry Hill Neighborhood Association	George Puzak
West Calhoun Neighborhood Council	Meg Forney
Harrison Neighborhood Association	Maren McDonell
Hennepin County Commissioner Dorfman	Tim Springer
Council Member Goodman – Ward 7	Neil Trembley
Council Member Tuthill – Ward 1	D'Ann Topoluk
Council Member Hodges – Ward 13	Ben Hecker
Council Member Samuels – Ward 5	Vicki Moore
Mayor of Minneapolis R.T. Rybak	Jerry Van Amerongen

Supported by MPRB staff lead Jennifer Ringold and consultant Anne Carroll (Carroll, Franck & Associates), the CAC began meeting in September 2010, suspended work for most of 2011 with the DEIS delays, and scheduled their 2012 meetings to coincide with the anticipated DEIS release. Working from comprehensive background information and their own knowledge and community connections, the CAC generated an increasingly detailed set of issues and preferred MPRB outcomes. Once the DEIS was released in October 2012, the CAC created a “crosswalk” connecting DEIS contents with their issues and outcomes, which was then converted to this Comment Letter. This final version of the Comment Letter was formally approved by the MPRB Board on *December 5, 2012*.

Comment Letter Structure

Beginning with the entire corridor, the content of this comment letter is organized by location from north to south as shown in the Table of Contents and on the [map](#) below.

The first section presents MPRB’s adopted opposition to the co-location alternative. The remaining sections focus on the locations where the MPRB has an interest in the design and implementation of the LRT project, they include the following subsections:

- **Location and Description:** This describes the location and why it was selected by the MPRB for DEIS comments.
- **Issues:** The issue and why it is important at the particular location is described. For each issue, the MPRB then provides one or more of the following:
 - **Outcomes:** Critical *outcomes* that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.
 - **Statements:** MPRB’s adopted positions on critical issues or processes that must be resolved, reconciled, reevaluated, or otherwise included in near-term design work and decision-making.
 - **Corrections:** Identified errors in the DEIS that must be corrected for the FEIS and subsequent work.

Images are courtesy of MPRB unless otherwise noted; specifically, most aerials and maps are from Google and current to 2012, and are cited.

Corridor and Comment Location Map



Co-Location Alternative

According to the Section 4(f) review of the co-location alternative in the DEIS, this alternative will result in permanent loss of park land and impairment to MPRB properties and uses.

Below is the statement that the MPRB has adopted regarding co-location.

Statement: The MPRB opposes the co-location alternative and supports the co-location findings presented in the DEIS regarding Section 4(f) and Section 106 impacts to lands owned or maintained by the MPRB. Based on a review of the documents, the permanent loss of park lands, impacts to regional trail functionality and capacity, and harm to the Grand Rounds Historic District (eligible for the National Register of Historic Places) cannot be mitigated within the corridor.

1 Entire Corridor

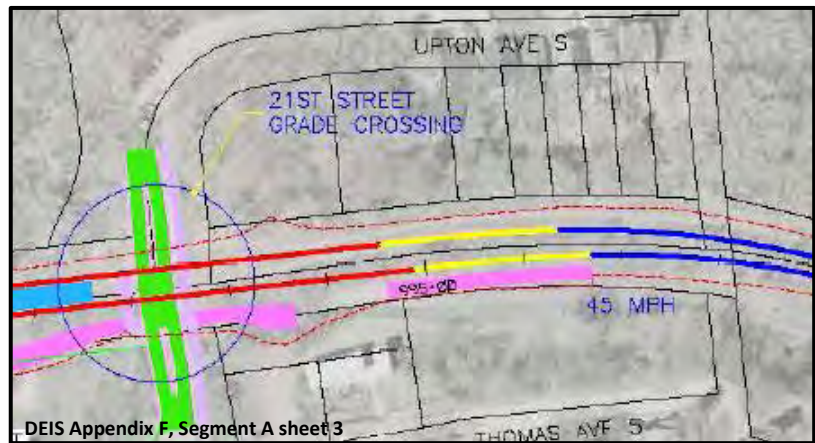
1.1 Location and Description

This section includes issues and outcomes that apply to all or most of the corridor. The sections that follow this focus on issues and outcomes that are specific to certain locations. See [map](#) above.

1.2 Issue: Section 4(f) analysis

A primary concern for the MPRB is protecting park land and recreational opportunities within and adjacent to the corridor for current and future generations. Chapter 7 of the DEIS contains the Section 4(f) evaluation of the project. It identifies potential permanent use, temporary use, and constructive use of park land for the project. For Segment A of the LPA it shows that 0.016 acres may be a potential temporary use and does not identify any potential permanent or constructive uses.

Permanent and Temporary use: Within an urban setting continuous park land and linear corridors are critical to habitat management and connectivity for park users. According to the Appendix F *LRT Alternative Segment Plan and Profile STA: 972+00 -1023+00* preliminary concepts for the area near 21st Street, additional park land may be needed to accommodate the westernmost LRT track. The analysis of park lands that are covered by Section 4(f) regulations in the DEIS does not account for this land.



Constructive use: The DEIS articulates (7.1) that “use” of a Section 4(f) resource occurs when, among other things, “There is no permanent incorporation of land, but the proximity of a transportation facility results in impacts so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired (e.g., ‘constructive use’).” Based on this definition, the MPRB anticipates that park land and park users may experience long-term impacts of the LRT due to noise, vibration, visual impacts, and safety. Park lands that are eligible for the National Register of Historic Places are considered especially vulnerable to these impacts. Depending on final design, these impacts may be so severe that they would constitute a *constructive use* of protected properties under Section 4(f) regulations.

Below are the critical statements and outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.2.1 **Statement:** Park lands near 21st Street that are shown as being used for the LRT track in the conceptual designs must be reevaluated under Section 4(f) to identify all permanent and temporary uses.
- 1.2.2 **Statement:** As the design progresses, park lands must be evaluated under Section 4(f) to identify all permanent and temporary uses.
- 1.2.3 **Statement:** As the design progresses, park lands must be reevaluated under Section 4(f) to determine whether there are constructive uses of park land due to long-term noise, vibration, and visual impacts.
- 1.2.4 **Statement:** As the design progresses, park lands must be reevaluated under Section 4(f) to determine whether there are constructive uses of park land due to long-term impacts on parks that are considered eligible for the National Register of Historic Places.

1.2.5 **Outcome:** Park land along the corridor is preserved in the same or better condition.

1.2.6 **Outcome:** Park property is not used permanently as part of LRT development.

1.3 Issue: Design character

Aside from Park Siding Park, the park land the MPRB owns, manages, and maintains adjacent to the corridor is classified as a regional park. A regional park according to the Metropolitan Council's 2030 Regional Parks Policy Plan is "area of natural or ornamental quality for nature-oriented outdoor recreation such as picnicking, boating, fishing, swimming, camping, and trail uses." Park Siding is considered a neighborhood park by the MPRB which means it is a block or less in size and provides basic facilities within a neighborhood.

The MPRB recognizes that current development and public use of the corridor within Minneapolis from the St. Louis Park boundary to the Penn Station has an open and natural area character that includes portions of the Minneapolis Chain of Lakes Regional Park. Portions of this area are within the Grand Rounds Historic District that is eligible for the National Register of Historic Places and are included within an Important Bird Area as designated by the National Audubon Society. Park design in this area focuses on serenity, habitat restoration, minimal development, and passive recreation. Minimizing impacts to water table levels and quality, cultural landscapes, habitat and open space will be critical to retaining this area's character. LRT and station area design that is sensitive to these issues is essential to protect the activities, features, and attributes of the park land in this corridor.



The DEIS makes several references to this issue, including the following:

- 4.1.3.6 Groundwater Sensitivity, page 4-19: Several areas in the study area lie within zones of very high sensitivity to pollution of the water table system...Portions of the land between Cedar Lake and Lake of the Isles....
- 4.1.4.2 Groundwater, page 4-21: The Build Alternatives may have long-term impacts on groundwater if a permanent water removal system (dewatering) is required. Permanent water removal is anticipated where the cut extends below the water table. There is a probable need for permanent water removal at one cut on both Segment 1 and Segment 3, and possible needs on Segment A and at a second cut along Segment 3, because of shallow groundwater. Evaluations and associated impacts of permanent water removal at the major excavations are summarized in Appendix H.
- 4.3.3.1 Riparian Habitat Areas, page 4-50: The LRT 3A (LPA) passes over several riparian areas that are associated with Purgatory Creek, South Fork Nine Mile Creek, Nine Mile Creek, Minnehaha Creek and the unnamed channel [Kenilworth Channel] between Lake of the Isles and Cedar Lake. The alternative would impact native wetland or riparian habitats, which are typified by non-native woody wetland habitat, non-native emergent wetland habitat or open water habitat (MLCCS 2008). The development of linear ROW along portions of this alignment has fragmented many wetland habitats on both sides of these features. Development of this alternative would likely increase the fragmented nature of wetland and riparian habitats.
- 3.1.2.4, Land Use and Socioeconomics, page 3-16: Northwest of Lake Calhoun and between Cedar Lake and Lake of the Isles the city has established the Shoreland Overlay District that specifies development guidelines within a half-mile radius around each of these lakes. Although the ordinance does not prohibit

transportation uses or facilities, it does specify guidelines for controlling both point source and non-point source pollutant discharge within the Shoreland Overlay District.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.3.1 **Statement:** MPRB insists that stormwater impacts to Minneapolis water bodies result in no increased volume of runoff and no increased pollutant loads.
- 1.3.2 **Outcome:** Minneapolis Chain of Lakes Regional Park and adjoining park land remains a quiet, tranquil, and natural park destination.
- 1.3.3 **Outcome:** The area between Lake Street and I-394 is naturally beautiful and serene.
- 1.3.4 **Outcome:** Natural wildlife habitat and serenity of the trail and park land are maintained.
- 1.3.5 **Outcome:** Any permanent dewatering methodologies applied to the corridor protect water table levels and quality, and habitat within the park lands that is dependent on those water levels.
- 1.3.6 **Outcome:** Permeable paving materials are incorporated to reduce stormwater impacts to park land when hard surfaces are added by the project.
- 1.3.7 **Outcome:** The Chapter 551, Article VI Shoreland Overlay District of the City of Minneapolis' Code of Ordinances is followed to preserve and enhance the environmental qualities of surface waters and the natural and economic values of shoreland areas within the city.

1.4 Issue: Trail access, use, and maintenance

The MPRB owns or maintains trails that are within or cross the LPA Segment A corridor. The MPRB is concerned that the LRT frequency and speed will impact these trails and users by reducing access to the trail from local neighborhoods and park lands, inhibiting flow and speed, adding time delays, introducing use/user conflicts and safety problems, and making the trails more difficult to maintain year-round. The MPRB is concerned that the full cost of reconstructing and resurfacing these federally funded trails will not be included in the project budget.



The DEIS makes several references to the importance of retaining the trails. It also mentions the anticipated increased use that will result from population increases and transit development. The references include:

- 10.5.3.1 Improved Multimodal Environment, page 10-18: Transitway project will improve the existing pedestrian and bicycle infrastructure along the alignment, and improve the safety of pedestrians and bicyclists through implemented design guidelines. All pedestrian facilities will be designed in accordance with current design standards and Americans with Disabilities Act (ADA) requirements to ensure access and mobility for all.
- 9.6.6.3 Anticipated cumulative impacts, page 9-23: The urban and suburban areas along the Southwest Transitway, as in the entire Twin Cities area, are expected to continue to develop and become denser. The Southwest Transitway's proposed stations in combination with RFFAs- especially residential projects – will

be part of this trend. Because fully developed urban areas typically have little opportunity for the creation of new parks and recreation areas, the existing parks are likely to become more crowded and intensely used.

- Appendix F, Legend for Plan, page 5: The grading for the trails shown will be included in the project cost, however the surfacing for the trails will not be included with the project costs. Trail surfacing must be performed at the expense of others.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.4.1 **Statement:** As the implementing agency of regional parks and trails in the City of Minneapolis, the MPRB insists that the full cost of reconstructing and resurfacing trails that are impacted by the project is borne by the project budget.
- 1.4.2 **Statement:** The project should further examine the advantages and disadvantages of the trail being aligned on the west or east side of the LRT. The route analysis should consider the number of times the trail must cross the LRT, changes in trail length, trail connections, trail access points, and park land access.
- 1.4.3 **Outcome:** There is adequate access to the Kenilworth Regional Trail from both sides of the LRT tracks, and access points are a reasonable walking distance apart.
- 1.4.4 **Outcome:** The trail alignment minimizes the number of times that the trail crosses the LRT, optimizes trail connections, maintains similar travel distances, provides sufficient access points, and ensures access to park lands.
- 1.4.5 **Outcome:** Bike and pedestrian trails remain with the same or better design quality and width as current trails; these include those that run along and across the corridor, as well as access trails.
- 1.4.6 **Outcome:** The trail design meets the needs of current and projected users.
- 1.4.7 **Outcome:** The trail is designed for a 20 mph design speed (including straight-line ascents and descents at bridges).
- 1.4.8 **Outcome:** Bicycle and walking trail users have a positive, linear park-like experience, including being free of obstructions, having a 2-foot or greater buffer on each side of all trails, and retaining a sense of connection to open space.
- 1.4.9 **Outcome:** All trail connections are maintained or improved.
- 1.4.10 **Outcome:** At all points along the corridor, and especially at the narrowest locations, sufficient space remains for trails, trail users, and year-round maintenance vehicles and crews.

1.5 Issue: Noise and Vibration

The MPRB is concerned about the LRT noise and vibration impacts on park lands and park and trail users due to the high number of trains that will travel through the corridor daily. An increase from a few freight trains per day to hundreds of LRT trains will dramatically increase the amount of time that park and trail users are exposed to noise and vibration. This could substantially diminish the park and recreation experience for park and trail users.

For noise, the MPRB is particularly concerned that park lands in the corridor are erroneously classified as a Category 3 land use. In FTA's land use categories for Transit Noise Impact Criteria, Category 3 is most commonly associated with institutional land uses and can be used for some types of parks. By contrast, Category 1 is for tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use. Category 1 is more closely aligned with the regional park classification that applies to the majority of park land in the area.

The DEIS makes several references to this issue, including the following:

- 4.7.3.5 Assessment, page 4-92: There is one moderate impact to a Category 3 land use. The impact is due to very low ambient background noise levels found in the walking trails of the Cedar Lake portion of the Minneapolis Chain of Lakes Regional Park combined with close proximity to the tracks and bell use at grade crossings and crosswalks. This may not apply to the entire Cedar Lake portion of the park, especially in areas where park-goers themselves create higher noise levels, and area of the park farther from the tracks.
- 4.8.6 Mitigation, page 4-118: Detailed vibration analyses will be conducted during the Final EIS in coordination with Preliminary Engineering. The Detailed Vibration Assessment may include performing vibration propagation measurements. These detailed assessments during the Final EIS/preliminary engineering phase have more potential to reduce project-related effects than assessments of mitigation options at the conceptual engineering phase of the project. Potential mitigation measures may include maintenance, planning and design of special trackwork, vehicle specifications, and special track support systems such as resilient fasteners, ballast mats, resiliently supported ties, and floating slabs.

Below are the critical statements and outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.5.1 **Statement:** Category 1 is most consistent with the type of parks and open space the MPRB owns or maintains adjacent to or within the corridor. Noise impacts on park lands and users must be reevaluated under the standards set for Category 1 land uses.



1.5.2 **Outcome:** The vibration impacts are minimized for park and trail users.

1.5.3 **Outcome:** The noise impacts are minimized for users of parks and trail and park users and do not exceed the noise standards set for Category 1 in adjacent park land and along the trail.

1.5.4 **Outcome:** Technologies are incorporated that reduce track noise and vibration.

1.5.5 **Correction:** In 4.7.3.5 page 4-92, it appears that Segment 4 is referenced instead of Segment A.

1.6 Issue: Visual appeal

The MPRB is concerned about the impacts on park land and users of the parks and trails by visual impacts of the LRT. These concerns include the impacts on view sheds within and outside of the parks, especially those that are part of the Grand Rounds Historic District, which is eligible for listing on the National Register of Historic Places.

The DEIS makes several references to this issue, including the following:

- 3.6.3.3 Visual impacts, page 3-115: The proposed alignment is on a bridge over Cedar Lake Parkway. Visual impacts on sensitive receptors adjacent to the corridor in the multi-family residential parcel and Cedar Lake Parkway could be substantial.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.6.1 **Outcome:** The visual impact of the LRT and related infrastructure is minimized for trail and park users and honors the historic character of the Grand Rounds when it crosses Cedar Lake Parkway and the Kenilworth Channel.

1.6.2 **Outcome:** The train lights have minimal visual impacts on trail users.

1.7 Issue: Safety

Safety of park and trail users is a critical objective for the MPRB. This includes using design to reduce risks from user conflicts or unexpected hazards and ensuring adequate access to park facilities when the LRT is in operation. Delays in fire, police, and emergency medical response to park facilities, especially beaches, may result from the high number and frequency of trains that are projected to travel through the corridor.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.7.1 **Outcome:** Adequate fire safety infrastructure exists within or proximate to the corridor such that fire suppression and response times meet relevant laws and standards.
- 1.7.2 **Outcome:** Fire, police, and emergency medical personnel and equipment are able to access park lands adjacent to the corridor and provide response times that meet relevant laws and standards.
- 1.7.3 **Correction:** The Minneapolis Park Police should be included in the references to police agencies related to the corridor.



Timely public safety access is essential

1.8 Issue: Construction

The MPRB recognizes that Minneapolis has become one of the top bicycling communities in the country. As such, trail users rely on high quality trail facilities year round for recreation and commuting. A detour that requires significant rerouting of trail users or an extended closure of a trail will be a barrier to trail users on the western side of Minneapolis and the metro area.

Construction can result in extensive damage to vegetation and trees through removals and introduction of invasive species. The former results in a diminished quality of the park and recreation experience for trail and park users, the later results in long-term habitat management issues for MPRB staff. Additionally, construction can result in the altering the ground and surface water levels and quality if Best Management Practices (BMPs) are not implemented.

The DEIS makes several references to this issue, including the following:

- 6.3.3.1 page 6-60: Short-term construction effects to bicyclists and pedestrians are also anticipated in all Build Alternatives. In Segments 1, 4, A, and C, some disruptions to the existing regional trails are anticipated during construction. The extent to which the trails would be available for use throughout the process of relocation will be determined during Preliminary Engineering. Disruptions to the existing sidewalk network are anticipated in all Build Alternatives.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.8.1 **Outcome:** Surface and groundwater quality is protected during construction.
- 1.8.2 **Outcome:** Reasonable and safe alternative routes are provided for trail users when sections are closed

during construction.

- 1.8.3 **Outcome:** Any flora that is lost to construction or LRT use is replaced with flora that is in accordance with MPRB plans, with monitoring through a plant survey and replacement for five (5) years after construction is complete.
- 1.8.4 **Outcome:** Soils and slopes are stabilized during construction.
- 1.8.5 **Outcome:** Construction dewatering protects water table levels and habitat within park lands that is dependent on those water levels.
- 1.8.6 **Outcome:** Construction practices prevent introduction of new invasive species to park lands and waters.



MPRB Prairie Maintenance near Cedar Lake Park

2 Linden Avenue

2.1 Location and Description

Linden Avenue serves as an informal trail access point, as it is used primarily by city maintenance vehicles to access the asphalt and concrete recycling facility. Trail users at this access point regularly deal with high vehicular traffic with the nearby entrance to I-394. At this location, the LRT line and trail separate from MPRB-owned land.

2.2 Issue: Access, flow

The MPRB is concerned that all future work in this area be based on a comprehensive design and coordinated approach. This location requires formal and safe trail access, and cyclists need continuous flow and speed on the federally funded Cedar Lake Regional Trail.

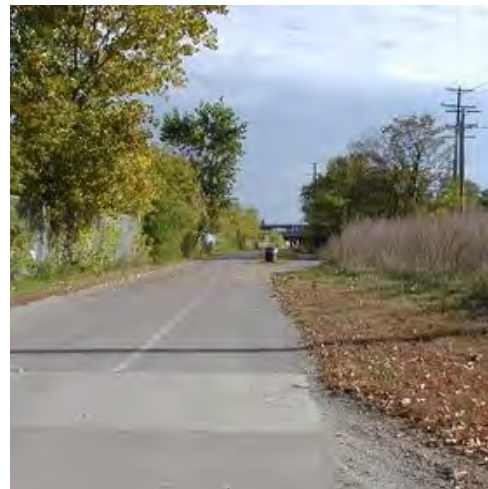


Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 2.2.1 **Outcome:** Trail users easily and safely access the Cedar Lake Regional Trail.
- 2.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 2.2.3 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.
- 2.2.4 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.



From Linden Avenue junction, looking southwest along Cedar Lake Regional Trail



From Linden Avenue junction, looking northeast along Cedar Lake Regional Trail

3 Luce Line Regional Trail Junction

3.1 Location and Description

At this location the Luce Line Regional Trail intersects with the Cedar Lake Regional Trail, currently via a bridge over the industrial area and freight rail line, and spiral ramps at each end.

This is a critical connection in the regional trail system, and also provides access to Bryn Mawr Meadows Park.



3.2 Issue: Access, flow

The MPRB is concerned that all future work in this area be based on a comprehensive design and coordinated approach so that trail and park access be maintained, as well as flow and speed on the regional trails.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 3.2.1 **Outcome:** Trail users easily and safely make connections between Bryn Mawr Meadows Park, the Luce Line Regional Trail, and the Cedar Lake Regional Trail.
- 3.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 3.2.3 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.
- 3.2.4 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.



Luce Line Regional Trail crossing to connect with the Cedar Lake Regional Trail

4 Spring Lake Trail Junction

4.1 Location and Description

At this location Cedar Lake Regional Trail users pass under I-394 and easily connect to the nearby parks and trails including Spring Lake, Kenwood Parkway, and Parade Stadium, and travel beyond to the Minneapolis Sculpture Garden, Loring Park, and the Grand Rounds National Scenic Byway.

4.2 Issue: Access, flow, and connectivity

As a critical access point to MPRB park lands and the Grand Rounds, the MPRB is concerned that safe and easy access and connectivity is retained. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.2.1 **Outcome:** Cedar Lake Regional Trail users easily and safely connect to Spring Lake Park, Grand Rounds, other parks, parkways, and Van White Boulevard.
- 4.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 4.2.3 **Outcome:** The design prioritizes connectivity to neighborhoods and natural amenities.

4.3 Safety

In this small space under I-394, the MPRB is concerned about public safety and emergency vehicle access. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.3.1 **Outcome:** Fire, police, and emergency medical personnel and equipment can access the trail and Spring Lake and provide response times that meet relevant laws and standards.

4.4 Issue: Comprehensive approach

As with many locations along the LRT, this area will likely be subject to future development. The MPRB is concerned about protecting the integrity and natural features of Spring Lake and full functionality of the Cedar Lake Regional Trail. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.4.1 **Outcome:** Spring Lake and the area's natural features are preserved and protected.
- 4.4.2 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.
- 4.4.3 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.



From junction, looking southeast toward Spring Lake

5 Bryn Mawr Meadows Park

5.1 Location and Description

Bryn Mawr Meadows Park is an active neighborhood park with citywide appeal. Amenities include ball fields, tot-lots, wading pools, and tennis courts. The park is adjacent to the Cedar Lake Regional Trail and LRT line. Currently parks users are connected to the Cedar Lake Regional Trail via a bridge over the industrial area and freight rail line, and spiral ramps at each end.

5.2 Issue: Access and safety

The MPRB is concerned about ensuring that people from throughout the community can access both this heavily used park *and* the Cedar Lake Regional Trail from this area, and that the trail remains fully functional.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

5.2.1 **Outcome:** Communities on both sides of the LRT safely and easily access the Cedar Lake Regional Trail and Bryn Mawr Meadows Park.

5.3 Issue: Visual appeal

The MPRB is concerned that this large and active park retain its open and natural feel. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

5.3.1 **Outcome:** The LRT blends in visually with the natural setting of the area.

5.4 Issue: Comprehensive approach

The MPRB is concerned that all future work in this area be based on a comprehensive design and coordinated approach.

5.4.1 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.

5.4.2 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.



Bryn Mawr Park, looking south from Morgan Avenue

6 Cedar Lake Regional Trail and LRT Crossing Area

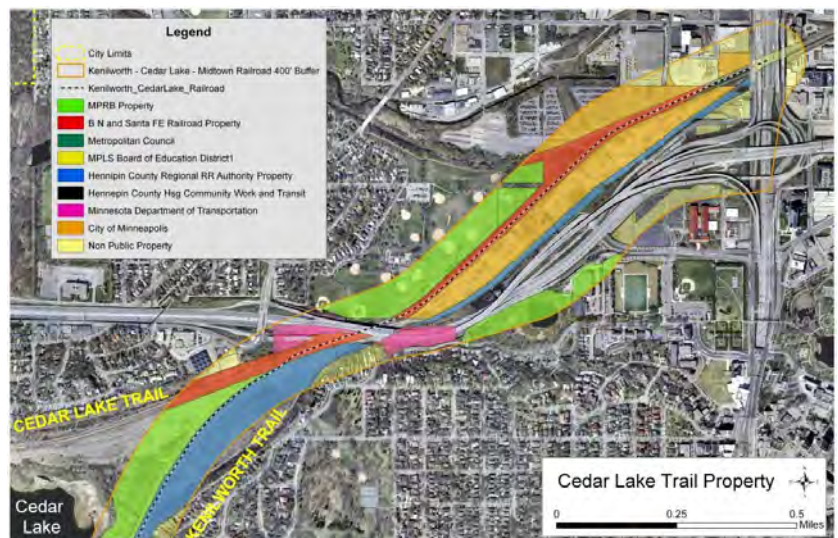
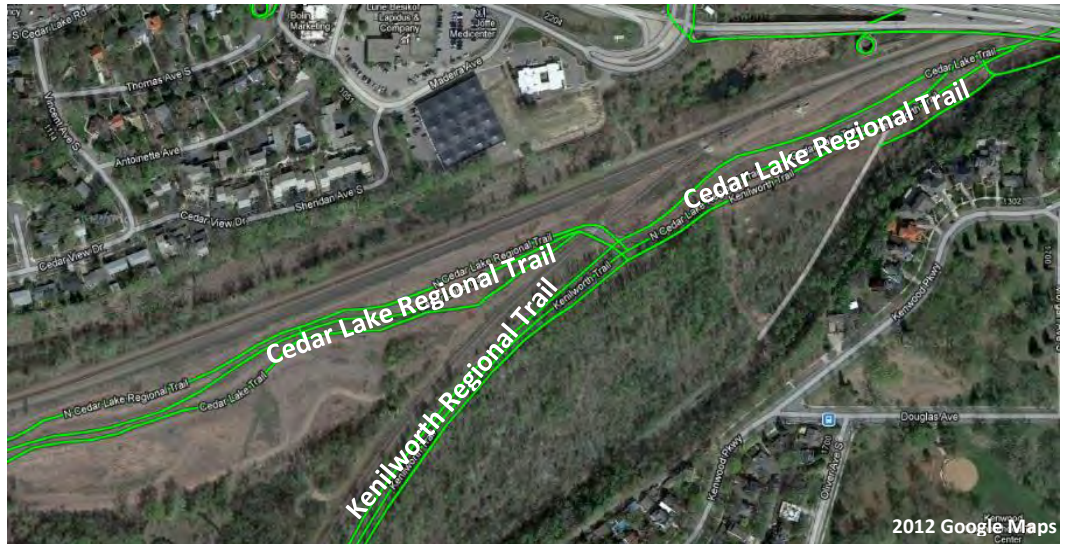
6.1 Location and Description

The federally funded Cedar Lake Regional Trail carries commuter and recreational bicyclists and pedestrians between downtown Minneapolis and the western suburbs.

At this location the trail junctions with the Kenilworth Regional Trail and the LRT follows the Kenilworth alignment

south. In this area the bike trails are separated into north- and south-bound, and there is a separate pedestrian trail. The land in this area is owned by the County and the MPRB. Per agreement, all of the trails are maintained by the MPRB.

Into this already complex area the LRT brings dramatically increased challenges (6.3.2.4).



6.2 Issue: Safety, use, access, connectivity

In 2011, according to the Metropolitan Council's annual visit estimates, Kenilworth Regional Trail had approximately 624,400 visits and the Cedar Lake Regional Trail had 381,400 visits. The MPRB is very concerned about retaining safe and high-quality use and access to these regional trails in this area for all users and from designated access points.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 6.2.1 **Outcome:** Walkers, runners, bicyclists, and other nonmotorized trail users safely and efficiently get from one side of the LRT tracks to the other, year-round and without interruption.
- 6.2.2 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.
- 6.2.3 **Outcome:** All users have adequate access to the trails.

- 6.2.4 **Outcome:** All trail connections are safe and easy to navigate, and space is allowed for future expansion to meet demand.
- 6.2.5 **Outcome:** The Cedar Lake Regional Trail meets commuter bicycle standards of 20 mph design speed.
- 6.2.6 **Outcome:** Communities north of the LRT easily access the Cedar Lake Regional Trail, Cedar Lake, and Cedar Lake Park.



At junction of Kenilworth Regional Trail (center left) and Cedar Lake Regional Trail (top left and bottom right)



At junction, looking west along divided Kenilworth Regional Trail

6.3 Issue: Environmental protection

The MPRB park lands in this area bring significant benefits to park and trail users, support native plant species, and are serve as important wildlife habitat.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 6.3.1 **Outcome:** Park lands retain their natural character.
- 6.3.2 **Outcome:** Wildlife habitat supports local and migratory fauna.



Cedar Lake Park and Cedar Lake Regional Trail - Prairie

7 Intersection with West 21st Street

7.1 Location and Description

The intersection of the Kenilworth Regional Trail and 21st Street is a proposed station location. The station would sit on Hennepin County property, however the west side of the rail line is MPRB property, Cedar Lake Park.

At 21st Street, Cedar Lake has a very popular beach and provides access to a trail network as well as informal foot paths.



7.2 Issue: Park access



At intersection, look west into Cedar Lake Park

This location is the sole access point for Cedar Lake Park and beach. Visitors arrive at this pristine area on foot, by bicycle, and using motorized vehicles, and via 21st Street, the Kenilworth Regional Trail, and in the future the LRT. Given that “Implementation of LRT service and stations along the Segment A alignment would likely result in some land use changes surrounding the stations...” (3.1.5.1), the natural character of this area and clear access must be ensured.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

7.2.1 **Outcome:** Access to Cedar Lake Park at West 21st Street is attractive, natural, and welcoming.

7.2.2 **Outcome:** People on the east side of the corridor safely and easily access park lands on the west side.

7.3 Issue: Safety

With thousands of park and park land users and multiple modes of transport across and along the corridor at this point, safety is of utmost importance. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

7.3.1 **Outcome:** All Cedar Lake Park users have safe and pleasant access to and from the park, regardless of mode of transport.

7.3.2 **Outcome:** Station design *enhances* safety and access for Cedar Lake Park users.

7.4 Issue: Aesthetics, noise

The MPRB is concerned that the anticipated 1,000+ daily LRT boardings (Appendix F, Transit Effects, Figure 2) at

this location would seriously compromise the quality of experience for users of this secluded park area.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

7.4.1 **Outcome:** Cedar Lake Park remains a quiet, tranquil, and natural park destination.

7.4.2 **Outcome:** The area between Burnham Boulevard and 21st Street is naturally beautiful and serene.



Looking SW from 21st Street



Cedar Lake

8 Kenilworth Channel, Bridge

8.1 Location and Description

The proposed alignment of the LRT crosses the Kenilworth Channel, a body of water constructed in 1913 to connect Cedar Lake and Lake of the Isles to form the Minneapolis Chain of Lakes. The Channel has year-round recreational use, from boaters in the summer to skiers and skaters in the winter.

The Channel also provides access for wildlife. The bridge over the Channel for the existing freight tracks and trails is narrow and relatively low to the water.



8.2 Issue: Historic character, aesthetics, tranquility



Kenilworth Channel

The MPRB is concerned about preserving the historic character of the 1913 Kenilworth Channel in its critical role within the Minneapolis Chain of Lakes Regional Park. The channel is part of the Grand Rounds Historic District that is eligible for the National Register of Historic Places.

According to the DEIS (3.6.3.3) ...the bridge design, bank treatment, and aesthetics for the new facility and the potential replacement or modification of the existing pedestrian bridge would have a substantial effect on this historic landscape... In addition, (3.4.5.3) ...Potential long-term effects may occur at the following properties: Kenilworth Lagoon/Channel, Grand Rounds (potential effects of the construction of new bridge structures within the historic district; the design and footprint of these structures may affect the banks of the historic channel and may affect the district's overall feeling and setting).

While the DEIS notes that these issues will be addressed during preliminary engineering, the MPRB is concerned that they receive the most serious attention very early in the process. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 8.2.1 **Outcome:** Support and safety structures are harmonious, beautiful, and both historically and context sensitive.
- 8.2.2 **Outcome:** The Kenilworth Channel retains its natural beauty and serenity and historic character.

8.3 Issue: Connectivity and recreational use

The Kenilworth Channel was central to creating the Minneapolis Chain of Lakes and provides a critical connection between Cedar Lake and Lake of the Isles. Trail access is necessary for people as is year-round channel access for both people and wildlife. It is also a critical link in the City of Lakes Loppet (winter ski race) and City of Lake Tri-Loppet.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 8.3.1 **Outcome:** Users have access to the Kenilworth Regional Trail, Cedar Lake, and Lake of the Isles from both sides of the LRT/Kenilworth Regional Trail.
- 8.3.2 **Outcome:** People and wildlife on both sides of the LRT/Kenilworth Regional Trail have access to and along the undeveloped channel shoreline.
- 8.3.3 **Outcome:** Users have unfettered, year-round passage along the channel (in the water/on the ice) between Lake of the Isles and Cedar Lake.
- 8.3.4 **Outcome:** The historic water connection between Cedar Lake and Lake of the Isles remains a defining characteristic of the Minneapolis Chain of Lakes Regional Park.



© 2008 Steve Kotvis
 From Kenilworth Regional Trail looking along Kenilworth Channel – City of Lakes Tri - Loppet

8.4 Issue: Safety



Cedar Lake Park Association Photo

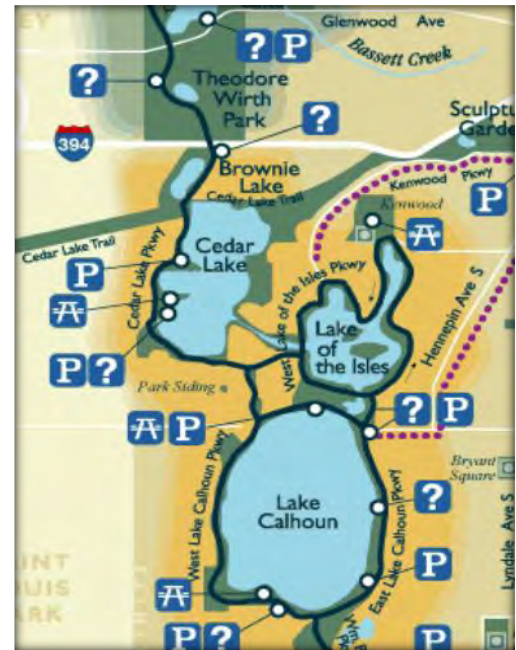
From Kenilworth Regional Trail looking along Kenilworth Channel – City of Lakes Loppet

The MPRB is concerned about protecting the safety of land and water users of the Kenilworth Channel and shoreland.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 8.4.1 **Outcome:** Year-round channel users are safe from falling debris and ice.

9 Cedar Lake Parkway-Grand Rounds



Cedar Lake Section of Grand Rounds

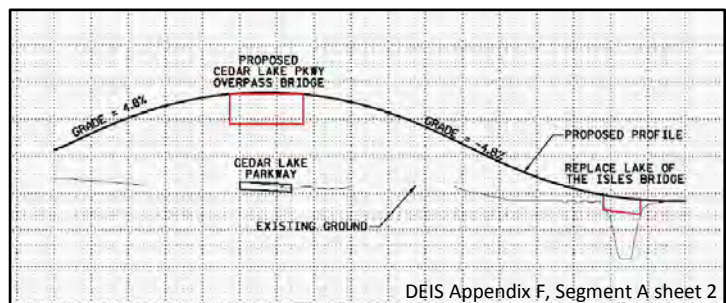
9.1 Location and Description

At this location the LRT intersects with actively used Cedar Lake Parkway, which is an essential section of the [Grand Rounds National Scenic Byway](#) (see Grand Rounds map) and within the Minneapolis Chain of Lakes Regional Park (Cedar Lake Beach, Parkway, and Trail). Directly to the west of this location is Cedar Lake South Beach.

The MPRB is concerned about LRT impacts on the Kenilworth Regional Trail and Chain of Lakes Regional Park users and properties that contribute to the Grand Rounds Historic District. In 2011, according to the Metropolitan Council's annual visit estimates, Kenilworth Regional Trail had approximately 624,400 visits and the Chain of Lakes Regional Park had 5,122,900 visits (Chain of Lakes estimate does *not* include motorized or nonmotorized traffic counts on the parkway). Cedar Lake Parkway, as part of the Grand Rounds Historic District, is considered eligible for the National Register of Historic Places (7.4.1.4 page 7-20).

9.2 Issues: Integrity, flow, and access

The MPRB is concerned that adding LRT into this intersection could result in frequent delays of parkway and trail users along or parallel to Cedar Lake Parkway, and create visual obstructions. The MPRB finds that both of these impacts would significantly diminish the quality of experience for parkway, park, and trail users. Further, such impacts are inconsistent with one of the basic design characteristics of the Grand Rounds: a continuous recreational driving experience.



The MPRB is also concerned that the proposal to elevate the LRT above the parkway at this intersection (see image above) will increase noise and create visual impacts that will significantly diminish the quality of experience for parkway, park, and trail users of a property that is eligible for the National Register of Historic Places.

The anticipated frequency of trains along the corridor will also increase potential conflicts between the trains and users of the trail parallel to Cedar Lake Parkway, thus raising serious safety concerns.

The DEIS makes several references to this issue, including the following:

- 7.4.1.4 Section 4(f) Properties Potentially Used by the Project, page 7-20: Cedar Lake Parkway and the Cedar Lake-Lake of the Isles Channel have been determined eligible for inclusion on the NRHP as part of the Grand Rounds Historic District.
- 3.4.5.3 Cultural Resources, page 3-79: Potential long-term effects may occur at the following properties: Cedar Lake Parkway, Grand Rounds (potential effects of the changes to the intersection of the LRT corridor with the historic parkway, including the LRT overpass bridge, and, under the co-location alternative, the effects of widening the trail/rail corridor; these changes may affect the parkway itself and may alter its setting.)

Below are the critical statements and/or outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

9.2.1 **Statement:** The MPRB conducted a preliminary feasibility study of a grade-separated crossing at this intersection, which revealed that lowering the tracks and trail, and bridging portions of the parkway would allow the train and trail to travel beneath the parkway (see Appendix A for illustrations). The MPRB recommends further exploration of this type of integrated solution that significantly reduces safety hazards, noise impacts, visual impacts, and delays for motorized and nonmotorized vehicles.

9.2.2 **Outcome:** The Grand Rounds (eligible for National Register of Historic Places) fully retains its integrity and intention.

9.2.3 **Outcome:** Motorized and nonmotorized vehicles and pedestrians along the trail parallel to Cedar Lake Parkway experience continuous and safe flow.

9.2.4 **Outcome:** Trail users have direct access to the trails and trail connections that are currently provided at this location.

9.2.5 **Outcome:** Recreational and commuter trail traffic on both the Kenilworth Regional Trail and the trail parallel to Cedar Lake Parkway follows substantially the same route as at present.



On Cedar Lake Parkway-Grand Rounds; at junction looking SW along Kenilworth Regional Trail; Cedar Lake and beach at right

9.2.6 **Outcome:** The view of and from Cedar Lake and surrounding parkland is preserved.

9.2.7 **Outcome:** The parkland around Cedar Lake remains a natural visual buffer between Cedar Lake and the LRT corridor.

9.3 Issue: Safety

Safety of park and trail users is a critical objective for the MPRB. This includes using design to reduce risks from user conflicts or unexpected hazards, and ensuring adequate access to park facilities when the LRT is in operation.

Delays in fire, police, and emergency medical response to park facilities, especially beaches, may result from the high number and frequency of trains that are projected to travel through the corridor. Due to the proximity of South Cedar Lake Beach, timely emergency medical access across this intersection is critical.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 9.3.1 **Outcome:** Fire, police, and emergency medical personnel and equipment can access South Cedar Lake beach and provide response times that meet relevant laws and standards.

9.4 Issue: Noise and air quality

The MPRB is concerned about the noise and air quality impacts of LRT at this intersection due to the high frequency of trains that will cross here. For an at-grade crossing, high levels of track, bell, and whistle noise would significantly diminish the quality of experience in adjacent parkland and along the trails. Noise generated by a flyover condition is also a concern. Frequent traffic delays for train crossings are expected to diminish air quality for park and trail users.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 9.4.1 **Outcome:** LRT and crossing-related noise does not diminish the enjoyment and use of the trails, adjacent park land, and Grand Rounds National Historic Byway.

- 9.4.2 **Outcome:** Air quality at this location meets state and federal standards.



At junction, looking NE along Kenilworth Regional Trail



From Kenilworth Regional Trail looking toward Cedar Lake, Grand Rounds

10 Park Siding Park

10.1 Location and Description

The MPRB owns Park Siding Park, a small neighborhood park, which is immediately adjacent to the LRT corridor and an access point to the Kenilworth Regional Trail. With play equipment as well as formal gardens, it is actively used by children and adults from neighborhoods on both sides of the corridor.

10.2 Issue: Access and safety

Although the DEIS commits to improving the pedestrian and bicycle infrastructure along the alignment and improving the safety of pedestrians and bicyclists through implemented design guidelines (10.5.3.1), the MPRB has particular access and safety concerns at this location. Park visitors, including small children, come from both sides of the corridor as well as from the Kenilworth Regional Trail. This is also a popular bicycle and pedestrian trail ingress and egress point.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.2.1 **Outcome:** All users have formal and safe access to the park from both sides of the LRT.
- 10.2.2 **Outcome:** As an important trail access point, the trail design accommodates a safe ingress and egress.
- 10.2.3 **Outcome:** Trail users have safe access to and from the park.

10.3 Issue: Visual appeal

This small neighborhood park provides play equipment for children and formal gardens for adults. The heavily planted berm between Dean Court and the Kenilworth Regional Trail currently provides a visual screen, but the MPRB is concerned with ensuring that during and after construction there is a strong visual barrier that remains compatible with this important neighborhood park.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.3.1 **Outcome:** The LRT's visual impact does not disrupt park visitors' enjoyment, nor detract from the park's character.

10.4 Issue: Noise

The MPRB is deeply concerned about the impact of LRT noise on Park Siding visitors, especially the very young children who frequent this neighborhood park.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.4.1 **Outcome:** Park users, especially young children, are not subject to LRT noise levels that exceed the noise standards set for Category 1 land uses.



Park, looking SE from Kenilworth Regional Trail access



Kenilworth Regional Trail access, looking toward corridor



A heavily landscaped berm between Dean Court and the corridor provides a safety and visual barrier for Park Siding users

11 Trail Access at Abbott Avenue S (by new West Lake Station)

11.1 Location and Description

This is an actively used trail access to the Kenilworth Regional Trail and Midtown Greenway and is the closest access point to the Chain of Lake Regional Park. West Calhoun Neighborhood Association contributed park-like features to this location including a kiosk, picnic table, bike racks, decorative fencing, and a drinking fountain.

11.2 Issue: Park and trail access

The MPRB is committed to preserving this important trail access, ensuring safe and convenient wayfinding between the trail and nearby Lake Calhoun, and advocating for sufficient bicycle parking for all visitors to the area. The access was originally designed with input from Hennepin County to accommodate future LRT.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 11.2.1 **Outcome:** West Lake station users and all other users have safe and convenient access to and from Lake Calhoun and the Kenilworth Regional Trail.
- 11.2.2 **Outcome:** Wayfinding is provided between the West Lake station and Lake Calhoun and the trails.
- 11.2.3 **Outcome:** Safe and adequate bike parking is provided for recreational and commuter users of the trail and for Lake Calhoun visitors.



12 Northwest Corner of Lake Calhoun Area

12.1 Location and Description

This location within the Minneapolis Chain of Lakes Regional Park is the closest major park land to the proposed West Lake station. It is a primary visitor portal to the Grand Rounds National Scenic Byway. The Calhoun Executive Center parking lot next to Lake Calhoun sits on land that is partially owned by the Minneapolis Park and Recreation Board as part of the Minneapolis Chain of Lakes Regional Park. On weekends and weekday evenings, visitors use this area for parking and to access the regional park and the Grand Rounds.



12.2 Issue: Park and trail access

Millions of annual park visits to this area originate by foot, bicycle, motorized vehicle, and in the future the LRT.

Traffic patterns altered by the addition of a West Lake station will have a direct impact on the park visitor experience and all modes of traffic on Lake Calhoun Parkway and Dean Parkway. The MPRB is concerned that the introduction of the high-volume West Lake station increases the complexity of this area and is committed to ensuring that all visitors have a positive, easy, and safe experience accessing and using the park lands and trails in this area.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 12.2.1 **Statement:** Multimodal traffic patterns in a roughly 1/2-mile radius of the West Lake station must be studied in partnership with the street/trail property owners (Hennepin County, City of Minneapolis, MPRB). Deliverables of the study should include traffic volume and flow projections, and recommendations for 1) long-term street/trail network modifications and 2) short-term network modifications to be implemented with station development.

- 12.2.2 **Outcome:** LRT and West Lake station area design decisions for this area are based on design recommendations from a comprehensive and multimodal (bicycle, pedestrian, transit, vehicle) circulation analysis that addresses impacts to the Grand Rounds parkways and trails.
- 12.2.3 **Outcome:** The design of this area makes clear that it is a “gateway” to the Minneapolis park system.
- 12.2.4 **Outcome:** A safe, free-flowing pedestrian and bicycle route with exceptional wayfinding exists between the LRT station area and Lake Calhoun and adjacent park land.
- 12.2.5 **Outcome:** There is no loss of vehicle parking for park and trail users.
- 12.2.6 **Outcome:** Greenspace at the northwest corner of Lake Calhoun is preserved for park visitors and recreational purposes.

13 Appendix A – Cedar Lake Parkway/ Southwest Transitway

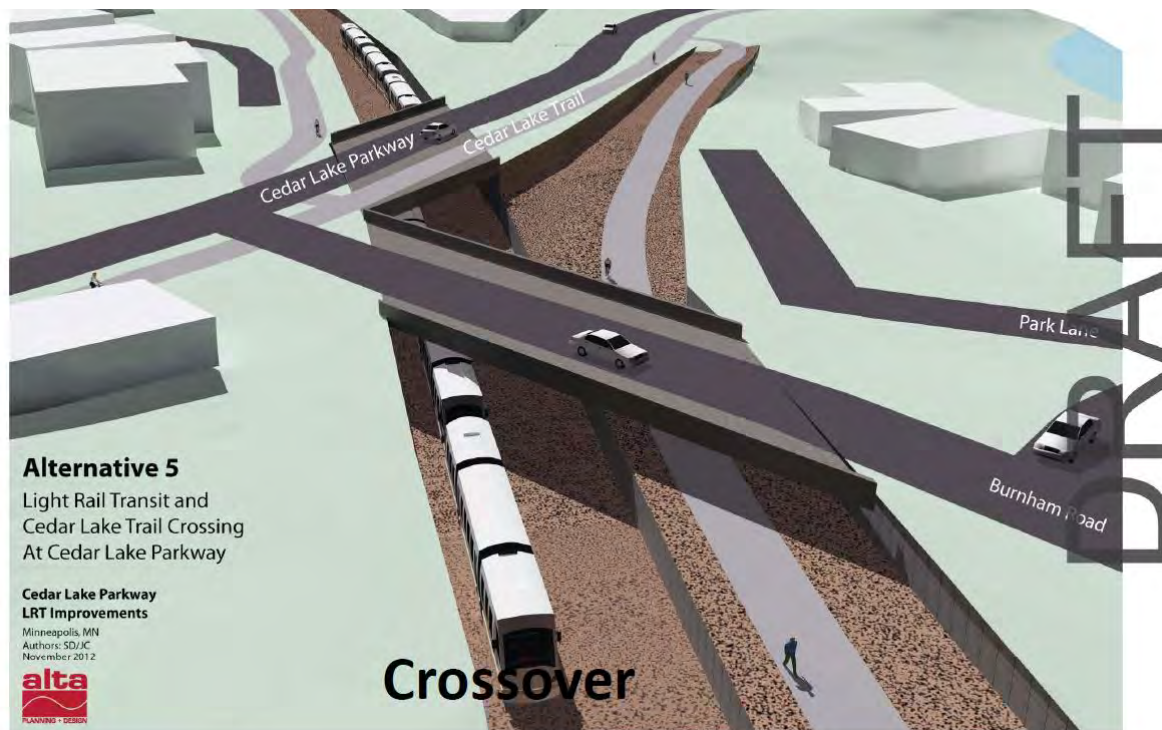
Appendix A is intended to illustrate the concept of lowering the train and trail and bridging Cedar Lake Parkway at the Cedar Lake Parkway/Southwest Transitway intersection. This concept is discussed in Section 9 of this comment letter. The following pages contain a few key images of the analysis conducted on this concept by Steve Durrant of Alta Planning + Design for the MPRB.

Below Grade



Above is a potential cross-section showing elevations for Cedar Lake Parkway (above) and the trail and train.

These are examples of grade separated crossings with trail on east (North version) or west (Crossover version) side of tracks. These are provided to illustrate the concept, not to provide a complete overview of the feasibility study.





"Darby, Valincia"
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12/07/2012 10:24 AM

To <swcorridor@co.hennepin.mn.us>

cc Lindy Nelson <lindy_nelson@ios.doi.gov>

bcc

Subject FTA Southwest Transitway Construction and Operation Light
Rail- DEIS comments

Ms. Simon

DOI correspondence on the subject DEIS is attached. If there are questions please contact this office at (215) 597-5378.

Regards,

Valincia Darby

--

Valincia Darby

Regional Environmental Protection Assistant

Department of the Interior, OEPC

200 Chestnut Street, Rm. 244

Philadelphia, PA 19106

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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



IN REPLY REFER TO:

December 7, 2012

9043.1
ER 12/751

Ms. Marisol Simon
Regional Administrator, Region V
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, Illinois 60606

Dear Ms. Simon:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement and Section 4(f) Evaluation for the Southwest Transitway, Hennepin County, Minnesota. The Department offers the following comments and recommendations for your consideration.

Section 4(f) Evaluation Comments

The Federal Transit Administration (FTA), along with the Hennepin County Regional Railroad Authority (HCRRA) and the Metropolitan Council Regional Transit Board (RTB), have proposed the construction and operation of a 15-mile light rail transit (LRT) line in the Minneapolis/St. Paul region. The draft Section 4(f) Evaluation identified several properties in the project study area eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). The proposed Southwest Transitway connects downtown Minneapolis to the cities of St. Louis Park, Hopkins, Edina, Minnetonka, and Eden Prairie. The intent is to improve access and mobility to the jobs and activity centers in the Minneapolis Central Business District, as well as to the expanding suburban employment centers. The Southwest Transitway was identified by the RTB in the late 1990s as warranting a high-level of transit investment to respond to increasing travel demand in a highly congested area of the region.

The analysis of impacts to eligible 4(f) properties is not entirely straightforward, and it seems much of the decision-making has been postponed for further analysis and consultation. What is understood from the evaluation is that alternatives are anticipated to result in the use of relatively small amounts of parkland; the impacts are estimated to range between 0.002 to 1.12 acres of permanent use depending on the alternative selected. For historic properties, there is the potential for Section 4(f) uses between one and five historic properties/districts, depending on the alternative selected. These uses would consist of affecting historic channels, replacing historic bridges, and placing LRT facilities within eligible or listed sites and a historic district. Consultation on design features may result in a *de minimis* finding under Section 4(f). However,

the historic Regan Brothers Bakery (historic structure) would likely be demolished if a certain facility location is selected and the facility is constructed.

The Section 4(f) Evaluation appears rather preliminary. Therefore, the Department cannot concur with the FTA that there are no feasible or prudent avoidance alternatives to the any of the alternatives presented which result in impacts to Section 4(f) properties. A preferred alternative has not been selected and it would appear that each alternative has some level of impact. It is unclear whether any of the impacts proposed in the evaluation would even be subject to a *de minimis* finding. All discussion of impact mitigation for all Section 4(f) properties are being postponed until more design information is available and consultation with the Minnesota State Historic Preservation Officer (SHPO) and other consulting parties has proceeded. Therefore, the Department cannot concur that all possible planning needed to minimize harm to Section 4(f) resources has been employed. The Department will withhold its final concurrence that there are no feasible or prudent avoidance alternatives and that all possible planning needed to minimize harm to the 4(f) resources has been employed until a preferred alternative is selected and mitigation measures have been determined.

The Department has a continuing interest in working with the FTA to ensure impacts to resources of concern to the Department are adequately addressed. For continued consultation and coordination with the issues concerning historic resources identified as Section 4(f) resources, please contact Regional Environmental Coordinator Nick Chevance, Midwest Regional Office, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, telephone 402-661-1844.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lindy Nelson', with a long horizontal flourish extending to the right.

Lindy Nelson
Regional Environmental Officer,

cc:
MN-SHPO (Barbara.howard@mnhs.org)
Ms. Katie Walker, AICP
Senior Administrative Manager
Hennepin County
Housing, Community Works & Transit
701 Fourth Avenue South, Suite 400
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(swcorridor@co.hennepin.mn.us)



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12/10/2012 01:24 PM

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"Byers, Jack P." <Jack.Byers@minneapolismn.gov>,
"Mogush, Paul R" <Paul.Mogush@minneapolismn.gov>,
bcc

Subject City of Minneapolis DEIS comment submittal

Katie,

Thanks for attending the T and PW Committee meeting last week.

Please accept this e-mail and its attachments as the formal City of Minneapolis comments to the Draft Environmental Impact Statement (DEIS) for the Southwest Corridor LRT project.

Attached are also the links to our comments (includes the PowerPoint presentation):

<http://www.minneapolismn.gov/www/groups/public/@clerk/documents/webcontent/wcms1p-101259.pdf>

Link to the City Council action and committee agenda approving the comments

<http://www.ci.minneapolis.mn.us/meetings/council/WCMS1P-100069>

<http://www.minneapolismn.gov/meetings/tpw/WCMS1P-097352>

Thanks again.

Donald Pflaum, P.E., P.T.O.E
City of Minneapolis Public Works
309 2nd Avenue South – Room 300
Minneapolis, MN 55401-2268
612-673-2129



Request for City Council Committee Action From the Department of Public Works

Date: December 4, 2012

To: Honorable Sandra Colvin Roy, Chair Transportation & Public Works Committee

Subject: **Comments on the Draft Environmental Impact Statement (DEIS) for Southwest Corridor LRT**

Recommendation:

1. Approve the staff recommended comments on the DEIS for the Southwest Corridor LRT project and direct the Public Works Department to submit the comments to Hennepin County.

Previous Directives:

- November 21, 2003; Approve the process of the LRT Corridor study and that the Hennepin County Regional Railroad Authority to pursue the next phase of study as amended; with the understanding that the HCRRA will work with Minneapolis in further evaluating alternative route configurations, which would directly connect Uptown into this regional corridor.
- July 1, 2005; Appoint Council Member Dan Niziolek and Council Member Gary Schiff as Policy Advisory Committee members for the Southwest Corridor Alternatives Analysis process.
- September 5, 2005; Receive and File; SW Corridor study update.
- January 2, 2006; Appoint Council Member Robert Lilligren and Council Member Ralph Remington to serve as Policy Advisory Committee members for the Southwest Corridor.
- October 2, 2009; Receive and File; Report from Hennepin County Housing, Community Works, and Transit.
- January 15, 2010; Approve resolution supporting Locally Preferred Alternative as recommended by the Southwest Transitway Technical Advisory Committee, Policy Advisory Committee and Hennepin County Regional Rail Authority and forwarded to the Metropolitan Council for inclusion in the Regional Transportation Policy Plan.

Prepared by: Donald Pflaum, P.E., P.T.O.E., PW Transportation Planner 673-2129
Beth Elliott, AICP, CPED Principal Planner 673-2442
Paul Mogush, AICP, CPED Principal Planer 673-2074

Approved by:

Steven A. Kotke, P.E., City Engineer, Director of Public Works

Presenters: Katie Walker, Hennepin County Community Works
Donald Pflaum, Transportation Planner 673-2129

Reviews:

Permanent Review Committee (PRC):	Not Applicable
Civil Rights Affirmative Action Plan:	Not Applicable
Policy Review Group (PRG):	Not Applicable

Financial Impact:

None

Community Impact:

Neighborhood Notification: The SW Project Office has created a Citizen Advisory Committee (CAC) to address community needs.

City Goals: Supports City Transportation Goals

Comprehensive Plan: Supports Comprehensive Plan Goals

Zoning Code: NA

Background/Supporting Information

The 15-mile Southwest Corridor (Green Line Extension) is a regional light-rail transit corridor that serves Minneapolis, St. Louis Park, Hopkins, Minnetonka, and Eden Prairie. Once completed, the Southwest Corridor will directly connect to the Hiawatha LRT Corridor (Blue Line), to the Central Corridor Line (Green Line), to the Northstar Commuter Rail Line, and to the Bottineau Corridor Line (Blue Line Extension) in Downtown Minneapolis. The project is expected to serve an estimated 29,660 riders per weekday, is proposed to have 17 stations, and will cost an estimated \$1.25 billion. When completed in 2018, the Southwest Corridor will interline with the Central Corridor LRT, allowing for a one seat ride between Eden Prairie and Downtown St. Paul.

A Draft Environmental Impact Statement (DEIS) documents the potential social, economic, and environmental benefits and impacts of a proposed project or action and proposed measures to mitigate any adverse impacts in compliance with the National Environmental Policy Act (NEPA). The DEIS is released to the public and interested agencies for review and comment. The DEIS and the Final Environmental Impact Statement (FEIS) compose 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. Previously the Southwest Corridor has completed a Feasibility Study, an Alternatives Analysis, and a Scoping Document. The Alternatives Analysis resulted in a Locally Preferred Alternative (LPA), which was approved by the City of Minneapolis on January 15, 2010 and by the Metropolitan Council on May 26, 2010. The Locally Preferred Alternative (LPA) defined the Kenilworth Corridor as the preferred route through Minneapolis. The DEIS was published on October 12th 2012, beginning the 60-day public comment period. Public testimony will be taken at public hearings held on November 13th, 2012 (4:30 PM - Hennepin County Government Center), November 14th, 2012 (6PM – St. Louis Park City Hall), and on November 29th, 2012 (6 PM - Eden Prairie City Hall).

Hennepin County is the responsible governmental unit for the DEIS work for this project. The Metropolitan Council is responsible for the preliminary engineering (PE) and construction phases for this project. The Metropolitan Council will also be responsible for the Final Environmental Impact Statement (FEIS) and for the Record of Decision (ROD). On September 2, 2011 the Federal Transit Administration authorized this project to enter the Preliminary

Engineering phase. This allows for surveying, soil testing, and engineering work to begin; resulting in signed plan sets being developed and bid specifications prepared. Once the PE process has been completed and local funding secured, the Federal Transit Administration will enter into a Full Funding Grant Agreement (FFGA) with the Metropolitan Council and construction will begin. The FFGA is projected to be executed in 2014 with construction taking place between 2014 and 2017.

The DEIS is organized into the following chapters:

- 1) Purpose and Need for the Proposed Action
- 2) Alternatives Considered
- 3) Social Effects
- 4) Environmental Effects
- 5) Economic Effects
- 6) Transportation Effects
- 7) Draft Section (4F) Evaluation
- 8) Financial Analysis
- 9) Indirect Effects and Cumulative Impacts
- 10) Environmental Justice
- 11) Evaluation of Alternatives
- 12) Public Agency Coordination and Comments

Technical appendices A-J supplement the 12 chapters above.

For simplicity, CPED and Public Works have organized comments by major topic. The key comments CPED and Public Works have made on this document include:

- 1) The co-location alternative presented in the DEIS is an unacceptable alternative. Co-location of freight, light rail, and a trail requires considerably more right-of-way than what is available. The City of Minneapolis strongly opposes the taking of any homes along this corridor or the elimination of Burnham Road to allow for the co-location alternative.
- 2) The City of Minneapolis is opposed to the placement of the Operations and Maintenance within the City of Minneapolis.
- 3) All five (5) stations proposed for Minneapolis must be constructed to provide access to both North Minneapolis and to South Minneapolis. Constructing all five (5) stations helps to provide economic benefits to low income and minority residents. Stations must also be constructed in a manner that serves all modes. Vertical circulation at the Van White, Lake Street, and Penn Stations is required as part of the project scope in addition to sidewalk network connections.
- 4) Both the Kenilworth Trail and Cedar Lake Trail need to be replaced as required to standards (trail width, trail thickness, wayfinding, etc.) defined in AASHTO Guidelines, MnDOT Guidelines, and Minneapolis Bicycle Design Guidelines with minimal interruption to trail use during construction.
- 5) The comments provided present technical concerns regarding grade separation at Cedar Lake Road.
- 6) A tunnel at 7th Street will not work with the Interchange Project elevations. Other options must be considered.
- 7) Require that local stormwater policies be adhered to.
- 8) The City does not support park-and-ride facilities in urban areas.
- 9) Traction power substations must be appropriately placed and the visual impact mitigated.
- 10) Utilities and street infrastructure disrupted as part of the project must be replaced at the project's expense.
- 11) Noise and vibration concerns raised by citizens must be mitigated.
- 12) Require that the system use priority signalization and not pre-emption at signalized crossings.
- 13) The City of Minneapolis supports efforts to minimize project impacts on identified historical or cultural resources.

- 14) Station placement at West Lake Street must allow for a future streetcar connection to the Midtown Greenway Corridor.
- 15) Public art must be integrated into station design.
- 16) Mitigation of any road closures or private driveways near the Royalston Station is required.

A final EIS will be prepared that will address impacts at a higher level of detail and will identify mitigation activities. By statute, a municipal consent process will be used to establish the final project scope at 30% completed engineering plans. It is expected that the municipal consent process will take place in mid to late 2014.

Recommended Action

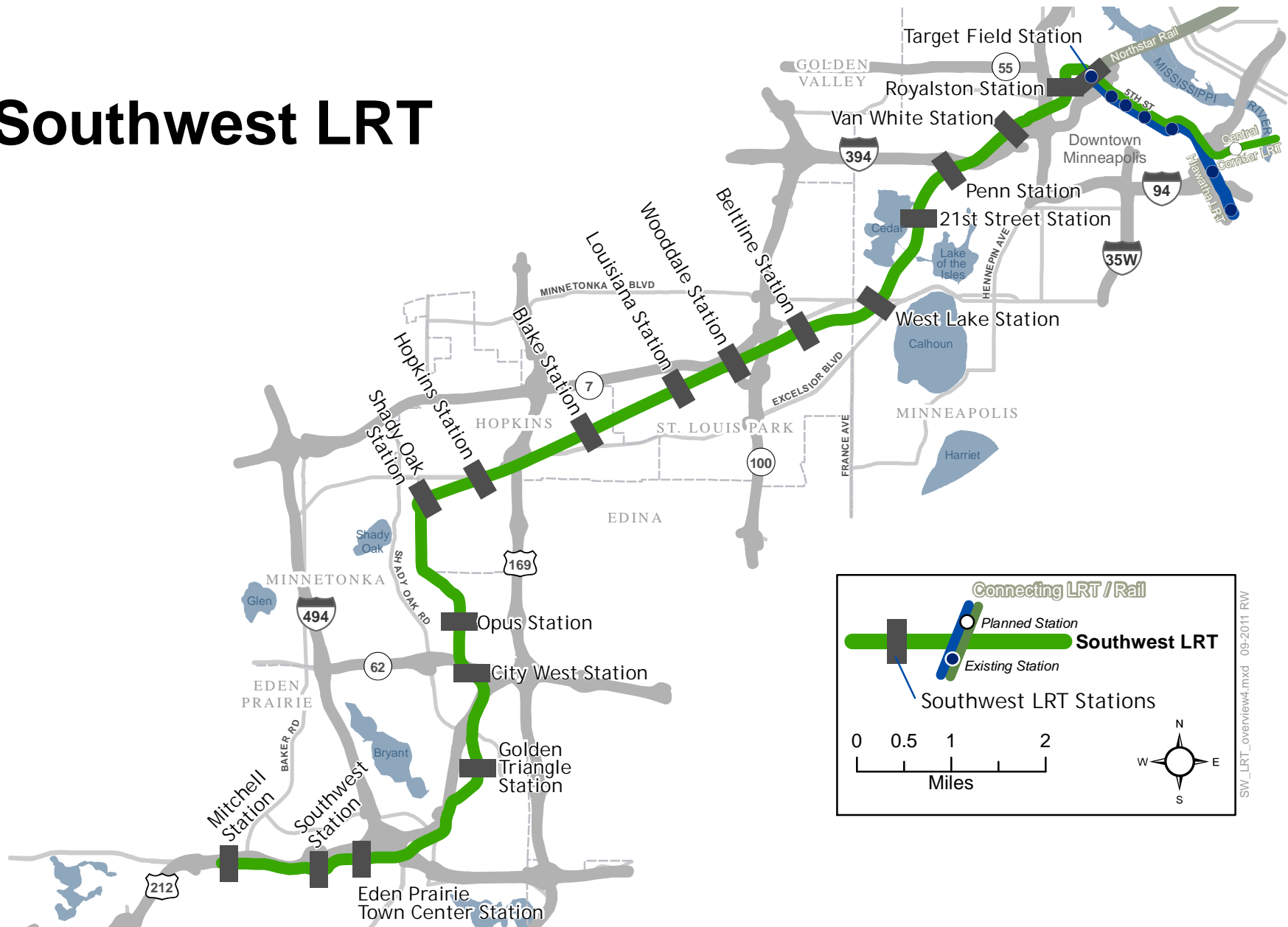
Approve the DEIS comments for the Southwest Corridor LRT Project and direct CPED and the Public Works Department to submit the attached comments to Hennepin County.

Attachment 1 – SW Corridor Map

Attachment 2 – DEIS Comments

DRAFT

Southwest LRT



**Attachment #2 – SW LRT DEIS
City of Minneapolis Comments**

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DRAFT

Overview

Purpose and Need

The Purpose and Need section of the DEIS accurately describes the reasons why the Southwest LRT Corridor is needed. The growing Twin Cities region of nearly 3 million people requires multiple transportation options, especially when the comprehensive plans for each of the cities along the line plan for significant growth within the coming decades. Freeways and minor arterial roadways in this part of the region are experiencing considerable congestion and the resulting delay is costing the region millions of dollars in lost time and productivity. Acquiring additional right-of-way within existing roadway corridors in this region to expand capacity is not sustainable and is not as fiscally prudent as building new transitways in existing rights-of-way such as with the Southwest Corridor. Furthermore, buses cannot adequately address the transit demand in this corridor. Light Rail Transit offers more transit capacity than buses and better promotes economic growth opportunities along the corridor.

The DEIS has concluded that the Locally Preferred Alternative (LPA) will bring significant benefits to the region. The DEIS states that 10,000 new construction jobs will be created for this project. Close to 29,000 total riders (many are reverse commuters) will use the LPA corridor each day once the line has been finished. A 31.5 minute transit ride from the Mitchell Road station to Downtown Minneapolis is very competitive with driving travel times and the line will reduce congestion in the region. The LPA corridor is consistent with local land use plans that will increase density and economic development around stations, increasing the tax base. Finally, the LPA will provide frequent transit service to parts of the Twin Cities that have poor or inconvenient existing service. This project will provide transit opportunities to thousands of people in the region who must currently rely on other modes to get around. In summary, the project will improve mobility by creating a cost efficient travel option, will cut overall vehicle emissions, will improve the quality of life, and will stimulate economic development.

A Draft Environmental Impact Statement (DEIS) documents the potential social, economic, and environmental benefits and impacts of a proposed action and proposed measures to mitigate any adverse impacts in compliance with the National Environmental Policy Act (NEPA). The City of Minneapolis agrees with the conclusion reached in the evaluation of alternatives (Chapter 11 of the DEIS) that the Locally Preferred Alternative (LPA) - Option 3A is the best choice. Based on this analysis, the LPA best meets the Purpose and Need statement, which outlines 6 major goals for the project:

- Goal #1: To improve mobility.
- Goal #2: To provide a cost effective, efficient travel option.
- Goal #3: To protect the environment.
- Goal #4: To preserve and protect the quality of life in the study area and the region.
- Goal #5: To support economic development.
- Goal #6: To support an economically competitive freight rail system.

The overall performance shows the project meeting the goals. The City of Minneapolis agrees with the conclusions reached in the Evaluation of Alternatives (Chapter 11 of the DEIS).

Public Agency Coordination and Comments

The City of Minneapolis commends both Hennepin County and the Metropolitan Council for ensuring that the DEIS is widely available in a number of mediums for the public to review. There are adequate opportunities for the public to comment either in writing or at one of the public hearings being held throughout the corridor.

DRAFT

Alignments Considered and Evaluation of Alternatives

Kenilworth Corridor Alignment – Locally Preferred Alternative (Route 3A)

General Comments:

The City of Minneapolis passed a resolution on January 15th, 2010 supporting the Locally Preferred Alternative, which will traverse the Kenilworth Corridor, providing stops at West Lake Street, 21st Street, Penn Avenue, Van White Boulevard, and Royalston Avenue. Each Minneapolis station is paramount in the project's overall success.

Nicollet Avenue Alignment (Route 3C)

General Comments:

The Nicollet Avenue Alternative (Route 3C) was thoroughly examined as part of the Alternatives Analysis process and was dismissed for a number of reasons highlighted within the DEIS, including high costs, impacts to existing trails, and significant utility impacts. The City of Minneapolis does not support this alternative and has endorsed the Locally Preferred Alternative. Furthermore, the FTA is currently working with the City of Minneapolis to analyze streetcar along the Nicollet Avenue corridor, as part of the Nicollet/Central Alternatives Analysis.

Specific Comments (by section):

Table 11.1-1

While the City of Minneapolis supports the LPA, it should be noted that Alignments 3-C-1 and 3-C-2 are not inconsistent with the City's Comprehensive Plan as noted in this table.

11th/12 Street Alternative (Route 3C-2)

General Comments:

The 11th/12th Street Alternative (Route 3C-2) was examined at the request of a Minneapolis City Council Member. This alternative was thoroughly examined as part of the Alternatives Analysis process and was dismissed for a number of reasons, highlighted within the DEIS. The City of Minneapolis does not support this alternative and has endorsed the Locally Preferred Alternative.

Specific Comments (by section):

Table 11.1-1

While the City of Minneapolis supports the LPA, it should be noted that Alignments 3-C-1 and 3-C-2 are not inconsistent with the City's Comprehensive Plan as noted in this table.

Co-Location of Freight, LRT, and Trails along the Kenilworth Corridor

General Comments:

City of Minneapolis support for the Locally Preferred Alternative is based on the premise that freight rail will be relocated from the Kenilworth Corridor. The City of Minneapolis will not accept the co-location alternative in which freight, LRT, and trails are placed in the same corridor. While the Federal Transit Administration has directed that the co-locating option be examined, it will not be accepted by the City of Minneapolis as part of the municipal consent process. The co-location option will displace dozens of households, will create irreversible damage to the character of the neighborhood, and will destroy high quality parkland that cannot be mitigated.

The Locally Preferred Alternative relocates the existing freight traffic to an existing freight corridor in St. Louis Park. The Locally Preferred Alternative fits within the space envelope that has been preserved by Hennepin County Regional Railroad Authority for the purpose of future transit (per the agreements cited in Appendix J) and does not use park land owned by the Minneapolis Park and Recreation Board that has been established through decades of responsible planning, regional partnerships, and environmental stewardship. In addition, the loss of tree cover in Minneapolis is substantially higher with the co-location option than the Locally Preferred Alternative.

It is important to recognize that all five communities along the Southwest LRT Corridor voted to support the Locally Preferred Alternative, which assumes that freight rail will be relocated and the trails be preserved within the Kenilworth Corridor.

The co-location alternative requires that the existing trails be preserved alongside of freight and light rail. A reconstructed 12-foot trail will not adequately meet the number of trail users currently using the facility. There is currently a 20-foot wide trail in most areas and at times the trail volumes exceed 2,000 people in a given day. The trails must be replaced to at least a 16-foot width to allow for bicycle and pedestrian separation and it is recommended that a 20-foot trail be reconstructed to replace the facility in-kind. Trail design must follow AASHTO guidelines, MnDOT guidelines, and the City of Minneapolis Bicycle Facility Guideline publication.

There are additional financial impacts to the co-location option. If homes in Minneapolis are removed due to the co-location alternative, the tax base will be negatively impacted, affecting both City of Minneapolis and Hennepin County revenues. The City of Minneapolis will be particularly sensitive to any private property needed for the project. Private property taking should be minimized. The co-location option also requires that Burnham Road be reconstructed near Cedar Lake Road as part of the project budget, an expense that is not needed if the Locally Preferred Alternative is pursued.

Specific Comments (by section number):

2.3.3.1

The City of Minneapolis notes that conceptual engineering prepared for Build Alternative 3A-1 (co-location alternative) was provided by the City of St. Louis Park, while the conceptual engineering for all other build alternatives was provided by the project sponsor (Hennepin

County). The City of Minneapolis did not participate in the creation or review of this work and does not support the co-location option.

3.1.2.7

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The relocation of the TC&W freight rail operations from the CP RR (Kenilworth Corridor) to the existing and currently used MN&S and the BNSF would not conflict with the adopted zoning districts of St. Louis Park. Land use for the corridor is categorized in the St. Louis Park’s Comprehensive Plan as ‘railroad’ (RRR). Six separate studies have been completed to determine potential impacts of expanding freight rail service on the MN&S line compared to maintaining freight rail service following the construction of the LRT. These studies concluded the best option for freight rail operations was to relocate the TC&W freight rail operations to the MN&S line.”

3.1.5.1, Page 3-34

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “Implementation of LRT 3A-1 (co-location alternative) in the Kenilworth Corridor could influence a number of land use changes in the area. In order to achieve adequate ROW for placement of the three facilities, up to 57 townhomes would be removed in the area north of the West Lake Station on the west side of the corridor and 3 single-family houses would be removed north of Cedar Lark Parkway along Burnham Road. Additionally, there would be disturbance to Minneapolis Park Board properties on the east side of Cedar Lake in order to create adequate clearance.”

3.2.2.6, Page 3-58

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “With the co-location alternative, the largest disruption in community cohesion would be the acquisition of 60 housing units (see Section 3.3).”

3.2.2.6, Page 3-60

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “Since the MN&S is an active freight rail corridor and the relocation of the TC&W traffic to the MN&S would add only a small increase in freight rail traffic, significant impacts to community cohesion along the MN&S would not be anticipated.”

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “Moving freight rail service to the MN&S line will also remove the at-grade crossing of freight rail and the Southwest LRT Commuter bike trail between Beltline Boulevard and West Lake Street. Removal of this at-grade crossing will improve the safety and connectivity of the Southwest LRT Commuter bike trail.”

3.2.2.7, Page 3-61

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The addition of the Freight Rail Relocation to all of the alternatives above would have a positive impact to adjacent neighborhoods or community cohesion because removal of freight operations along Segment 4 would eliminate a barrier to

community linkages. Associated impacts with relocating the TC&W trains include improved safety by separating the freight rail from the light rail and bicyclists within the HCRRA corridor. LRT 3A-1 (co-location alternative) has the potential for adverse community impacts because of the conflicts that could result from having an excess of activity confined to an area not originally intended for such an intense level of transportation. In this scenario a relatively narrow ROW corridor would be forced to accommodate a freight rail line, LRT, and a multi-use trail creating an even greater barrier to community cohesion in Segment A.”

Table 3.2-2

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The presence of freight rail in Segment 4 and in Segment A may limit land use change to TOD. The acquisition of 57 multi-family housing units for placement of the freight rail line near the West Lake Street Station will diminish TOD potential for the West Lake Station area and is inconsistent with local and regional plans which promote TOD including multi-family residential in proximity to LRT stations.”

3.6.3.3, Pages 3-117,3-118

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The visual impacts to this historic Kenilworth channel would be anticipated to be greater for the LRT 3A-1 (colocation alternative) than LRT 3A (LPA) since the co-location alternative would involve an additional bridge over the channel. This issue will be addressed during Section 106 consultation.”

3.7.3.3

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “With the LRT 3A-1 (co-location) build alternative there are additional safety issues such as maintaining freight train movement in tandem with the LRT and bicycle trail would conflict with the five stations and their operations creating a number of issues e.g., redesign of the stations to ensure safe passage, lengthy freight trains blocking rider’s access to the stations, and general safety considerations such as people crossing the track in undesignated locations.”

5.2.4

The City of Minneapolis agrees with and supports the language in Table 5.2-4 that outlines incompatibility of the co-location option with Minneapolis land use plans and development potential.

6.2.2.2, Page 6-24

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “Also in Segment A with LRT 3A-1 (co-location alternative) only, the ROW needed for this alternative will affect Burnham Road, which is adjacent to the corridor and accessed off of Cedar Lake Parkway. Burnham Road is the main access point for homes fronting on Cedar Lake. It will need to be reconstructed and realigned and its access off of Cedar Lake Parkway would be shifted west. The shift of Burnham Road may also cause the intersection of Cedar Lake Parkway with Burnham Road to be

reconstructed.” The DEIS states that Burnham Road will be shifted to the west requiring significant private property taking, which is not supported by the City of Minneapolis.

7.4.1.5

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The use of Cedar Lake Park, anticipated for the co-location alternative, however, is greater than for LRT 1A and LRT 3A (LPA) and would likely not be avoidable. As such, a finding of de minimis impact would likely not be determined by FTA nor would the Minneapolis Park and Recreation Board likely concur. Therefore, the co-location alternative would constitute a Section 4(f) use of Cedar Lake Park.”

11.2.5

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “The potential adverse environmental impacts associated with LRT 3A-1 (co-location alternative) cause this alternative to fail to rise to the environmentally preferred alternative. They include:

- The necessity to acquire Cedar Lake Park property owned by the Minneapolis Parks and Recreation Board would cause a Section 4(f) impact.
- Failure to provide a direct connection between the CP Bass Lake Spur and the CP MN&S requiring freight trains to navigate the cumbersome and noisy Skunk Hollow switching wye to complete this maneuver.
- High construction related impacts because of the complex construction staging required to rebuild the freight rail tracks.
- Economic development and the potential for transit oriented development will be diminished because of the close proximity of freight rail operations to station locations. Pedestrian safety at the Wooddale, Beltline, and 21st Street LRT Stations would be affected by the need to cross the freight rail tract between the LRT stations and park and ride facilities.
- The economic impact of acquiring over 60 units of primarily high quality, high income multi-family housing by the West Lake Street station makes this alternative inconsistent with state, regional, and local policies and adopted plans.
- Retention of freight rail operations in the Kenilworth Corridor will continue to divide neighborhoods while its removal will allow the Southwest Transitway project to bring the areas together and improve community cohesion.”

The following statement within the DEIS supports the case for the Locally Preferred Alternative and makes the case against co-location. “As evident in the previous chapters of this Draft EIS, LRT 3A-1 (co-location alternative) does not meet the project’s purpose and need and is not a practicable alternative due to the environmental impacts associated with the development of this alternative. Therefore, the LRT 3A-1 (co-location) alternative is not recommended as the environmentally preferred alternative.

“The acquisition of 0.81 acres of Cedar Lake Park needed to co-locate the freight rail tracks that is associated with LRT 3A-1 (co-location alternative) would constitute a Section 4(f) use. Because this Draft EIS has presented other feasible and prudent alternatives to LRT 3A-1 (co-

location alternative), this alternative cannot be recommended as the environmentally preferred alternative.”

Appendix H

The traffic analysis concludes that the co-location option will result in level-of service E and F during the PM peak at Cedar Lake Road/Burnham Road, creating traffic problems that do not exist today.

DRAFT

General Topics (Locally Preferred Alternative)

Design Issues

General Comments:

Below are several design issues that must be addressed in the PE process based on what is shown in the DEIS pertaining to project scope.

- The project must pay for utility relocations due to project construction.
- Stations must be designed with vertical access for pedestrians and bicyclists, particularly at the West Lake Street, Penn Avenue, and Van White Stations. ADA requirements must be met at these stations as part of the project's expense.
- All platforms must have adequate fire and police access.
- Truck access to private industrial sites must be preserved.
- Sidewalks are needed at multiple stations to connect to the existing network of city sidewalks. Substantial investment in pedestrian infrastructure will be required as part of the project budget to make the stations accessible from new and existing development and to facilitate direct bus transfers. In several cases the project will need to provide pedestrian infrastructure outside the immediate station footprint in order to connect to the nearest existing sidewalk systems. Please refer to the Minneapolis Pedestrian Master Plan, Map A-12: Potential Sidewalk Gaps for missing pedestrian infrastructure.

Economic Effects

Specific Comments (by section):

5.2.3

Notification of roadway disruptions to nearby property owners during the construction process may not be adequate. There may be situations where personal interaction is required to find access remedies to properties.

5.2.4

In Table 5.2-4, the text related to LRT 3C-1 and LRT 3C-2 provides inaccurate information related to compatibility with future land use potential. The statement "Implementation of LRT and the accompanying reduction in bus service may reduce TOD development potential which is inconsistent with regional and local plans" draws a false conclusion. While the City of Minneapolis does not endorse Alternatives LRT 3C-1 and 3C-2, City policy supports bus and LRT as complementary transit services that both attract transit-oriented development.

Environmental Impacts/Stormwater Management

General Comments (by topic):

Tree Removal:

Tree Removal must be minimized and mitigated. As mentioned in the co-location comments, there are significantly more trees that will need to be removed under a co-location option than if the Locally Preferred Alternative (LPA) is pursued. The Minneapolis Park and Recreation Board Urban Tree Policy requires that tree loss be mitigated within city limits.

Stormwater:

Mitigation will be required for adverse impacts to City of Minneapolis surface waters, storm drains, storm tunnels, sanitary sewers, and surface drainage, including but not limited to physical conflicts, pollutant loads, surface water levels, increased stormwater runoff, changes to surface drainage impacting public or private properties, or degradation of hydraulics, condition, capacity, or operational/maintenance access. There is a 21-inch storm drain in conflict with the 7th St tunnel which would need to be relocated.

Ground Water/Wells:

An inventory of local wells should be completed and mapped so as to identify distances from the proposed lines. A better analysis of the potential impact on their usability can be conducted and possible solutions identified for mitigation and/or resolution of the potential problem. Activities related to the construction, grading, and operation of the LRT line can affect the groundwater hydrology and potentially impact area wells production capacity. The dewatering for construction as well as to maintain function of the line will also be an impact that appears to be understated in the DEIS. For potable wells additional consideration needs to be made for the wellhead protection areas for community wells and set back requirements for domestic wells from the proposed lines and infrastructure that will be needed for its operation.

Minneapolis Local Regulatory Authority:

Besides those already mentioned:

- Minnesota Wetland Conservation Act Local Governing Unit through Project Review and Approval
- Water Quality through its building plan reviews, Erosion and Sediment Control Ordinance, and Stormwater Management Ordinance.

The City of Minneapolis also has local regulations:

- Requiring permits and approval for afterhours work;
 - Temporary storage of impacted soils on site prior to disposal or reuse;
 - Remediation of contaminated soil and groundwater,
 - Reuse of impacted soils on site;
 - Dewatering and discharge of accumulated storm water or ground water to city sewers; Underground or aboveground tank installation or removal;
 - Well construction and sealing;
 - On-site crushing
- Authority regarding
 - Noise
 - Air pollution

Noise and vibration:

Section 4.7.3 outlines potential long-term noise impacts of LRT operations, based on field measurements of the Hiawatha line and FTA guidance. Sound exposure levels used in the noise analysis may violate MPCA noise rules 7030 for all three noise classifications depending upon its duration. The City of Minneapolis recognizes that some noise is inherent in the regular operation of an LRT line. Engineering of the line must include measures to minimize excessive noise and vibration exposure on nearby properties. The City of Minneapolis expects Metro Transit to implement an operating plan that balances minimized use of bells and horns with a need to ensure safety.

To mitigate noise and vibration the project should use natural features such as trees and hedges rather than noise walls.

The project may need to install vibration measuring devices along the corridor to protect local homes and businesses, especially if sheet pile walls are installed as part of the project. This is particularly important near historic landmarks and cultural resources.

The EIS should include an analysis of the noise impacts (positive and negative) of the bus re-routing which will happen with a new LRT line in place. The City of Minneapolis encourages Metro Transit to use hybrid buses with a goal to convert the entire fleet over time.

Energy and Climate Change:

The expansion of the regional transit network has the potential to have a positive impact on air quality and greenhouse gas emissions by giving travelers more options and mitigating congestion. The following comments pertaining to noise and vibration in addition to Energy and Climate Change are intended to improve the project.

While the City of Minneapolis supports the Locally Preferred Alternative, our partner cities must take care to avoid unintended consequences of extending high-quality transit options into third-ring suburbs. The DEIS makes no mention, and no attempt to quantify, the potential additional greenhouse gas (GHG) emissions from land use patterns that may be changed by an LRT line that emphasizes park and rides as the primary arrival mode at suburban stations. This may actually exacerbate suburban sprawl, making it easy to drive to a suburban park-and-ride from a developing exurban location while not taking advantage of the land around the suburban stations for development that would reduce the need for driving to both work and non-work activities. The City of Minneapolis encourages the cities along the corridor to take full advantage of the development potential around all LRT stations in order to maximize the reduction in GHG emissions. The EIS should quantify and identify mitigation measures for these cumulative impacts.

The DEIS uses a per mile coefficient to calculate energy use, but an average per passenger mile coefficient to calculate GHGs. GHGs are produced by energy production, not by passengers. The DEIS relies on a regional traffic model to estimate vehicle miles and transit miles traveled. These figures should be used as the basis for calculating emissions. The DEIS's per passenger mile figures for greenhouse gas emissions appear to be national averages, which is not an

adequate assumption for application locally, especially when more accurate per-mile and per KWh figures are available. Local electricity coefficients are available from Xcel Energy and the EPA that can provide much more accurate estimates of what a MWh of electricity used by a LRT vehicle produces in terms of GHGs than the national averages the DEIS uses. The carbon intensity of electricity varies widely across the country depending on what fuels are used to produce it, and these regional differences should be taken into account.

The DEIS uses 2009 fuel efficiency assumptions to calculate 2030 emissions. The predicted mpg rating of the average light duty fleet in 2030 (according to EIA) is close to 64% greater than what the DEIS is using (32 mpg under new CAFE rules versus the 19 mpg the DEIS uses). The same methodology (using 2009 fuel efficiencies to estimate 2030 emissions) appears to be used for heavy duty vehicles, buses and trains in the DEIS. Minnesota also has a biofuels mandate both for gasoline and diesel, which lowers the tailpipe impact of motor fuels. For diesel fuel, this percentage is also scheduled to increase in the future if existing legislation holds.

Significant changes are necessary to the section of the DEIS related to greenhouse gas emissions impacts of the alternatives. The document should be updated to use local, accurate, and year-appropriate fuel efficiency and greenhouse gas production coefficients.

Specific Comments (by section):

Sections 4.1 Geology and Groundwater Resources and 4.1.1 Legal and Regulatory Review: Discharge of water from groundwater dewatering in Minneapolis (a) during construction, and/or (b) permanently for deep cuts or tunnels, will also need permitting and approval from the City of Minneapolis, in addition to relevant approvals from the Minnesota DNR, the Minnesota PCA, and/or Metropolitan Council Environmental Services. More information about location, rate and pollutant load of the possible discharge will be required to determine if existing storm drain or sanitary sewer infrastructure has capacity for the discharge. Metering and monitoring may be required as well as payment for the processing of the discharge water.

Sections 4.1.2.1, Potential for Differential Settlement, and 4.1.3.1, Surficial Geology: Discussion should also include consideration of the layers of highly variable urban fill located along some sections in Minneapolis.

Section 4.2, Water Resources and Table 4.2-1, Permitting Agencies, Corresponding Regulatory Responsibilities, and Actions:

- A. Add City of Minneapolis (in Permitting Agency column), Minneapolis Code of Ordinances Title 3 Chapter 52 Erosion and Sediment Control and Drainage (in Regulatory Responsibilities column), and Erosion Control Permit (in Associated Permits/Action column)
- B. Add City of Minneapolis (in Permitting Agency column), Minneapolis Code of Ordinances Title 3 Chapter 54 Stormwater Management (in Regulatory Responsibilities column), and Stormwater Management Plan Approval (in Associated Permits/Action column)

Section 4.2.1.5 Local Cities:

The fifth and sixth sentences appear to be describing Minneapolis requirements but omit reference to Minneapolis, and so appear to be a continuation of City of Eden Prairie requirements.

Therefore please change FROM:

4.2.1.5 “The cities of . . . land alteration occurs. An Erosion and Sediment Control Plan is required for projects that disturb in excess of either 5,000 square feet or 500 cubic yards of earth moved. A Stormwater Management Plan is required for project sites that exceed 1 acre. The SWPPP prepared for the MPCA for the NPDES General Construction Permit, in some cases, provides the information applicable to both of the Minneapolis regulations described in this section above. The cities, however, may have additional requirements. . . .”

Please change TO:

4.2.1.5 “The cities of . . . land alteration occurs. In Minneapolis An Erosion and Sediment Control Plan is required for projects that disturb in excess of either 5,000 square feet or 500 cubic yards of earth moved. A Stormwater Management Plan is required for project sites that exceed 1 acre. The SWPPP prepared for the MPCA for the NPDES General Construction Permit, in some cases, provides the information applicable to both of the Minneapolis regulations described in this section above. The cities, however, may have additional requirements. . . .”

Section 4.2.4 Short-Term Construction Effects:

The fifth sentence currently reads, “Additionally, the project would include construction of permanent BMPs such as stormwater ponds and grit chambers that would reduce pollutant loads as compared to existing conditions.” Stormwater ponds and grit chambers may not provide sufficient pollutant load reduction, and/or in some areas there may not be space for these types of BMPs. Therefore please add to the list of examples, “infiltration trenches or galleries, sand filters, iron-enhanced bioswales”. This list will provide a more realistic toolbox of stormwater treatments.

Appendix H, City of Minneapolis Plans and Studies:

Add the following: Minneapolis Local Surface Water Management Plan, October 2006.

Environmental Justice

General Comments:

It is critical that residents from both North Minneapolis and South Minneapolis benefit from the transit service, mobility, and accessibility benefits of this infrastructure investment. Constructing the proposed stations ensures that people of all income levels and demographic backgrounds will realize the long-term benefits of light rail in their neighborhood. The stations must be designed to realize the surrounding development potential in accordance with City of Minneapolis land use plans and provide for direct access by nearby residents who will walk, bike, or take a local bus to a station.

Figures 10.3-1 to 10.3-10 identify the most impacted station along the Locally Preferred Alternative as the Van White Station. While Chapter 10 primarily focuses on how adverse impacts from implementation of the transit line will be mitigated, it is important for the project to recognize that subtracting project benefits can have just as great an impact on nearby minority and low-income populations. All Minneapolis stations, but particularly the Van White Station, require improved pedestrian access and opportunities to maximize transit-oriented development potential that is consistent with Minneapolis land use plans.

Financial Analysis

General Comments:

The City of Minneapolis understands there are fiscal constraints with this project and will actively work with the project office during the PE process to value engineer the scope of the project. However, it is important that all Minneapolis stations be constructed to realize the full potential of the line. The City of Minneapolis requests that trees and landscaping (not expensive sound walls) be used to mitigate noise and vibration issues in Minneapolis.

Historic Preservation

General Comments:

The City of Minneapolis is a consulting party in the Section 106 Historic Review, has reviewed the research, and supports the conclusions of the analysis of potential effects included in Appendix H. The City will continue to advise on the impacts on historic resources throughout the duration of the Section 106 process as outlined in the Programmatic Agreement.

Indirect Effects and Cumulative Impacts

Specific Comments (by section):

9.6.8.2

Transit-oriented development may increase the need for public services, but it also increases the tax base that is available to pay for those services.

Operations and Maintenance Facility

General Comments:

The City of Minneapolis does not support a second Operations and Maintenance Facility within the boundaries of Minneapolis. Furthermore, the City of Minneapolis does not support the rationale for the four siting criteria and therefore does not support its inclusion in this analysis.

The proposed Minneapolis O and M facility also sits in a low point with regard to elevation. The stormwater pipes do not have enough capacity to take on the stormwater capacity of a building of this size.

Specific Comments (by section):

2.3.3.9

The Operations & Maintenance Facility (OMF) identified four options, one of which is to be located in the North Loop Neighborhood. This location does not fulfill the following criteria used in the site selection process as described in Appendix H:

- Preferred location near one end of line: The North Loop is home to the Interchange, a regional transportation hub that currently connects Hiawatha LRT with the Northstar Commuter Rail. In 2014 it will also connect Central Corridor LRT to St. Paul. Southwest LRT will interline with Central Corridor LRT so consequently the identified Minneapolis OMF would be mid-line and not the end of the line.
- Compatibility with adjacent current and planned land uses: The adopted *North Loop Small Area Plan (2009)* projects large-scale (10+ stories) transit-oriented development for these sites that either has job or residential density in order to support the regional transportation system. This policy has been amended into *The Minneapolis Plan for Sustainable Growth*, the Minneapolis Comprehensive Plan.
- Land zoned industrial and/or light industrial: The site is no longer zoned Industrial. A 2011 rezoning study changed the zoning on the site to the B4S Downtown Services district.
- Public land: The majority of land needed for the proposed site is private and therefore costly acquisitions would be necessary. Additionally, vacating 5th Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy. The City of Minneapolis also has policies in its Comprehensive Plan that highly discourage any street vacations that will compromise the urban street grid. The following policies in *The Minneapolis Plan for Sustainable Growth* apply:
 - 2.1.4 Preserve the existing transportation grid through right-of-way preservation and acquisition.
 - 2.2.6 Encourage reconnection of the traditional street grid where possible, to increase connectivity for all travel modes and strengthen neighborhood character.

3.1.5.2

The Operations & Maintenance Facility (OMF) Minneapolis 4 identified to be located in the North Loop Neighborhood is not consistent with existing land uses, future land use direction, or existing zoning. While the current uses are primarily industrial, it is inaccurate to identify adjacent land uses as compatible since the site is only separated by the 3rd/4th Street Viaduct from high-intensity residential. The 5th Street corridor where this OMF is proposed is also identified for large-scale (10+ stories) transit-oriented development in the *North Loop Small Area Plan*, which has been amended into the City's Comprehensive Plan. These properties are now zoned B4S Downtown Services district which is expressly incompatible with an Operations &

Maintenance Facility. Therefore, the comment that “the facility would be permitted by the city zoning ordinance” is inaccurate.

3.1.8

It is not correct that OMF Minneapolis 4 is compatible with zoning and planned development as summarized in Table 3.1-7.

3.2.2.7

The City of Minneapolis disagrees with the statement on page 3-61: “In general, construction of the OMF would not result in the creation of a barrier between neighborhoods, and the operation of the facility at the locations identified is not anticipated to adversely impact community cohesion.” The location of the OMF on 5th Street North would be situated directly in the middle of the North Loop neighborhood along a corridor that is projected to have intense TOD potential due to its proximity to the Interchange regional transportation hub. The 5th Street North corridor is projected to completely transition away from underutilized industrial properties to a mix of residential, office, and commercial uses of 10+ stories. While the proposed OMF site is currently between Metro Transit properties and the 3rd/4th Street Viaduct, it is just on the other side of the Viaduct from dense multi-family housing. The City has already received development proposals for properties along 5th Street North, which is emblematic of an untapped market potential that matches the City’s future land use policy guidance. Therefore, an OMF at this location would indeed act as a barrier to expansion of TOD opportunities in the North Loop neighborhood as well as impact community cohesion by prohibiting implementation of a plan that the community created.

3.2.2.8

Page 3-64 - The location of the OMF on 5th Street North would be situated directly in the middle of the North Loop neighborhood along a corridor that is projected to have intense TOD potential due to its proximity to the Interchange regional transportation hub. The 5th Street Corridor is projected to completely transition away from underutilized industrial properties to a mix of residential, office, and commercial uses of 10+ stories. While the proposed OMF site is currently between Metro Transit properties and the 3rd/4th Street Viaduct, it is just on the other side of the Viaduct from dense multi-family housing. The City has already received development proposals for properties along 5th Street North, which is emblematic of an untapped market potential that matches the City’s future land use policy guidance. Therefore, an OMF at this location would indeed impede TOD opportunities in the North Loop Neighborhood as well as impact community cohesion by prohibiting implementation of a plan they created. Additionally, vacating 5th Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy.

3.3.3.5

In Table 3.3-3, 27 properties would be impacted for OMF Minneapolis 4, the majority of which are private property with potential for intense TOD development. The 5th Street corridor where this OMF is proposed is identified for large-scale (10+ stories) transit-oriented development in the *North Loop Small Area Plan*, which has been amended into the City’s Comprehensive Plan.

Not only would these 27 properties grow the city's tax base, their potential for increasing the number of housing units and jobs in the area would help support the regional transportation system.

3.4.5.5

Related to potential impact on cultural resources, the OMF Minneapolis 4 site is within a ¼ mile of the Nationally-registered and locally-designated Warehouse Historic District. Further analysis needs to be conducted to evaluate potential visual impacts of the OMF on the integrity of the Warehouse Historic District.

3.6.3.3

Page 3-122 – For clarification purposes, the OMF Minneapolis 4 site is located in the center of the North Loop Neighborhood which is bounded by the Mississippi River, Hennepin Avenue, I-394, and I-94. While the residential parts of the neighborhood are north of this site, the *North Loop Small Area Plan* adopted policy recommends a wide range and mix of uses throughout the entire neighborhood. Not only would a new track system leading to the OMF and the vacation of 5th Street North seriously impede an already-challenging circulation system, the visual impact of the OMF could be great as the area transitions to transit-oriented development.

3.6.5.3

The mitigation measures identified on page 3-124 are inadequate to minimize the effects of OMF Minneapolis 4 on existing residents and workers but on future populations as well. This is already a dense urban environment that will continue to grow in height and density. Surrounding the facility “with façade treatments and landscaping” is insufficient to minimize the visual impacts from tall buildings.

6.2.2.5

On page 6-46 related to the OMF Minneapolis 4 site, vacating 5th Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy. The following policies in *The Minneapolis Plan for Sustainable Growth* further support these comments:

2.1.4 Preserve the existing transportation grid through right-of-way preservation and acquisition.

2.2.6 Encourage reconnection of the traditional street grid where possible, to increase connectivity for all travel modes and strengthen neighborhood character.

Appendix H

The Operations & Maintenance Facility (OMF) Minneapolis option identified to be located in the North Loop Neighborhood does not fulfill criteria used in the site selection process as described in Appendix H:

- Preferred location near one end of line: The North Loop is home to the Interchange, a regional transportation hub that currently connects Hiawatha LRT with the Northstar Commuter Rail. In 2014 it will connect Central Corridor LRT to St. Paul. Southwest LRT will interline with Central Corridor LRT so consequently the identified OMF is mid-line.

- Compatibility with adjacent current and planned land uses: The adopted *North Loop Small Area Plan (2009)* projects large-scale (10+ stories) transit-oriented development for these sites that either has job or residential density in order to support the regional transportation system. This policy has been amended into *The Minneapolis Plan for Sustainable Growth*, the Minneapolis Comprehensive Plan.
- Land zoned industrial and/or light industrial: The site is no longer zoned Industrial. A 2011 rezoning study changed the zoning on the site to the B4S Downtown Services district.
- Public land: The majority of land needed for the proposed site is private and therefore costly acquisitions would be necessary. Additionally, vacating 5th Street would have a dramatic impact on an already-compromised circulation system within this area. The *North Loop Small Area Plan* recommends opening up access throughout the neighborhood, so any street vacations would be inconsistent with this policy. The City of Minneapolis also has policies in its Comprehensive Plan that highly discourage any street vacations that will compromise the urban street grid. The following policies in *The Minneapolis Plan for Sustainable Growth* apply:
 - 2.1.4 Preserve the existing transportation grid through right-of-way preservation and acquisition.
 - 2.2.6 Encourage reconnection of the traditional street grid where possible, to increase connectivity for all travel modes and strengthen neighborhood character.

Park and Ride

General Comments:

The City of Minneapolis does not support park and ride lots within its boundaries because they hinder transit-oriented development at key locations adjacent to transit stations. Park and ride facilities also encourage driving, when a primary purpose of LRT is to promote alternatives to driving. The ridership generated by the relatively few number of parking spaces proposed in the DEIS can be replaced or surpassed by a combination of new development, high-quality pedestrian connections to the station, and enhanced feeder bus service.

Specific Comments (by section/page):

Tables 2.3-3, 2.3-4, and 2.3-7 (station descriptions for LRT 1A, LRT 3A, and LRT 3A-1), as well as the conceptual engineering drawings in Appendix F, show surface park-and-ride lots at the West Lake Street, 21st Street, and Penn Avenue stations. Tables 2.3-5 and 2.3-6 (station descriptions for LRT 3C and LRT 3C-2) indicate that the West Lake Street station would have a surface park-and-ride lot. The City of Minneapolis does not support park and ride lots within its boundaries because they hinder transit-oriented development at key locations adjacent to transit stations. Park and ride facilities also encourage driving, when a primary purpose of LRT is to promote alternatives to driving. The ridership generated by the relatively few number of parking spaces proposed in the DEIS can be replaced or surpassed by a combination of new development, high-quality pedestrian connections to the station, and enhanced feeder bus service.

Tables 2.3-9, 2.3-10, and 2.3-11 summarize the major changes that would be made to the bus operating plan for each build alternative. These proposed changes, while preliminary, will be very important for integrating existing transit service with LRT and for expanding the LRT customer base beyond each transit station walkshed. The City of Minneapolis strongly supports seamless transfers between LRT and high-frequency buses. Establishment of these connecting routes, along with high-quality pedestrian connections, will make the provision of park-and-ride facilities at Minneapolis LRT stations unnecessary.

Table 3.1-3 (Compatibility of Build Alternatives with Local and Regional Comprehensive Plans and Studies) indicates that with the exception of LRT 3A-1 (co-location), the build alternatives are consistent with *The Minneapolis Plan for Sustainable Growth*, the comprehensive plan for the City of Minneapolis. We concur that this major transit investment is both consistent with and furthers implementation of the policies of the comprehensive plan. However, one major element of the build alternatives is inconsistent with the plan. The proposed park and ride lots in Minneapolis will hinder transit-oriented development at key locations adjacent to transit stations, a key policy goal of the comprehensive plan (Policy 1.13 - Support high density development near transit stations in ways that encourage transit use and contribute to interesting and vibrant places). Park and ride facilities also encourage driving, when a primary purpose of LRT is to promote alternatives to driving, another key policy of the comprehensive plan (Policy 2.4: Make transit a more attractive option for both new and existing riders). The ridership generated by the relatively few number of parking spaces proposed in the DEIS can be replaced or surpassed by a combination of new development, high-quality pedestrian connections to the station, and enhanced feeder bus service.

Page 3-34 discusses long-term land-use change on Segment A in Minneapolis. The land use change that Minneapolis anticipates is new high-density transit-oriented development. The potential for this land use change is greatly diminished, however, if key development sites adjacent to stations are used as park-and-ride lots as proposed in the build alternatives.

Section 3.6.3.3 discusses the long-term effects of the build alternatives on visual quality and aesthetics. The proposed park-and-ride lots at the West Lake Street, 21st Street, and Penn Avenue stations will have a negative impact on visual quality and aesthetics. Surface parking lots do not fit aesthetically into the urban environment that Minneapolis is working to achieve. Where parking is required or provided in new development, the City's zoning code requires the visual impact to be minimized by prohibiting parking between the building and the street. The park-and-ride lots proposed in the build alternatives would not be hidden by buildings. Rather, they would be in prominent and highly-visible locations at the station entrances.

Section 4.11 (Energy & Climate Change) indicates that the build alternatives could have a positive impact on greenhouse gas emissions, based on a substitution of LRT passenger miles for vehicle miles traveled (VMT). It is important to note that LRT passengers beginning their trip by driving to a park-and-ride are still contributing to regional VMT and are not realizing the full potential benefit of high-quality transit. Providing high-frequency connecting bus routes, effective pedestrian connections, and substituting the park-and-rides with ridership-generating

development are all solutions that will better achieve the goal of reducing greenhouse gas emissions.

Section 5.2.4 discusses the potential for land development around the proposed stations in each of the build alternatives. The introduction of new transit-oriented development (TOD) that provides opportunities for living and working near transit, as well as increasing the tax base, is an important outcome of this major investment in light rail. Surface park-and-ride lots adjacent to the proposed stations preclude TOD in the most strategic locations available in the station areas. The City of Minneapolis does not support park-and-ride lots within its boundaries.

Section 6.2.2.4 (Transit Station Access) lists the proposed stations that would provide parking. In Minneapolis, the stations that would include surface park-and-ride lots under the build alternatives are West Lake Street, 21st Street, and Penn Avenue. The City of Minneapolis does not support park and ride lots within its boundaries because they hinder transit-oriented development at key locations adjacent to transit stations. Park and ride facilities also encourage driving, when a primary purpose of LRT is to promote alternatives to driving. The ridership generated by the relatively few number of parking spaces proposed in the DEIS can be replaced or surpassed by a combination of new development, high-quality pedestrian connections to the station, and enhanced feeder bus service.

Parks and Open Space (Section 4F Evaluation)

General Comments:

As mentioned elsewhere, loss of parkland and open space as a result of the co-location alternative cannot be mitigated because of the enormous space envelope required to fit light rail, freight, and trails. The co-location option requires the loss of a significant amount of mature trees on existing parkland and adjacent to it. The Locally Preferred Alternative requires a footprint that will fit within the existing space envelope that was preserved by Hennepin County Regional Railroad for the purpose of transit development. This option will result in minimal tree loss and will not dramatically change the amount of green space currently in place.

Public Art

General Comments:

The City of Minneapolis requests the inclusion of public art at or above the level implemented through the Central Corridor. Central Corridor allocated 3.5% of the overall project to public art design and installation. The SW Corridor should meet or exceed this amount.

Social Effects

General Comment:

The City of Minneapolis believes great value will come from the Southwest Transitway to the city and the region. The LRT line will provide opportunities for employees to reach jobs in Downtown and other employment centers by a more sustainable means than a single-occupancy vehicle, provide access to commercial destinations for shopping, and open up access to recreational amenities such as the Minneapolis Grand Rounds. Use of the LRT and the accompanying five Minneapolis stations will also aid in eliminating minority and income disparities if done in such a way as to improve access for pedestrian, bicycles, and bus riders to the stations and support development goals. It is critical that the other stations throughout the line are also focused on these goals in order to maximize reverse-commuting and the overall benefit of the transit investment.

Specific Comments (by topic):

3.3

The City of Minneapolis disagrees with the following statement: “No Build Alternative land uses would be a continuation of the existing suburban development pattern and there would likely not be concentrations of transit oriented development TOD in the vicinity of the station areas”. This is not an accurate statement for the Minneapolis stations with the exception of the 21st Street Station Area. The rest of the Minneapolis stations are in locations either with existing high-density land uses or where the market would perform for other reasons. The introduction of the Southwest Transitway at the Minneapolis station locations will be a boost to market demand and result in more of the type and density of transit oriented development that Minneapolis already expects in an urban environment.

3.1.2

By using Met Council future land use data for Figure 3.1-2, it provides an inaccurate interpretation of the future land use map from Met Council-approved *The Minneapolis Plan for Sustainable Growth*. For example, Figure 3.1-2 identifies the future land use surrounding the Van White Station as Industrial while the City of Minneapolis Future Land Use for this area is Mixed Use. The difference in these two categories is that an area designated for future Industrial does not translate well to transit oriented development while a direction for Mixed Use development does.

3.1.2.4

- There are a couple of inaccurate statements in the zoning analysis on pages 3-16 and 3-17. The reference to the Minneapolis downtown zoning districts as being consistent with other Minneapolis zoning districts as it relates to land use intensity is inaccurate. The downtown zoning districts do not restrict density or height. Additionally, there is no mention of current zoning around the Van White Station despite the inclusion of this analysis for all other stations. These sections should be amended with that information.
- The Shoreland Overlay District applies to properties within 1,000 feet of a lake or pond, not one-half mile as stated in the DEIS.

3.1.2.5

Page 3-18 describes the Nicollet Mall Overlay District. The statement “The implementation of the fixed guideway rail service would require the removal and alternation of the sidewalk area for the guideway and proposed stations, and would displace the bus service to adjacent streets and, therefore would not be compatible in this area” is inaccurate and should be deleted. The Nicollet Mall Overlay District, like all zoning, regulates the function and design of buildings and therefore does not identify with the specific type of adjacent transportation service.

3.1.3

A summary of the *North Loop Small Area Plan* is missing from Table 3.1-2. This plan was approved by the City of Minneapolis in 2010 and subsequently amended into *The Minneapolis Plan for Sustainable Growth*. It is, however, identified on page 15 of Appendix H. This is the primary policy document for the Royalston Station.

3.1.3.1

The *North Loop Small Area Plan* needs to be added to Table 3.1-3. Additionally, a checkmark should be in the box for the *Downtown East/North Loop Master Plan* (correct name) and LRT 3C-2 since the alignment meets up with the Interchange which was envisioned in this plan.

Table 3.1-7

While the City of Minneapolis supports the Locally Preferred Alternative and is not advocating for any other alignment, it should be noted that Alternative 3C-1 is not inconsistent with the Access Minneapolis Plan as shown in the table. Access Minneapolis was developed prior to the selection of an LPA and shows both the 3A and 3C alignments.

3.1.5.2

The illustrations on page 3-36 should be identified as EXISTING land use so as to clarify that it is not FUTURE land use.

Traction Power Substations

General Comments:

The City of Minneapolis recognizes that traction power substations are a necessary piece of infrastructure for an LRT line. Through the preliminary engineering process, the City will work with the Southwest LRT Project Office to ensure that impacts to development potential as well as visual and aesthetic quality are avoided or mitigated. Traction Power Substations need to be located to optimize development and public access.

Specific Comments (by section/page):

2.3.3.6 (Traction Power Substations):

The DEIS indicates that the proposed traction power substation sites shown in Appendix F “were located to minimize impacts to the surrounding properties” and that more precise locations will be selected during preliminary engineering with an effort to “meet a balance of safety, reliability, cost, and operational efficiency needs.” Improper siting of traction power substations can have a much greater impact than is stated in this language. Often the most convenient location is on

publicly-owned land near a station. This is land that would be best utilized for transit-oriented development. The criteria for traction power substation site selection should include language about avoiding impacts to future development.

Section 3.6.3.3 discusses the long-term effects of the build alternatives on visual quality and aesthetics. Traction power substations have a significant impact on visual quality and aesthetics that must be appropriately mitigated. Traction power substations are large boxes that look very similar to shipping containers, and without a high level of screening are not aesthetically compatible with any urban or suburban context. In Minneapolis, traction power substations should be screened with high-quality fencing and landscaping consistent with the urban design policies of *The Minneapolis Plan for Sustainable Growth* (Chapter 10) and the Site Plan Review chapter of the Minneapolis Zoning Code (Title 20, Chapter 530).

Section 3.6.5.3 discusses mitigation of social effects for the build alternatives. Regarding traction power substations, the text reads:

“Efforts would be made to select sites that are on underutilized land, such as surface parking lots. Where TPSS placement would impact sensitive receptors, such as residential neighborhoods suitable screening or other mitigation measures will be developed.”

Surface parking lots are often prime future development sites and should not be considered high priorities for traction power substation locations. While we applaud the language regarding suitable screening where TPSS placement would impact sensitive receptors, the City of Minneapolis will insist that all traction power substations are appropriately screened, regardless of location.

Section 5.2.4 discusses the potential for land development around the proposed stations in each of the build alternatives. The introduction of new transit-oriented development (TOD) that provides opportunities for living and working near transit, as well as increasing the tax base, is an important outcome of this major investment in light rail. If located improperly, traction power substations have the potential to reduce or even eliminate future development potential on key sites near the proposed stations. The criterion for traction power substation site selection should include language about avoiding impacts to future development.

Transportation Effects: Traffic Impacts

General Comments:

The LRT system will need to look at priority signalization and not pre-emption at at-grade signalized crossings within the city.

Specific Comments (by section):

6.3.2.1

The second paragraph on page 6-55 identifies that 173 Glenwood Avenue would have 11 parking spaces affected by Segment A. This needs to be clarified as to why this would occur.

6.3.2.4

The City of Minneapolis strongly supports the statement at the top of page 6-60: “In most station areas, it is likely that new sidewalks and trails would be constructed to accommodate and encourage pedestrian activity.” Sidewalks are needed at multiple stations to connect to the existing network of city sidewalks. Substantial investment in pedestrian infrastructure will be required as part of the project budget to make the stations accessible from new and existing development and to facilitate direct bus transfers. In several cases the project will need to provide pedestrian infrastructure outside the immediate station footprint in order to connect to the nearest existing sidewalk systems. Please refer to the Minneapolis Pedestrian Master Plan,

Map A-12: Potential Sidewalk Gaps for missing pedestrian infrastructure.

Transportation Effects: Grade Separation

General Comments:

The DEIS Locally Preferred Alternative shows that Cedar Lake Parkway is designed to include a bridge structure over it. This bridge needs to be evaluated further to determine if it is warranted. Some of the impacts that must be addressed in the PE process include visual quality, viewsheds, traffic level-of-service, traffic/rail crossing safety, trail connections, cost/value, groundwater constraints, ADA requirements, trail safety, and available right-of-way. Delaying up to 11 vehicles for a period of up to 30 seconds may be a reasonable expectation in a built urban environment. Coordination with the Minneapolis Park and Recreation Board will be needed, as this crossing is part of the Grand Rounds, which is a National Scenic Byway. A seamless trail connection will be needed between the Kenilworth Trail and Cedar Lake Parkway at this location.

The alignment of the Locally Preferred Alternative arrives at The Interchange via a tunnel under 7th Street North. Since the time that Hennepin County completed the conceptual engineering in 2009 for this DEIS, they subsequently learned through the Interchange design process that a tunnel under 7th Street is not feasible. The project office must evaluate the other options of an at-grade crossing or a grade-separated crossing via a bridge based on intersection level-of-service, visual quality, access for all modes of transportation, and development potential. This analysis should be accomplished with consideration of a Bottineau Corridor alignment.

Specific Comments (by section):

6.2.2.3, Page 6-39

The following statement within the DEIS pertains to the delay associated with an at-grade crossing at Cedar Lake Road. As mentioned above, additional study is required as part of the PE process to determine the need and design for a structure at this location. “Specifically, the maximum queue associated with the LRT passing through the Cedar Lake Parkway crossing would be 11 vehicles with a duration of about 30 seconds.”

Transportation Effects: Trails

General Comments:

Both the Kenilworth Trail and the Cedar Lake Trail were constructed with federal transportation dollars and are built to accommodate large numbers of bicyclists and pedestrians. Over 2,000 bicyclists and pedestrians have been counted in one day on the Kenilworth Trail where it intersects with the Midtown Greenway. Please consult the 2011 City of Minneapolis Bicyclist and Pedestrian Count Report for more information on trail counts:

<http://www.minneapolismn.gov/bicycles/data/WCMS1P-088370>

Both trails were built with separated paths to ensure maximum safety for both bicyclists and pedestrians and both trails were built to a 7-ton roadway standard so that maintenance vehicles would not damage the trail surface. The City of Minneapolis owns both trails and the Minneapolis Park and Recreation Board maintains both facilities.

The DEIS clearly shows that the Kenilworth Trail and portions of the Cedar Lake Trail must be reconstructed as part of the Locally Preferred Alternative. The City of Minneapolis will require that the trails be replaced in the rail corridor. At a minimum the trail will need to have 3 inches of asphalt over 6 inches of aggregate sub-base. The trail must be built with bicycle and pedestrian separation, which requires a trail surface of at least 16 feet (5 feet in each direction for bicycles and 6 feet for pedestrians). Where space is available, the project should construct the trails to 20 feet in width to allow for 7 feet in each direction for the bicycles, which is what exists today in most segments of both trails. Trail design must conform to AASHTO guidelines, MUTCD requirements, and must be designed to reflect guidance in the Minneapolis Bicycle Design Guidelines, which can be found on the City of Minneapolis website.

Because of the high volume of trail users and the limited number of trail access points along the corridor, the project must construct a temporary trail in close proximity to the existing trails. Advanced warnings and notifications to trail users will also be necessary. Temporary traffic control for bicyclists and pedestrians should make every practical effort to match the level of accommodation of the existing trails and sidewalks prior to the work. When developing temporary traffic control and detours, the project office should consult the Minneapolis Public Works Traffic and Parking Division to ensure adequate treatments.

Bicycle and pedestrian safety must be considered where at-grade track crossings are planned. Crossing arms and tactile indicators should be evaluated at these crossings. Trail and sidewalks should cross LRT tracks at a perpendicular angle, per AASHTO and MUTCD guidance.

Station design also needs to minimize conflicts between bicycles and pedestrians, especially at station platforms. Bicycle and pedestrian access between station platforms and adjacent trails should be seamless. During construction temporary sidewalks and trails will be required. Advance notice of closures and detours (using signage and media alerts) will need to be provided

Specific Comments (by section/page):

6.3.2.4, Page 6-58

“According to LRT design standards developed by Metro Transit, traffic signals with pedestrian indicators would be required at all locations where trails cross the Build Alternatives”. An engineering study should be conducted to evaluate pedestrian and bicycle safety. Section 8C.13 (Pedestrian and Bicycle Signals and Crossings at LRT Grade Crossings) and Section 8D (Pathway Grade Crossings) of the Manual on Uniform Traffic Control Devices (MUTCD) should be included in the engineering study. Crossing arms for pedestrians and bicyclists should be considered in the same manner in which they are considered for motor vehicles. In addition tactile indicators or other guidance should be included on pedestrian paths wherever they cross tracks, in order to contribute to the safety of pedestrians who are visually impaired.

DRAFT

Station Issues (Locally Preferred Alternative)

Royalston Avenue Station

General Comments:

The Royalston station area is characterized as transitional mixed use, in recognition of the likely longevity of existing industrial uses. The station's downtown adjacency makes it an attractive location for transition to downtown-style residential or commercial development, which are likely to co-exist with industrial uses for some time. This station area may display the most diverse definition of mixed use of all the station areas, likely serving industrial, residential, commercial, retail, entertainment and social service interests for a long time in the future. Expansion of the existing Minneapolis Farmers Market, located one block west of the station platform, is also seen as a near-term priority.

The station area is significantly confined by adjacent highway and roadway infrastructure; as such, it is envisioned as a walk-up station meant to serve local destinations and bus feeder connections. As a walk-up station, it will have no transit parking and will instead prioritize intermodal connections, particularly for the reverse-commute to southern employment destinations. Royalston will also be designed to accommodate crush loads and act as an alternate destination station for Target Field, making connectivity to the Field a priority as well.

In the Royalston Station area, one of the most prominent destinations will be the Minneapolis Farmers Market. Access from the station platform to the Farmers Market will require pedestrians to walk multiple blocks out of the way which will be a major impediment. A pedestrian and bicycle path should be provided by the Project going east-west along the block between Border Avenue and Royalston Avenue in order to provide this direct connection.

Wherever LRT tracks cross a street at a non-perpendicular angle, an evaluation of the potential for bicycle wheels to be caught in the tracks should be conducted. Mitigation steps should be taken if crashes are likely to occur.

The alignment of the Locally Preferred Alternative arrives at The Interchange via a tunnel under 7th Street North. Please see the Grade Separation section for specific comments on this topic.

Bus connections to the Royalston Station must be as direct as possible. If the most direct bus transfer location is at the corner of 5th Avenue North and 7th Street North, it is imperative for pedestrians to be able to walk safely along 5th Avenue North and Royalston to the station platform. There are currently missing sidewalks on Royalston Avenue and non-ADA compliant sidewalks on 5th Avenue N.

Specific Comments (by page):

3.1.7

There are likely to be properties along Royalston Avenue that will have access temporarily eliminated during construction because they only have one driveway option. This particular issue should be studied early and in detail in order to adequately mitigate operation of these businesses. It will not be satisfactory to simply supply “appropriate notification and signage” – there may be situations where personal interaction is required to find access remedies.

3.2.2.6

On page 3-58 related to this statement: “The implementation of LRT service would not sever roadway or driveway connections or remove the existing multiple-use trail adjacent to the proposed guideway alignment of Segment A.” At least two properties at the Royalston Station will be negatively impacted by the location of the alignment and platform. These are industrial businesses that require direct and frequent access from semi-trucks and the sites contain only one access onto Royalston Avenue. The long-term effects to doing business on these sites should be a priority to study early in the Preliminary Engineering process in order to determine if acquisition is necessary. Alignment along the Royalston Avenue right-of-way – center, west side, and east side – should be evaluated for effects on adjacent businesses weighed against keeping two-way traffic circulation.

3.3.5

At least two properties at the Royalston Station will be negatively impacted by the location of the alignment and platform. These are industrial businesses that require direct and frequent access from semi-trucks and the sites contain only one access onto Royalston Avenue. The long-term effects to doing business on these sites should be a priority to study early in the Preliminary Engineering process in order to determine if acquisition is necessary. Alignment along the Royalston Avenue right-of-way – center, west side, and east side – should be evaluated for effects on adjacent businesses weighed against keeping two-way traffic circulation.

5.2.2

At least two properties at the Royalston Station will be negatively impacted by the location of the alignment and platform. These are industrial businesses that require direct and frequent access from semi-trucks and the sites contain only one access onto Royalston Avenue. The long-term effects to doing business on these sites should be a priority to study early in the Preliminary Engineering process in order to determine if acquisition is necessary. Alignment along the Royalston Avenue right-of-way – center, west side, and east side – should be evaluated for effects on adjacent businesses weighed against keeping two-way traffic circulation.

5.2.4

In Table 5.2-4, under the LPA’s Environmental Metrics, access on Royalston Avenue could be affected. At least two properties at the Royalston Station will be negatively impacted by the location of the alignment and platform. These are industrial businesses that require direct and frequent access from semi-trucks and the sites contain only one access onto Royalston Avenue. The long-term effects to doing business on these sites should be a priority to study early in the Preliminary Engineering process in order to determine if acquisition is necessary. Alignment along the Royalston Avenue right-of-way – center, west side, and east side – should be evaluated for effects on adjacent businesses weighed against keeping two-way traffic circulation.

5.2.4

In Table 5.2-4, under the LRT 3C-2's Environmental Metrics, it identifies 20 on-street parking spaces for potential elimination on Royalston Avenue. Since this alignment is the same as the LPA, this information should be used consistently throughout this table.

5.2.5.2

At least two properties at the Royalston Station will be negatively impacted by the location of the alignment and platform. These are industrial businesses that require direct and frequent access from semi-trucks and the sites contain only one access onto Royalston Avenue. The long-term effects to doing business on these sites should be a priority to study early in the Preliminary Engineering process in order to determine if acquisition is necessary. Alignment along the Royalston Avenue right-of-way – center, west side, and east side – should be evaluated for effects on adjacent businesses weighed against keeping two-way traffic circulation.

6.2.2.2

On the bottom of page 6-20, the closing of Holden Avenue in Minneapolis is discussed. The Royalston Station area has great potential for development as outlined in the *North Loop Small Area Plan* but faces challenges to realizing the potential with connectivity barriers, namely the lack of a consistent street grid. Holden Avenue is a critical circulation piece in this challenging street system and therefore its closing needs to be mitigated by extending Border Avenue to Glenwood as consistent with the *North Loop Small Area Plan*.

6.2.2.2

On the top of page 6-35, the closing of the Royalston and 5th Avenue North intersection is identified as a necessity for Segment C-2. Since this alignment is the same as the LPA in this area and the closing of this intersection has not been mentioned under the LPA, this inconsistency needs to be cleared up. The City would have serious concerns with closing this intersection. The Royalston Station area has great potential for development as outlined in the *North Loop Small Area Plan* but faces challenges to realizing the potential with connectivity barriers, namely the lack of a consistent street grid.

6.2.2.6

Royalston Avenue properties should be included in the list of properties with affected access in the Build alternative.

6.3.1.3

There seems to be a mistake in the sentence describing industrial areas. The Royalston area is mistakenly being attributed to Eden Prairie rather than Minneapolis. 6.3.2.3 – On the top of page 6-58, truck access and movement issues are discussed. It should be recognized in this section that industrial businesses on Royalston Avenue could have minimized access for trucks due to turning movement constraints.

Van White Boulevard Station

General Comments:

Van White Station's role as a transitional mixed-use station was established in the Bassett Creek Valley Master Plan and reflects both neighborhood desires and the goals of the site's designated master developer. Plans support the use of this station area as a mixed-use area while recognizing the complex development issues (office absorption, uncertain redevelopment time frame of several key parcels, engineering challenges for the Linden Yards parcel) that the City of Minneapolis, residents, and master developer are working to overcome. Van White Memorial Boulevard – currently under construction - will provide the only direct access to the station area.

It is absolutely necessary that this station have a vertical circulation component to the station design. This connection is critical to achieving the projected ridership for this station. ADA requirements will need to be met to achieve the connection between the new Van White bridge deck sidewalk to the station platform below. The platform will also need to be designed to allow easy access for emergency vehicles.

Specific Comments (by section):

2.3.3.10

In Table 2.3-9, no improvements are recommended to local bus service at the Van White Station. As with all LRT stations, the existing bus system needs to be examined to maximize connections to the station, which may result in new bus routes as a necessary option. Van White Boulevard should allow for transfers from the bus system to the Southwest Transitway.

Appendix F Conceptual Engineering Drawings:

LRT stations should be visible, safe, and well connected to trails and pedestrian improvements. Additional work is needed in the PE process to define the final location of the Cedar Lake Trail, since it will need to be relocated in places.

Penn Avenue Station

General Comments:

The proposed Penn Avenue station is in a valley adjacent to Cedar Lake. It will provide residents of the adjacent neighborhoods with access to the region's emerging LRT system and will serve as a destination station for people from all over the region accessing the park and trail system. The station will also support development along Madeira Avenue and Wayzata Boulevard.

At the Kenilworth Trail/Cedar Lake Trail junction, delay for bicyclists should be considered and a decision about grade separation should be based on safety, risk, and cost.

Specific Comments (by section):

Section 6.2.2.4 briefly discusses the modes of transportation that LRT riders will use to access the proposed stations. Penn Avenue is listed as a station that will be accessed via walking, biking, driving, or transferring from a local bus route. The City's objection to park-and-rides is documented elsewhere in this letter. The City views this station as primarily a walk-up and bus transfer station, in addition to biking. Data from the 2010 Census indicate that 3,576 people live

within one-half mile of the proposed station. The station is also near existing and potential future employment along Wayzata Boulevard and Madeira Avenue (neither of which have sidewalks). Without adequate pedestrian infrastructure, most or all of the station area residents and workers will be cut off from accessing the station by any means other than the circuitous pedestrian and bicycle bridge to the Cedar Lake Trail, which does not provide convenient or even feasible access to much of the station area. Pedestrian connections that address barriers to pedestrian access should be constructed as part of the LRT project. Specific solutions to addressing these barriers will be developed during the Transitional Station Area Action Plan and Preliminary Engineering processes, but will at minimum include a high-quality pedestrian bridge with ADA-compliant vertical circulation connecting Wayzata Boulevard pedestrians to the station platform, as well as a connection from the platform to Kenwood Parkway.

Penn Avenue, Wayzata Boulevard, and Kenwood Parkway are planned bicycle routes in the Minneapolis Bicycle Master Plan. Therefore, the previously-mentioned need for vertical pedestrian circulation from Wayzata Boulevard and Kenwood Parkway should also include bicycle design features.

Tables 2.3-9, 2.3-10, and 2.3-11 summarize the major changes that would be made to the bus operating plan for each build alternative. These tables do not include any proposed changes to bus routes in the Penn Avenue station area. The Penn Avenue station should be served by high-frequency bus routes that expand the LRT customer base beyond the station area walkshed. These transfers will only work if necessary pedestrian infrastructure is provided as part of the LRT project.

Buses serving this station from the north will need to drop off and pick up passengers on Wayzata Boulevard. The design of any bus stops or drop-off areas should minimize impacts to future development and allow for safe and inviting pedestrian movement through the area.

2.3.3.10 – In Table 2.3-9, no improvements are recommended to local bus service at the Penn Station. As with all LRT stations, the existing bus system needs to be examined to maximize connections to the station, which may result in new bus routes as a necessary option.

21st Street Station

General Comments:

The proposed 21st Street station is situated in the midst of a very stable, predominantly single-family neighborhood and adjacent to East Cedar Beach on Cedar Lake. The City of Minneapolis views the 21st Street station as a low-impact, walk-up station. It will provide residents of the adjacent neighborhoods with access to the region's emerging LRT system and will serve as a destination station for people from all over the region accessing the park and trail system.

The preliminary engineering process should consider the interaction between bicycles on the north-south Kenilworth Trail, north-south Southwest LRT trains, and east-west 21st Street motor vehicles. The "City of Minneapolis Guidelines for the Installation of Traffic Control Devices at Intersections of At-Grade Shared-Use Path and Public Streets" is a helpful resource that the

preliminary engineering team should consult for design guidance. Preliminary engineering should also consider that the City's bike plan includes a bicycle route on 21st Street leading to and from the 21st Street Station.

Specific Comments (by section):

Section 6.2.2.4 briefly discusses the modes of transportation that LRT riders will use to access the proposed stations. 21st Street is listed as a station that will be accessed via walking, biking, driving, or transferring from a local bus route. The City's objection to park-and-rides is documented elsewhere in this letter. The City views this station as primarily a walk-up and bus transfer station, in addition to biking. Data from the 2010 Census indicate that 2,217 people live within one-half mile of the proposed station. The station also serves the park system, including the adjacent East Cedar Beach. The combination of origins and destinations within easy walking distance of the 21st Street station makes a park-and-ride lot unnecessary.

West Lake Station

General Comments:

The West Lake Street station area exhibits an urban mix of uses, with retail, residential and office already existing within the immediate station area. As such, the City considers this station a true, mixed-use urban village. Existing uses are expected to continue, with the potential for densification in response to transit service.

Specific Comments (by section):

Connection to Midtown streetcar:

Section 6.1.2.2 discusses the role of the Southwest Transitway in the context of the existing and planned regional transit system. One of the major planned transitway projects in Minneapolis and the region that is identified in the Metropolitan Council's Transportation Policy Plan is the Midtown Corridor Transitway. The Metropolitan Council is in the process of evaluating future transit options in the Midtown corridor, including streetcar in the Midtown Greenway that would terminate at the West Lake Street station. The success of a future streetcar in the Midtown Greenway relies on a seamless connection between the two lines, both for transferring passengers as well as streetcar vehicles that may need to use Southwest LRT tracks for access to an operations and maintenance facility. All of this needs to be accomplished without negative impacts to the multi-use trail. Toward that end, Metro Transit has developed a series of conceptual layouts intended to inform the preliminary engineering process on these issues. Those layouts confirm that it is feasible to accomplish the connection with either a shared or parallel platform for streetcar as long as the platform is located southwest of the Lake Street bridge. The Southwest LRT Project Office should ensure during preliminary engineering that this connection can be made and use the work completed by Metro Transit to aid in this effort.

Tables 2.3-9, 2.3-10, and 2.3-11 summarize the major changes that would be made to the bus operating plan for each build alternative. These proposed changes, while preliminary, will be very important for integrating existing transit service with LRT and for expanding the LRT

customer base beyond West Lake Street station walkshed. The City of Minneapolis strongly supports seamless transfers between LRT and high-frequency buses. These transfers will only work if necessary pedestrian infrastructure is provided as part of the LRT project. At the West Lake Street Station, routes 17, 21, 25, and 53 will need to stop on the Lake Street bridge over the LRT/trail corridor in order to provide convenient and visible access to the LRT platform. This requires modifications to the Lake Street bridge as well as the provision of stairs and elevators on both sides of the bridge. This condition would be similar to the West Bank LRT station and the 46th Street and 35W BRT station. Some buses may also need to access the station via Abbott Avenue South and West 31st Street. The design of any bus stops or drop-off areas on the street adjacent to the platform should minimize impacts to future development and allow for safe and inviting pedestrian movement through the area.

Section 6.2.2.4 briefly discusses the modes of transportation that LRT riders will use to access the proposed stations. West Lake Street is listed as a station that will be accessed via walking, biking, driving, or transferring from a local bus route. The City's objection to park-and-rides is documented elsewhere in this letter. The City views this station as primarily a walk-up and bus transfer station, in addition to biking. Data from the 2010 Census indicate that 6,796 people live within one-half mile of the proposed station, the highest among the stations in the Locally Preferred Alternative. Without adequate pedestrian infrastructure, many station area residents and workers will be cut off from accessing the station on foot, reducing the tremendous ridership potential of this station. The two most substantial barriers to pedestrian access are the LRT tracks themselves (and the freight tracks, should they remain) and the lack of sidewalks on adjacent streets (St Louis Avenue, Abbott Avenue, 31st Street, and Chowen Avenue). In addition the Lake Street Bridge has an insufficient pedestrian zone of 7-9 feet (the minimum pedestrian zone dimensions on bridges width from the "City of Minneapolis Design Guidelines for Streets and Sidewalks" is 10'). Pedestrian connections that address these barriers to pedestrian access must be addressed as part of the LRT project.

The Lake Street Bridge is in the Minneapolis Bicycle Master Plan for bike lanes. There is currently bicycle access to the Calhoun Village shopping center on the north side of Lake Street (via the Midtown Greenway) but not to the Whole Foods and nearby shops on the south side of Lake Street (via Abbott Avenue).

Required Action

Mitigation

While the LPA meets project goals, a number of mitigation measures must be completed as part of the project scope to improve mobility for all modes, to protect the environment, and to support economic development. For example:

- The impacts of siting a second Operations & Maintenance Facility in the City of Minneapolis cannot be mitigated.
- Existing trails that are impacted by the project must be mitigated as part of the project's expense, replaced in the same design quality and width as the existing design.
- Noise and vibration created from trains must be mitigated. Suggested methods of mitigation are included in this document.
- Stormwater must be managed as the result of new impervious surface created by the project. Suggested methods of mitigation are included in this document.
- Disrupted utilities and street/sidewalk infrastructure must be relocated/reconstructed at the project's expense.
- The visual impact of traction power substations and signal bungalows must be mitigated with proper placement and appropriate screening.
- If Holden Street is closed near the Royalston Station, Border Avenue must be extended to Glenwood Avenue to mitigate the street closure.
- If contaminated sites are discovered as part of project excavation, cleanup must be funded and remediated by the project.
- Truck and vehicle access to local businesses must be maintained adjacent to the track alignment. If an access point is disrupted, a new or improved access point is needed to mitigate the loss. Catenary poles must be placed in a manner that allows for truck turns in and out of businesses.
- Stations must provide sidewalk connections to existing sidewalk networks within ½ mile of the station per FTA guidance. Vertical circulation needs to be installed at the West Lake Street Station, the Penn Avenue Station, and at the Van White Station to ensure ADA compliance.
- All five (5) proposed stations in Minneapolis are important to the success of the line.

The following option cannot be mitigated and therefore should be dismissed as part of the Final Environmental Impact Statement:

- The co-location option can no longer be pursued because of the negative 4F impacts to regional parks and open space managed by the Minneapolis Park and Recreation Board.



"Hingeveld, Andy"
<AHingeveld@co.scott.mn.us>
>

12/11/2012 03:39 PM

To "swcorridor@co.hennepin.mn.us"
<swcorridor@co.hennepin.mn.us>
cc "Freese, Lisa" <LFreese@co.scott.mn.us>
bcc

Subject: Scott County Comment Letter

Please consider the attached comments from the Scott County Board of Commissioners regarding the Southwest Transitway Draft EIS. A hard copy of the letter will be delivered as well.

Thank you,

Andy Hingeveld, AICP
Senior Planner | Scott County Community Services
(952) 496-8839 | ahingeveld@co.scott.mn.us



SCOTT COUNTY BOARD OF COMMISSIONERS

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TOM WOLF, DISTRICT 2
DAVID MENDEN, DISTRICT 3
BARBARA MARSCHALL, DISTRICT 4
JON ULRICH, DISTRICT 5

December 11, 2012

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Re: Southwest Transitway Draft Environmental Impact Statement

On behalf of the Scott County Board of Commissioners, I am hereby submitting the following comments regarding the Draft Environmental Impact Statement (DEIS) for the Southwest Transitway Light Rail Transit (LRT) line. Scott County supports the continued analysis and implementation of the Locally Preferred Alternative (LPA) to provide a regionally significant transit corridor for residents and businesses in the southwest metropolitan area.

The 2030 Transportation Policy Plan has a 2030 goal of doubling transit ridership and a 2020 goal of a 50% ridership increase. The implementation of the Southwest Transitway will provide a significant investment to improve ridership opportunities and make transit more attractive for travelers in the southwest metropolitan area. However, we find that there are some additional opportunities not discussed in the DEIS that could further increase ridership and meet regional transportation policies of providing an integrated transit network. We are concerned that LRT connections to express bus service along TH 169 have not been fully addressed. In addition, the document does not discuss any future connections or impacts to the potential Dan Patch commuter corridor between Minneapolis and Northfield. Please consider the following comments regarding these concerns.

- The DEIS does not reference any recommended connections of the Southwest Transitway LRT to TH 169, an Express Bus Corridor with Transit Advantages. There are five proposed stations in the vicinity of TH 169 (Golden Triangle, City West, Opus, Downtown Hopkins, Blake Road) that could be accessed by express bus service along TH 169. All five LRT stations are planned to include Park and Ride facilities. However the DEIS does not identify which stations, if any, would be utilized for express bus service connections along TH 169.

- The DEIS also does not mention any transit advantage opportunities along TH 169 to provide quick access for express buses to and from any of the LRT stations. LRT station locations and arterial road connections (such as TH 169) should be evaluated to determine efficient routing of transit service from the TH 169 corridor.
- The proposed relocation of freight rail traffic to the CP MN & S and BNSF Wayzata rail lines would redirect freight rail traffic to the Dan Patch Line commuter corridor. The Dan Patch Line is a 40-mile corridor from downtown Minneapolis in Hennepin County, through the west and south suburbs of Hennepin, Scott and Dakota Counties, to the city of Northfield in northern Rice County. In the 1990s the Dan Patch Commuter Rail project was identified in the Twin Cities Metropolitan Commuter Rail System Plan as a Tier 1 Corridor. The DEIS does not evaluate the impacts of an increase in freight rail activity on any future commuter rail opportunities along the CP MN & S and BNSF Wayzata rail lines (Dan Patch Line). The DEIS also does not evaluate opportunities for intermodal connectivity between the Southwest LRT Transitway and the future commuter rail corridor near the planned Louisiana and Wooddale LRT stations.

Providing efficient connections between transit services will ensure that the overall regional transit system functions as a seamless and user-friendly regional network (2030 TPP Strategy 13a). This will help the region achieve its goals in increasing transit ridership. We thank you for your attention to these comments, and welcome your interest in addressing the concerns of Scott County.

Sincerely,



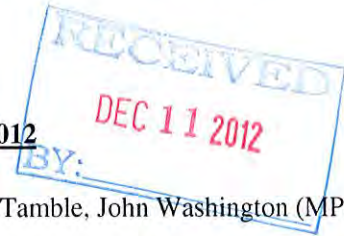
Tom Wolf
Chair, Scott County Board of Commissioners



MINNEAPOLIS
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Minneapolis
Park & Recreation Board



JOINT COMMISSION

Administrative Break-out Group Summary – 11-19-2012

Community Members: Cassie Guzman, Steve Hirsch, Egan Haugesag, Dean Campbell

Staff members: Ginger Cannon, Aaron Flanders, Paul Jaeger (MPRB), Clyde Kane, Jack Tamble, John Washington (MPS)

- I. Administrative (Bylaws, Agreements, Finances, Scheduling) Staff Recommendations For Joint Commission Meeting
 - a. Scheduling – No recommendations.
 - b. Finance – Establish a common rental fee structure for similar fields e.g. Washburn and Parade synthetic turf fields.
 - c. Agreements/Bylaws – Establish a joint task force in order to simplify current shared use agreements. Personnel should include, at a minimum, legal, facility staff, and program users as needed. Community members will be invited into the process once specific site scheduling is involved e.g. Windom community contributed Neighborhood Revitalization Program funds to gain access for specific community needs.

Proposed Administrative Action Steps

Phase 1: For spring 2013

- 1. Physical Inventory of parks & schools owned facilities and amenities
 - a. Master facility lists (what’s being offered currently; MPRB & MPS)
 - b. Community access to the master facility lists
- 2. Outline facilities and amenities by what is owned by both agencies with definitions of each facility and amenity
 - a. Layout an inventory for community to receive feedback on how the agencies should operate their facilities and amenities
- 3. Capture sports participation data & analyze this data in order to jointly coordinate and offer correct youth sports offerings according to historical perspective over time
- 4. Create public survey regarding two systems of two agencies
 - a. K-8th grade –MPRB
 - b. 8th grade and higher – MPS

Phase 2:

- 1. Streamline technology between both agencies; reservations, programs, etc. are under seamless system for both agencies (BOARD ACTION REQUIRED)
- 2. Create a field hierarchy and have premier fields used exclusively for games, playoffs, and tournaments – needs further discussion
- 3. Streamline MPS student ID cards with MPRB (BOARD ACTION REQUIRED)
- 4. Clarify joint agreements & ensure that they are equitable to all parties – needs further discussion
- 5. Create one “Minneapolis” system (combine MPRB & MPS K-12th grade) – needs further discussion

Potential barriers to enhance progress:

- 1. MPS and MPRB support separate technologies for youth sports registration and administration that do not house the same data on facilities, are not technologically compatible, and require extensive training to operate on an administrative level.
- 2. How are the neighborhood sports councils or for-profit youth sports groups that heavily utilize MPS/MPRB facilities being included in this discussion of one “Minneapolis” system?

Minneapolis Park and Recreation Board Southwest Transitway DEIS Comment Letter

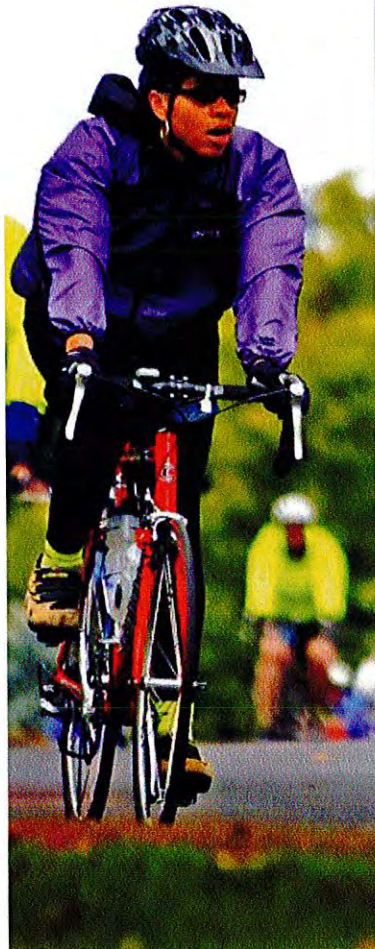
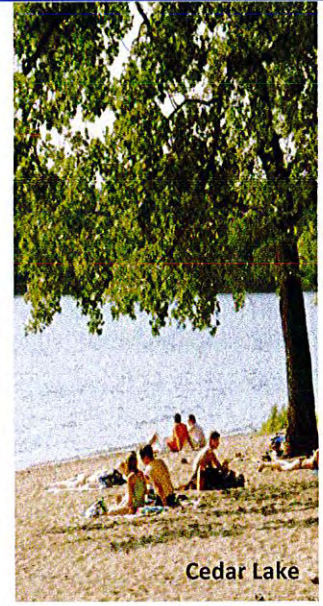


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Transmittal Letter

December 5, 2012



**Minneapolis
Park & Recreation Board**

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Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Re: Minneapolis Park and Recreation Board Comments on the Southwest Transitway Draft Environmental Impact Statement

Dear Project Manager:

The Minneapolis Park and Recreation Board (MPRB) welcomes this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Southwest Transitway (LRT) project. In collaboration with its appointed Community Advisory Committee, the MPRB prepared the following comment letter for Segment A of the Locally Preferred Alignment (LPA) for the project. It contains the MPRB's desired outcomes for the project relative to historical, cultural, visual, recreational, social, environmental, and safety impacts on the park and recreation resources it owns, manages, or maintains.

In 1883, the Minneapolis Park and Recreation Board was created by an act of the Minnesota State Legislature and a vote of Minneapolis residents. It serves as an independently elected, semi-autonomous body responsible for governing, maintaining, and developing the Minneapolis park system. The MPRB's mission is as follows:

The MPRB shall permanently preserve, protect, maintain, improve, and enhance its natural resources, park land, and recreational opportunities for current and future generations.

The MPRB exists to provide places and recreation opportunities for all people to gather, celebrate, contemplate, and engage in activities that promote health, well-being, community, and the environment.

The MPRB is also one of 10 regional park implementing agencies. It works with the Metropolitan Council to acquire and develop regional parks and trails to protect natural resources and provide outdoor recreation for public enjoyment in the Metropolitan Area. In 2011, based on Metropolitan Council annual use estimates, the regional parks and trails that are impacted by this alignment received over 6 million visits.

President
John Erwin

Vice President
Liz Wielinski

Commissioners
Brad Bourn
Bob Fine

Carol A. Kummer
Jon C. Olson
Anita Tabb
Scott Vreeland
M. Annie Young

Superintendent
Jayne Miller

Secretary to the Board
Michael P. Schmidt



The MPRB is obligated to ensure that parks and trails and the interests of current and future park and trail users are not substantially impaired by the project. It is within this context that the MPRB makes the comments contained in this letter. There are several overarching messages the MPRB wishes to express regarding the Southwest Transitway:

- MPRB, in general, is supportive of light-rail transit.
- Current development and public use of the corridor within Minneapolis has an open and natural character that includes portions of the Minneapolis Chain of Lakes Regional Park, Grand Rounds National Scenic Byway, Kenilworth Regional Trail, and Cedar Lake Regional Trail. Park design in this area focuses on serenity, habitat restoration, minimal development, and passive recreation. To retain the area's character the water table levels and quality, cultural landscapes, habitat, and open space must be protected and preserved.
- Several topics of keen interest to the MPRB, including noise, vibration, and visual impacts, are noted in the DEIS as requiring further analysis during preliminary engineering. To monitor and protect the parks, trails, and recreation areas of this project that are within its jurisdiction, the MPRB expects to have a central role in the design of Segment A.
- MPRB does not support the co-location alternative.

Thank you for this opportunity to comment on the DEIS for the LRT. If you have any questions, please do not hesitate to contact Jennifer Ringold, Manager of Public Engagement and Citywide Planning, at 612-230-6464 or jringold@minneapolisparcs.org.

Sincerely,



John Erwin
President, Minneapolis Park and Recreation Board

Introduction

The Minneapolis Park and Recreation Board (MPRB), a semi-autonomous government agency, was established in 1883 by the Minnesota State Legislature. It owns, operates, or maintains park land within the cities of Minneapolis, Golden Valley, Richfield, Robbinsdale, Saint Louis Park, and Saint Anthony. The MPRB is also one of 10 regional park implementing agencies that works with the Metropolitan Council to acquire and develop parks and trails to protect natural resources and provide outdoor recreation for public enjoyment in the Metropolitan Area.

In 2013, the MPRB will celebrate 130 years of providing outstanding park and recreation services to residents and visitors of Minneapolis. In citywide surveys, residents often remark that the Minneapolis park system is essential to their quality of life and to the identity of the city. Founders of the system, such as H. W. S. Cleveland and Theodore Wirth, understood the role parks play in a healthy, livable, and balanced city. They made preserving land for future generations a priority. Their success shaped the character of Minneapolis and continues to improve people's lives.

Segment A of the Locally Preferred Alternative (LPA) of the Southwest Transitway (LRT) and its station areas include, cross, and are adjacent to neighborhood and regional parks and regional trails that are owned or maintained by the MPRB. These include the following (see [map](#) below):

- Minneapolis Chain of Lakes Regional Park
 - Cedar Lake Park
 - Cedar Lake
 - Kenilworth Channel
 - Lake of the Isles
 - Lake Calhoun
 - Cedar Lake Parkway and Trails (bicycle and pedestrian)
 - Dean Parkway and Trails
- Grand Rounds National Scenic Byway
- Kenilworth Regional Trail (bicycle and pedestrian)
- Cedar Lake Regional Trail (bicycle and pedestrian)
- Park Siding Park

With its extensive land holdings and maintenance responsibilities, the MPRB is obligated to identify the historical, cultural, visual, recreational, social, environmental, and safety issues and impacts related to Segment A of the LPA and ensure that these parks, trails, and the current and future interests of park and trail users are protected.

MPRB Community Advisory Committee

On 1 September 2010, the MPRB approved the following charge for the appointed Community Advisory Committee (CAC):

Prepare recommendations to the Board on the contents of a formal Comment Letter in response to the Draft Environmental Impact Statement for the proposed Southwest Light Rail Transit Alternative 3A. The recommendations of the CAC shall focus on desired outcomes relative to historical, cultural, visual, recreational, social, environmental, and safety issues as they relate to lands owned or managed by the Minneapolis Park and Recreation Board.

Appointers and CAC members are below:

Appointing Person or Group	Appointee
Board President John Erwin	Scott Neiman, Chair
MPRB Commissioner Anita Tabb, District 4	Eric Sjoding
MPRB Commissioner Brad Bourn, District 6	Kendal Killian
MPRB Commissioner Annie Young, At-large	Caitlin Compton
MPRB Commissioner Bob Fine, At-large	Matt Perry
Bryn Mawr Neighborhood Association	Barry Schade
Cedar-Isles-Dean Neighborhood Association	John Erickson
Cedar Lake Park Association	Brian Willette
Kenwood Isles Area Association	Jeanette Colby
Lowry Hill Neighborhood Association	George Puzak
West Calhoun Neighborhood Council	Meg Forney
Harrison Neighborhood Association	Maren McDonell
Hennepin County Commissioner Dorfman	Tim Springer
Council Member Goodman – Ward 7	Neil Trembley
Council Member Tuthill – Ward 1	D'Ann Topoluk
Council Member Hodges – Ward 13	Ben Hecker
Council Member Samuels – Ward 5	Vicki Moore
Mayor of Minneapolis R.T. Rybak	Jerry Van Amerongen

Supported by MPRB staff lead Jennifer Ringold and consultant Anne Carroll (Carroll, Franck & Associates), the CAC began meeting in September 2010, suspended work for most of 2011 with the DEIS delays, and scheduled their 2012 meetings to coincide with the anticipated DEIS release. Working from comprehensive background information and their own knowledge and community connections, the CAC generated an increasingly detailed set of issues and preferred MPRB outcomes. Once the DEIS was released in October 2012, the CAC created a “crosswalk” connecting DEIS contents with their issues and outcomes, which was then converted to this Comment Letter. This final version of the Comment Letter was formally approved by the MPRB Board on December 5, 2012.

Comment Letter Structure

Beginning with the entire corridor, the content of this comment letter is organized by location from north to south as shown in the Table of Contents and on the [map](#) below.

The first section presents MPRB’s adopted opposition to the co-location alternative. The remaining sections focus on the locations where the MPRB has an interest in the design and implementation of the LRT project, they include the following subsections:

- **Location and Description:** This describes the location and why it was selected by the MPRB for DEIS comments.
- **Issues:** The issue and why it is important at the particular location is described. For each issue, the MPRB then provides one or more of the following:
 - **Outcomes:** Critical *outcomes* that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.
 - **Statements:** MPRB’s adopted positions on critical issues or processes that must be resolved, reconciled, reevaluated, or otherwise included in near-term design work and decision-making.
 - **Corrections:** Identified errors in the DEIS that must be corrected for the FEIS and subsequent work.

Images are courtesy of MPRB unless otherwise noted; specifically, most aerials and maps are from Google and current to 2012, and are cited.

Corridor and Comment Location Map



Co-Location Alternative

According to the Section 4(f) review of the co-location alternative in the DEIS, this alternative will result in permanent loss of park land and impairment to MPRB properties and uses.

Below is the statement that the MPRB has adopted regarding co-location.

Statement: The MPRB opposes the co-location alternative and supports the co-location findings presented in the DEIS regarding Section 4(f) and Section 106 impacts to lands owned or maintained by the MPRB. Based on a review of the documents, the permanent loss of park lands, impacts to regional trail functionality and capacity, and harm to the Grand Rounds Historic District (eligible for the National Register of Historic Places) cannot be mitigated within the corridor.

1 Entire Corridor

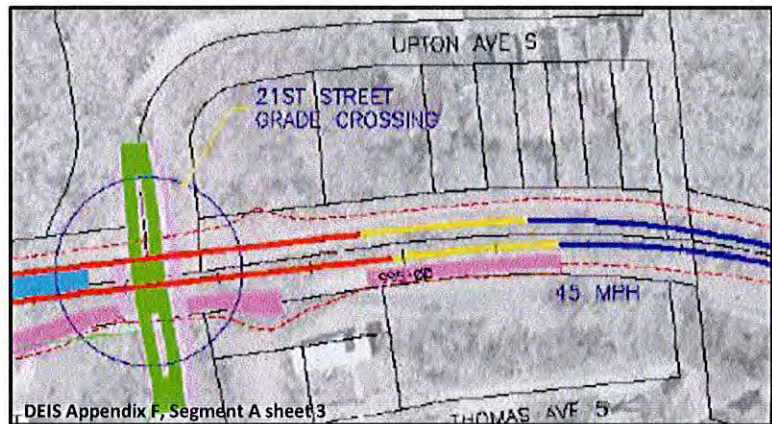
1.1 Location and Description

This section includes issues and outcomes that apply to all or most of the corridor. The sections that follow this focus on issues and outcomes that are specific to certain locations. See [map](#) above.

1.2 Issue: Section 4(f) analysis

A primary concern for the MPRB is protecting park land and recreational opportunities within and adjacent to the corridor for current and future generations. Chapter 7 of the DEIS contains the Section 4(f) evaluation of the project. It identifies potential permanent use, temporary use, and constructive use of park land for the project. For Segment A of the LPA it shows that 0.016 acres may be a potential temporary use and does not identify any potential permanent or constructive uses.

Permanent and Temporary use: Within an urban setting continuous park land and linear corridors are critical to habitat management and connectivity for park users. According to the Appendix F *LRT Alternative Segment Plan and Profile STA: 972+00 -1023+00* preliminary concepts for the area near 21st Street, additional park land may be needed to accommodate the westernmost LRT track. The analysis of park lands that are covered by Section 4(f) regulations in the DEIS does not account for this land.



Constructive use: The DEIS articulates (7.1) that “use” of a Section 4(f) resource occurs when, among other things, “There is no permanent incorporation of land, but the proximity of a transportation facility results in impacts so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired (e.g., ‘constructive use’).” Based on this definition, the MPRB anticipates that park land and park users may experience long-term impacts of the LRT due to noise, vibration, visual impacts, and safety. Park lands that are eligible for the National Register of Historic Places are considered especially vulnerable to these impacts. Depending on final design, these impacts may be so severe that they would constitute a *constructive use* of protected properties under Section 4(f) regulations.

Below are the critical statements and outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.2.1 **Statement:** Park lands near 21st Street that are shown as being used for the LRT track in the conceptual designs must be reevaluated under Section 4(f) to identify all permanent and temporary uses.
- 1.2.2 **Statement:** As the design progresses, park lands must be evaluated under Section 4(f) to identify all permanent and temporary uses.
- 1.2.3 **Statement:** As the design progresses, park lands must be reevaluated under Section 4(f) to determine whether there are constructive uses of park land due to long-term noise, vibration, and visual impacts.
- 1.2.4 **Statement:** As the design progresses, park lands must be reevaluated under Section 4(f) to determine whether there are constructive uses of park land due to long-term impacts on parks that are considered eligible for the National Register of Historic Places.

1.2.5 **Outcome:** Park land along the corridor is preserved in the same or better condition.

1.2.6 **Outcome:** Park property is not used permanently as part of LRT development.

1.3 Issue: Design character

Aside from Park Siding Park, the park land the MPRB owns, manages, and maintains adjacent to the corridor is classified as a regional park. A regional park according to the Metropolitan Council's 2030 Regional Parks Policy Plan is "area of natural or ornamental quality for nature-oriented outdoor recreation such as picnicking, boating, fishing, swimming, camping, and trail uses." Park Siding is considered a neighborhood park by the MPRB which means it is a block or less in size and provides basic facilities within a neighborhood.

The MPRB recognizes that current development and public use of the corridor within Minneapolis from the St. Louis Park boundary to the Penn Station has an open and natural area character that includes portions of the Minneapolis Chain of Lakes Regional Park. Portions of this area are within the Grand Rounds Historic District that is eligible for the National Register of Historic Places and are included within an Important Bird Area as designated by the National Audubon Society. Park design in this area focuses on serenity, habitat restoration, minimal development, and passive recreation. Minimizing impacts to water table levels and quality, cultural landscapes, habitat and open space will be critical to retaining this area's character. LRT and station area design that is sensitive to these issues is essential to protect the activities, features, and attributes of the park land in this corridor.



The DEIS makes several references to this issue, including the following:

- 4.1.3.6 Groundwater Sensitivity, page 4-19: Several areas in the study area lie within zones of very high sensitivity to pollution of the water table system...Portions of the land between Cedar Lake and Lake of the Isles....
- 4.1.4.2 Groundwater, page 4-21: The Build Alternatives may have long-term impacts on groundwater if a permanent water removal system (dewatering) is required. Permanent water removal is anticipated where the cut extends below the water table. There is a probable need for permanent water removal at one cut on both Segment 1 and Segment 3, and possible needs on Segment A and at a second cut along Segment 3, because of shallow groundwater. Evaluations and associated impacts of permanent water removal at the major excavations are summarized in Appendix H.
- 4.3.3.1 Riparian Habitat Areas, page 4-50: The LRT 3A (LPA) passes over several riparian areas that are associated with Purgatory Creek, South Fork Nine Mile Creek, Nine Mile Creek, Minnehaha Creek and the unnamed channel [Kenilworth Channel] between Lake of the Isles and Cedar Lake. The alternative would impact native wetland or riparian habitats, which are typified by non-native woody wetland habitat, non-native emergent wetland habitat or open water habitat (MLCCS 2008). The development of linear ROW along portions of this alignment has fragmented many wetland habitats on both sides of these features. Development of this alternative would likely increase the fragmented nature of wetland and riparian habitats.
- 3.1.2.4, Land Use and Socioeconomics, page 3-16: Northwest of Lake Calhoun and between Cedar Lake and Lake of the Isles the city has established the Shoreland Overlay District that specifies development guidelines within a half-mile radius around each of these lakes. Although the ordinance does not prohibit

transportation uses or facilities, it does specify guidelines for controlling both point source and non-point source pollutant discharge within the Shoreland Overlay District.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.3.1 **Statement:** MPRB insists that stormwater impacts to Minneapolis water bodies result in no increased volume of runoff and no increased pollutant loads.
- 1.3.2 **Outcome:** Minneapolis Chain of Lakes Regional Park and adjoining park land remains a quiet, tranquil, and natural park destination.
- 1.3.3 **Outcome:** The area between Lake Street and I-394 is naturally beautiful and serene.
- 1.3.4 **Outcome:** Natural wildlife habitat and serenity of the trail and park land are maintained.
- 1.3.5 **Outcome:** Any permanent dewatering methodologies applied to the corridor protect water table levels and quality, and habitat within the park lands that is dependent on those water levels.
- 1.3.6 **Outcome:** Permeable paving materials are incorporated to reduce stormwater impacts to park land when hard surfaces are added by the project.
- 1.3.7 **Outcome:** The Chapter 551, Article VI Shoreland Overlay District of the City of Minneapolis' Code of Ordinances is followed to preserve and enhance the environmental qualities of surface waters and the natural and economic values of shoreland areas within the city.

1.4 Issue: Trail access, use, and maintenance

The MPRB owns or maintains trails that are within or cross the LPA Segment A corridor. The MPRB is concerned that the LRT frequency and speed will impact these trails and users by reducing access to the trail from local neighborhoods and park lands, inhibiting flow and speed, adding time delays, introducing use/user conflicts and safety problems, and making the trails more difficult to maintain year-round. The MPRB is concerned that the full cost of reconstructing and resurfacing these federally funded trails will not be included in the project budget.



The DEIS makes several references to the importance of retaining the trails. It also mentions the anticipated increased use that will result from population increases and transit development. The references include:

- 10.5.3.1 Improved Multimodal Environment, page 10-18: Transitway project will improve the existing pedestrian and bicycle infrastructure along the alignment, and improve the safety of pedestrians and bicyclists through implemented design guidelines. All pedestrian facilities will be designed in accordance with current design standards and Americans with Disabilities Act (ADA) requirements to ensure access and mobility for all.
- 9.6.6.3 Anticipated cumulative impacts, page 9-23: The urban and suburban areas along the Southwest Transitway, as in the entire Twin Cities area, are expected to continue to develop and become denser. The Southwest Transitway's proposed stations in combination with RFFAs- especially residential projects – will

be part of this trend. Because fully developed urban areas typically have little opportunity for the creation of new parks and recreation areas, the existing parks are likely to become more crowded and intensely used.

- Appendix F, Legend for Plan, page 5: The grading for the trails shown will be included in the project cost, however the surfacing for the trails will not be included with the project costs. Trail surfacing must be performed at the expense of others.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.4.1 **Statement:** As the implementing agency of regional parks and trails in the City of Minneapolis, the MPRB insists that the full cost of reconstructing and resurfacing trails that are impacted by the project is borne by the project budget.
- 1.4.2 **Statement:** The project should further examine the advantages and disadvantages of the trail being aligned on the west or east side of the LRT. The route analysis should consider the number of times the trail must cross the LRT, changes in trail length, trail connections, trail access points, and park land access.
- 1.4.3 **Outcome:** There is adequate access to the Kenilworth Regional Trail from both sides of the LRT tracks, and access points are a reasonable walking distance apart.
- 1.4.4 **Outcome:** The trail alignment minimizes the number of times that the trail crosses the LRT, optimizes trail connections, maintains similar travel distances, provides sufficient access points, and ensures access to park lands.
- 1.4.5 **Outcome:** Bike and pedestrian trails remain with the same or better design quality and width as current trails; these include those that run along and across the corridor, as well as access trails.
- 1.4.6 **Outcome:** The trail design meets the needs of current and projected users.
- 1.4.7 **Outcome:** The trail is designed for a 20 mph design speed (including straight-line ascents and descents at bridges).
- 1.4.8 **Outcome:** Bicycle and walking trail users have a positive, linear park-like experience, including being free of obstructions, having a 2-foot or greater buffer on each side of all trails, and retaining a sense of connection to open space.
- 1.4.9 **Outcome:** All trail connections are maintained or improved.
- 1.4.10 **Outcome:** At all points along the corridor, and especially at the narrowest locations, sufficient space remains for trails, trail users, and year-round maintenance vehicles and crews.

1.5 Issue: Noise and Vibration

The MPRB is concerned about the LRT noise and vibration impacts on park lands and park and trail users due to the high number of trains that will travel through the corridor daily. An increase from a few freight trains per day to hundreds of LRT trains will dramatically increase the amount of time that park and trail users are exposed to noise and vibration. This could substantially diminish the park and recreation experience for park and trail users.

For noise, the MPRB is particularly concerned that park lands in the corridor are erroneously classified as a Category 3 land use. In FTA's land use categories for Transit Noise Impact Criteria, Category 3 is most commonly associated with institutional land uses and can be used for some types of parks. By contrast, Category 1 is for tracts of land where quiet is an essential element in their intended purpose. This category includes lands set aside for serenity and quiet, and such land uses as outdoor amphitheaters and concert pavilions, as well as National Historic Landmarks with significant outdoor use. Category 1 is more closely aligned with the regional park classification that applies to the majority of park land in the area.

The DEIS makes several references to this issue, including the following:

- 4.7.3.5 Assessment, page 4-92: There is one moderate impact to a Category 3 land use. The impact is due to very low ambient background noise levels found in the walking trails of the Cedar Lake portion of the Minneapolis Chain of Lakes Regional Park combined with close proximity to the tracks and bell use at grade crossings and crosswalks. This may not apply to the entire Cedar Lake portion of the park, especially in areas where park-goers themselves create higher noise levels, and area of the park farther from the tracks.
- 4.8.6 Mitigation, page 4-118: Detailed vibration analyses will be conducted during the Final EIS in coordination with Preliminary Engineering. The Detailed Vibration Assessment may include performing vibration propagation measurements. These detailed assessments during the Final EIS/preliminary engineering phase have more potential to reduce project-related effects than assessments of mitigation options at the conceptual engineering phase of the project. Potential mitigation measures may include maintenance, planning and design of special trackwork, vehicle specifications, and special track support systems such as resilient fasteners, ballast mats, resiliently supported ties, and floating slabs.

Below are the critical statements and outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.5.1 **Statement:** Category 1 is most consistent with the type of parks and open space the MPRB owns or maintains adjacent to or within the corridor. Noise impacts on park lands and users must be reevaluated under the standards set for Category 1 land uses.



1.5.2 **Outcome:** The vibration impacts are minimized for park and trail users.

1.5.3 **Outcome:** The noise impacts are minimized for users of parks and trail and park users and do not exceed the noise standards set for Category 1 in adjacent park land and along the trail.

1.5.4 **Outcome:** Technologies are incorporated that reduce track noise and vibration.

1.5.5 **Correction:** In 4.7.3.5 page 4-92, it appears that Segment 4 is referenced instead of Segment A.

1.6 Issue: Visual appeal

The MPRB is concerned about the impacts on park land and users of the parks and trails by visual impacts of the LRT. These concerns include the impacts on view sheds within and outside of the parks, especially those that are part of the Grand Rounds Historic District, which is eligible for listing on the National Register of Historic Places.

The DEIS makes several references to this issue, including the following:

- 3.6.3.3 Visual impacts, page 3-115: The proposed alignment is on a bridge over Cedar Lake Parkway. Visual impacts on sensitive receptors adjacent to the corridor in the multi-family residential parcel and Cedar Lake Parkway could be substantial.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

1.6.1 **Outcome:** The visual impact of the LRT and related infrastructure is minimized for trail and park users and honors the historic character of the Grand Rounds when it crosses Cedar Lake Parkway and the Kenilworth Channel.

1.6.2 **Outcome:** The train lights have minimal visual impacts on trail users.

1.7 Issue: Safety

Safety of park and trail users is a critical objective for the MPRB. This includes using design to reduce risks from user conflicts or unexpected hazards and ensuring adequate access to park facilities when the LRT is in operation. Delays in fire, police, and emergency medical response to park facilities, especially beaches, may result from the high number and frequency of trains that are projected to travel through the corridor.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.7.1 **Outcome:** Adequate fire safety infrastructure exists within or proximate to the corridor such that fire suppression and response times meet relevant laws and standards.
- 1.7.2 **Outcome:** Fire, police, and emergency medical personnel and equipment are able to access park lands adjacent to the corridor and provide response times that meet relevant laws and standards.
- 1.7.3 **Correction:** The Minneapolis Park Police should be included in the references to police agencies related to the corridor.



Timely public safety access is essential

1.8 Issue: Construction

The MPRB recognizes that Minneapolis has become one of the top bicycling communities in the country. As such, trail users rely on high quality trail facilities year round for recreation and commuting. A detour that requires significant rerouting of trail users or an extended closure of a trail will be a barrier to trail users on the western side of Minneapolis and the metro area.

Construction can result in extensive damage to vegetation and trees through removals and introduction of invasive species. The former results in a diminished quality of the park and recreation experience for trail and park users, the latter results in long-term habitat management issues for MPRB staff. Additionally, construction can result in the altering the ground and surface water levels and quality if Best Management Practices (BMPs) are not implemented.

The DEIS makes several references to this issue, including the following:

- 6.3.3.1 page 6-60: Short-term construction effects to bicyclists and pedestrians are also anticipated in all Build Alternatives. In Segments 1, 4, A, and C, some disruptions to the existing regional trails are anticipated during construction. The extent to which the trails would be available for use throughout the process of relocation will be determined during Preliminary Engineering. Disruptions to the existing sidewalk network are anticipated in all Build Alternatives.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 1.8.1 **Outcome:** Surface and groundwater quality is protected during construction.
- 1.8.2 **Outcome:** Reasonable and safe alternative routes are provided for trail users when sections are closed

during construction.

- 1.8.3 **Outcome:** Any flora that is lost to construction or LRT use is replaced with flora that is in accordance with MPRB plans, with monitoring through a plant survey and replacement for five (5) years after construction is complete.
- 1.8.4 **Outcome:** Soils and slopes are stabilized during construction.
- 1.8.5 **Outcome:** Construction dewatering protects water table levels and habitat within park lands that is dependent on those water levels.
- 1.8.6 **Outcome:** Construction practices prevent introduction of new invasive species to park lands and waters.

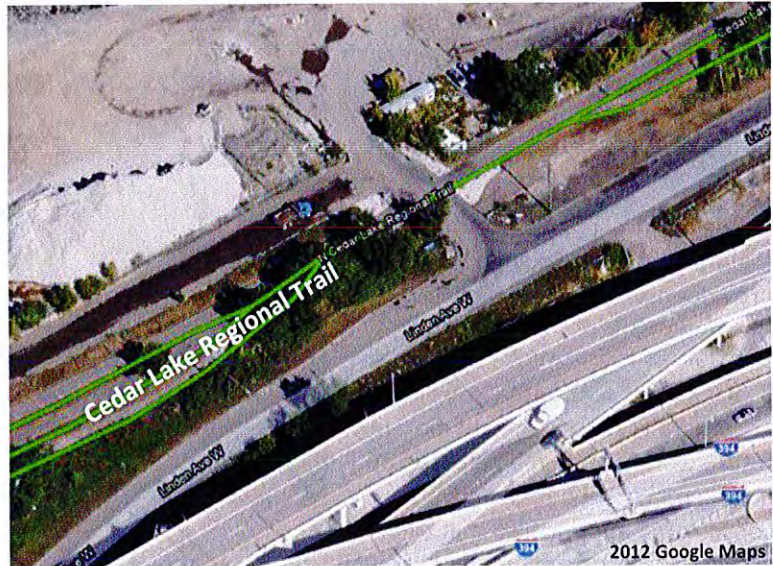


MPRB Prairie Maintenance near Cedar Lake Park

2 Linden Avenue

2.1 Location and Description

Linden Avenue serves as an informal trail access point, as it is used primarily by city maintenance vehicles to access the asphalt and concrete recycling facility. Trail users at this access point regularly deal with high vehicular traffic with the nearby entrance to I-394. At this location, the LRT line and trail separate from MPRB-owned land.



2.2 Issue: Access, flow

The MPRB is concerned that all future work in this area be based on a comprehensive design and coordinated approach. This location requires formal and safe trail access, and cyclists need continuous flow and speed on the federally funded Cedar Lake Regional Trail.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 2.2.1 **Outcome:** Trail users easily and safely access the Cedar Lake Regional Trail.
- 2.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 2.2.3 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.
- 2.2.4 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.



From Linden Avenue junction, looking southwest along Cedar Lake Regional Trail



From Linden Avenue junction, looking northeast along Cedar Lake Regional Trail

3 Luce Line Regional Trail Junction

3.1 Location and Description

At this location the Luce Line Regional Trail intersects with the Cedar Lake Regional Trail, currently via a bridge over the industrial area and freight rail line, and spiral ramps at each end.

This is a critical connection in the regional trail system, and also provides access to Bryn Mawr Meadows Park.



3.2 Issue: Access, flow

The MPRB is concerned that all future work in this area be based on a comprehensive design and coordinated approach so that trail and park access be maintained, as well as flow and speed on the regional trails.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 3.2.1 **Outcome:** Trail users easily and safely make connections between Bryn Mawr Meadows Park, the Luce Line Regional Trail, and the Cedar Lake Regional Trail.
- 3.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 3.2.3 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.
- 3.2.4 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.



Luce Line Regional Trail crossing to connect with the Cedar Lake Regional Trail

4 Spring Lake Trail Junction

4.1 Location and Description

At this location Cedar Lake Regional Trail users pass under I-394 and easily connect to the nearby parks and trails including Spring Lake, Kenwood Parkway, and Parade Stadium, and travel beyond to the Minneapolis Sculpture Garden, Loring Park, and the Grand Rounds National Scenic Byway.



4.2 Issue: Access, flow, and connectivity

As a critical access point to MPRB park lands and the Grand Rounds, the MPRB is concerned that safe and easy access and connectivity is retained. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.2.1 **Outcome:** Cedar Lake Regional Trail users easily and safely connect to Spring Lake Park, Grand Rounds, other parks, parkways, and Van White Boulevard.
- 4.2.2 **Outcome:** Bicyclists in this area maintain continuous flow and speed.
- 4.2.3 **Outcome:** The design prioritizes connectivity to neighborhoods and natural amenities.

4.3 Safety

In this small space under I-394, the MPRB is concerned about public safety and emergency vehicle access. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.3.1 **Outcome:** Fire, police, and emergency medical personnel and equipment can access the trail and Spring Lake and provide response times that meet relevant laws and standards.



From junction, looking southeast toward Spring Lake

4.4 Issue: Comprehensive approach

As with many locations along the LRT, this area will likely be subject to future development. The MPRB is concerned about protecting the integrity and natural features of Spring Lake and full functionality of the Cedar Lake Regional Trail. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 4.4.1 **Outcome:** Spring Lake and the area's natural features are preserved and protected.
- 4.4.2 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.
- 4.4.3 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.

5 Bryn Mawr Meadows Park

5.1 Location and Description

Bryn Mawr Meadows Park is an active neighborhood park with citywide appeal. Amenities include ball fields, tot-lots, wading pools, and tennis courts. The park is adjacent to the Cedar Lake Regional Trail and LRT line. Currently parks users are connected to the Cedar Lake Regional Trail via a bridge over the industrial area and freight rail line, and spiral ramps at each end.



5.2 Issue: Access and safety

The MPRB is concerned about ensuring that people from throughout the community can access both this heavily used park *and* the Cedar Lake Regional Trail from this area, and that the trail remains fully functional.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 5.2.1 **Outcome:** Communities on both sides of the LRT safely and easily access the Cedar Lake Regional Trail and Bryn Mawr Meadows Park.

5.3 Issue: Visual appeal

The MPRB is concerned that this large and active park retain its open and natural feel. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 5.3.1 **Outcome:** The LRT blends in visually with the natural setting of the area.

5.4 Issue: Comprehensive approach

The MPRB is concerned that all future work in this area be based on a comprehensive design and coordinated approach.

- 5.4.1 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.
- 5.4.2 **Outcome:** Trail development is coordinated with rail, residential and commercial development in the area.



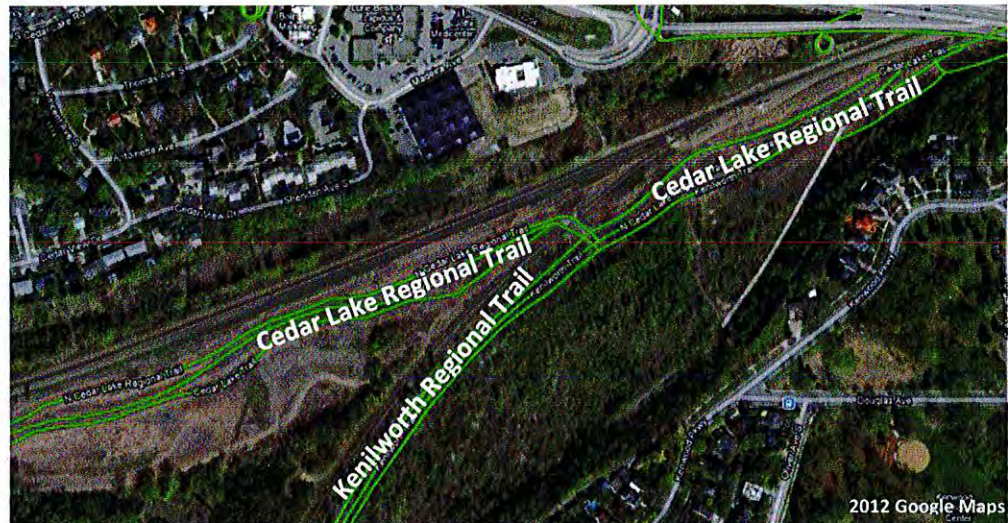
Bryn Mawr Park, looking south from Morgan Avenue

6 Cedar Lake Regional Trail and LRT Crossing Area

6.1 Location and Description

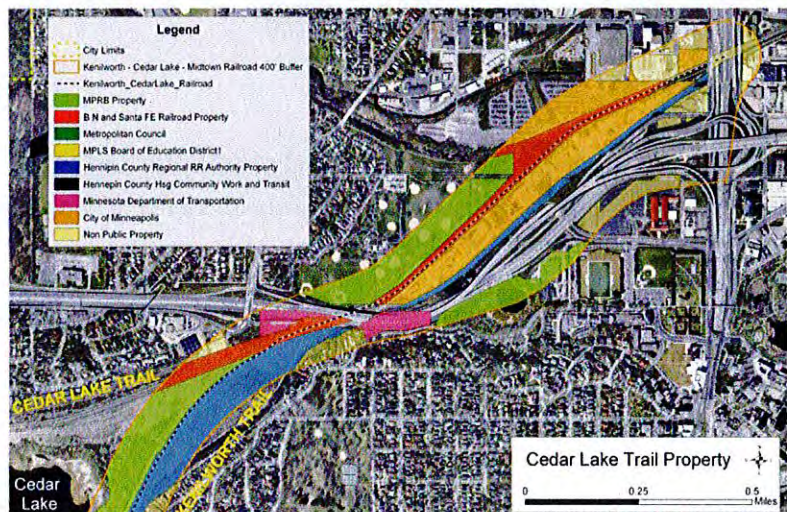
The federally funded Cedar Lake Regional Trail carries commuter and recreational bicyclists and pedestrians between downtown Minneapolis and the western suburbs.

At this location the trail junctions with the Kenilworth Regional Trail and the LRT follows the Kenilworth alignment



south. In this area the bike trails are separated into north- and south-bound, and there is a separate pedestrian trail. The land in this area is owned by the County and the MPRB. Per agreement, all of the trails are maintained by the MPRB.

Into this already complex area the LRT brings dramatically increased challenges (6.3.2.4).



6.2 Issue: Safety, use, access, connectivity

In 2011, according to the Metropolitan Council's annual visit estimates, Kenilworth Regional Trail had approximately 624,400 visits and the Cedar Lake Regional Trail had 381,400 visits. The MPRB is very concerned about retaining safe and high-quality use and access to these regional trails in this area for all users and from designated access points.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 6.2.1 **Outcome:** Walkers, runners, bicyclists, and other nonmotorized trail users safely and efficiently get from one side of the LRT tracks to the other, year-round and without interruption.
- 6.2.2 **Outcome:** The federally funded, nonmotorized Cedar Lake Regional Trail is fully functional, with uninterrupted flow and speed.
- 6.2.3 **Outcome:** All users have adequate access to the trails.

- 6.2.4 **Outcome:** All trail connections are safe and easy to navigate, and space is allowed for future expansion to meet demand.
- 6.2.5 **Outcome:** The Cedar Lake Regional Trail meets commuter bicycle standards of 20 mph design speed.
- 6.2.6 **Outcome:** Communities north of the LRT easily access the Cedar Lake Regional Trail, Cedar Lake, and Cedar Lake Park.



At junction of Kenilworth Regional Trail (center left) and Cedar Lake Regional Trail (top left and bottom right)



At junction, looking west along divided Kenilworth Regional Trail

6.3 Issue: Environmental protection

The MPRB park lands in this area bring significant benefits to park and trail users, support native plant species, and are serve as important wildlife habitat.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 6.3.1 **Outcome:** Park lands retain their natural character.
- 6.3.2 **Outcome:** Wildlife habitat supports local and migratory fauna.



Cedar Lake Park and Cedar Lake Regional Trail - Prairie

7 Intersection with West 21st Street

7.1 Location and Description

The intersection of the Kenilworth Regional Trail and 21st Street is a proposed station location. The station would sit on Hennepin County property, however the west side of the rail line is MPRB property, Cedar Lake Park.

At 21st Street, Cedar Lake has a very popular beach and provides access to a trail network as well as informal foot paths.



7.2 Issue: Park access



At intersection, look west into Cedar Lake Park

This location is the sole access point for Cedar Lake Park and beach. Visitors arrive at this pristine area on foot, by bicycle, and using motorized vehicles, and via 21st Street, the Kenilworth Regional Trail, and in the future the LRT. Given that “Implementation of LRT service and stations along the Segment A alignment would likely result in some land use changes surrounding the stations...” (3.1.5.1), the natural character of this area and clear access must be ensured.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

7.2.1 **Outcome:** Access to Cedar Lake Park at West 21st Street is attractive, natural, and welcoming.

7.2.2 **Outcome:** People on the east side of the corridor safely and easily access park lands on the west side.

7.3 Issue: Safety

With thousands of park and park land users and multiple modes of transport across and along the corridor at this point, safety is of utmost importance. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

7.3.1 **Outcome:** All Cedar Lake Park users have safe and pleasant access to and from the park, regardless of mode of transport.

7.3.2 **Outcome:** Station design *enhances* safety and access for Cedar Lake Park users.

7.4 Issue: Aesthetics, noise

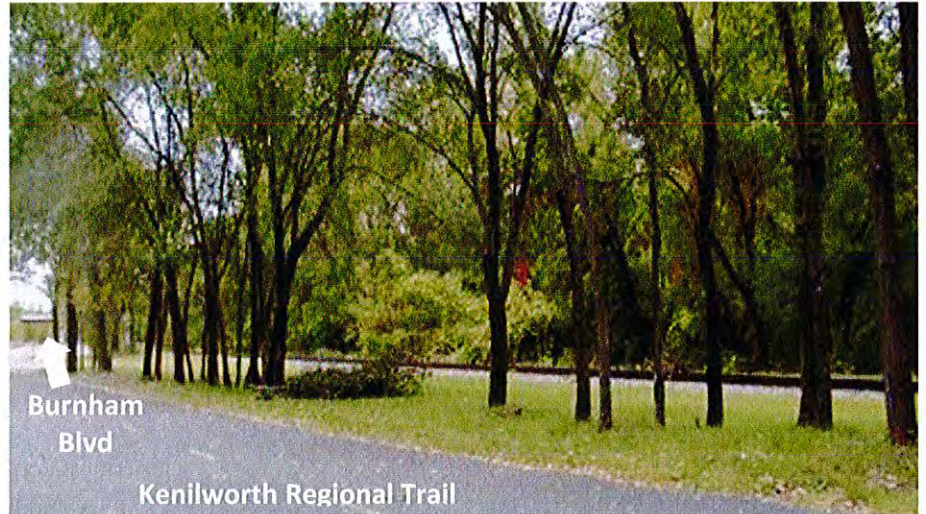
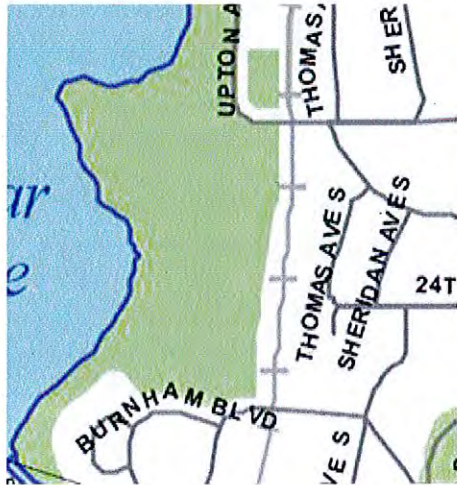
The MPRB is concerned that the anticipated 1,000+ daily LRT boardings (Appendix F, Transit Effects, Figure 2) at

this location would seriously compromise the quality of experience for users of this secluded park area.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

7.4.1 **Outcome:** Cedar Lake Park remains a quiet, tranquil, and natural park destination.

7.4.2 **Outcome:** The area between Burnham Boulevard and 21st Street is naturally beautiful and serene.



Kenilworth Regional Trail

Looking SW from 21st Street



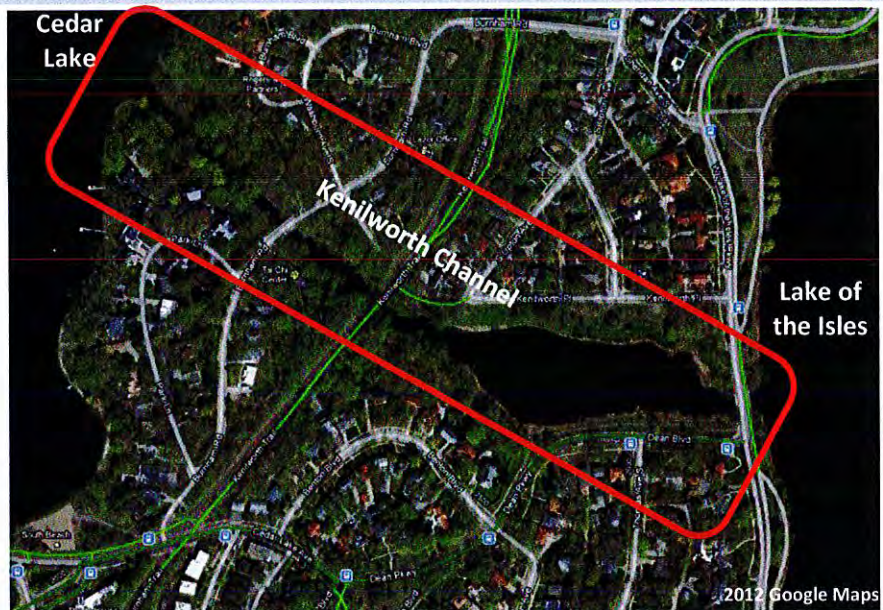
Cedar Lake

8 Kenilworth Channel, Bridge

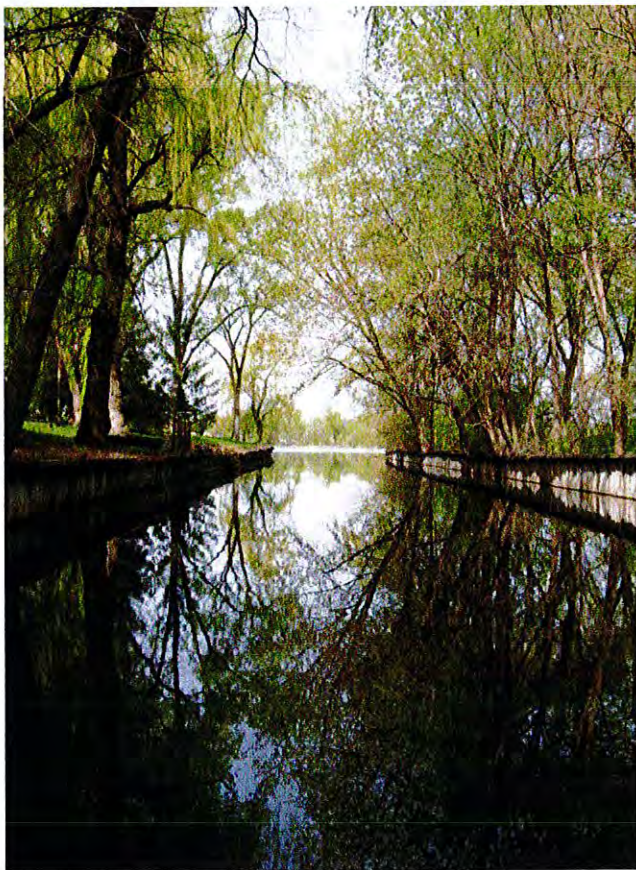
8.1 Location and Description

The proposed alignment of the LRT crosses the Kenilworth Channel, a body of water constructed in 1913 to connect Cedar Lake and Lake of the Isles to form the Minneapolis Chain of Lakes. The Channel has year-round recreational use, from boaters in the summer to skiers and skaters in the winter.

The Channel also provides access for wildlife. The bridge over the Channel for the existing freight tracks and trails is narrow and relatively low to the water.



8.2 Issue: Historic character, aesthetics, tranquility



Kenilworth Channel

The MPRB is concerned about preserving the historic character of the 1913 Kenilworth Channel in its critical role within the Minneapolis Chain of Lakes Regional Park. The channel is part of the Grand Rounds Historic District that is eligible for the National Register of Historic Places.

According to the DEIS (3.6.3.3) ...the bridge design, bank treatment, and aesthetics for the new facility and the potential replacement or modification of the existing pedestrian bridge would have a substantial effect on this historic landscape... In addition, (3.4.5.3) ...Potential long-term effects may occur at the following properties: Kenilworth Lagoon/Channel, Grand Rounds (potential effects of the construction of new bridge structures within the historic district; the design and footprint of these structures may affect the banks of the historic channel and may affect the district's overall feeling and setting).

While the DEIS notes that these issues will be addressed during preliminary engineering, the MPRB is concerned that they receive the most serious attention very early in the process. Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

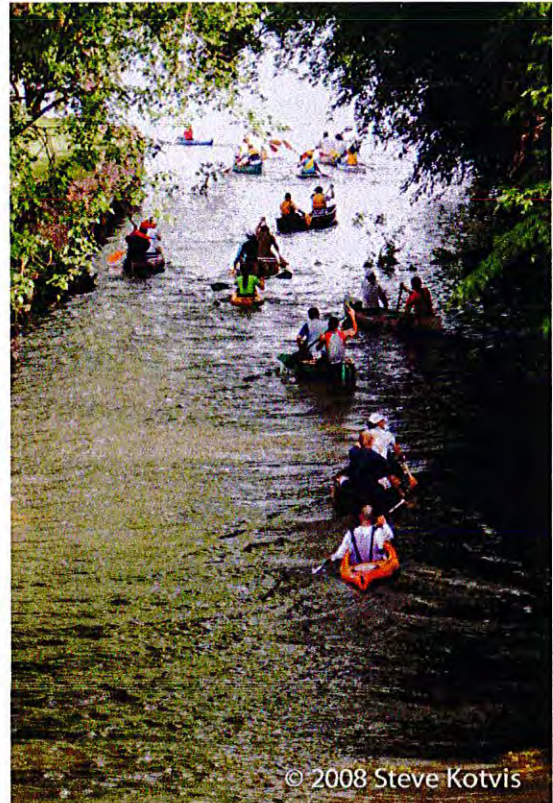
- 8.2.1 **Outcome:** Support and safety structures are harmonious, beautiful, and both historically and context sensitive.
- 8.2.2 **Outcome:** The Kenilworth Channel retains its natural beauty and serenity and historic character.

8.3 Issue: Connectivity and recreational use

The Kenilworth Channel was central to creating the Minneapolis Chain of Lakes and provides a critical connection between Cedar Lake and Lake of the Isles. Trail access is necessary for people as is year-round channel access for both people and wildlife. It is also a critical link in the City of Lakes Loppet (winter ski race) and City of Lake Tri-Loppet.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 8.3.1 **Outcome:** Users have access to the Kenilworth Regional Trail, Cedar Lake, and Lake of the Isles from both sides of the LRT/Kenilworth Regional Trail.
- 8.3.2 **Outcome:** People and wildlife on both sides of the LRT/Kenilworth Regional Trail have access to and along the undeveloped channel shoreline.
- 8.3.3 **Outcome:** Users have unfettered, year-round passage along the channel (in the water/on the ice) between Lake of the Isles and Cedar Lake.
- 8.3.4 **Outcome:** The historic water connection between Cedar Lake and Lake of the Isles remains a defining characteristic of the Minneapolis Chain of Lakes Regional Park.



From Kenilworth Regional Trail looking along Kenilworth Channel – City of Lakes Tri - Loppet

8.4 Issue: Safety



Cedar Lake Park Association Photo

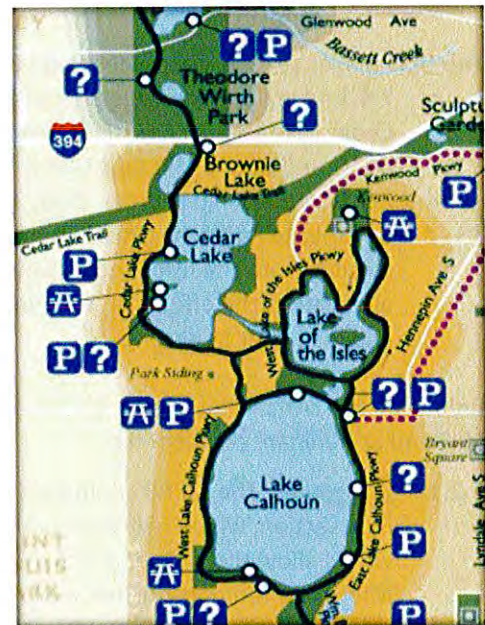
From Kenilworth Regional Trail looking along Kenilworth Channel – City of Lakes Loppet

The MPRB is concerned about protecting the safety of land and water users of the Kenilworth Channel and shoreland.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 8.4.1 **Outcome:** Year-round channel users are safe from falling debris and ice.

9 Cedar Lake Parkway-Grand Rounds



Cedar Lake Section of Grand Rounds

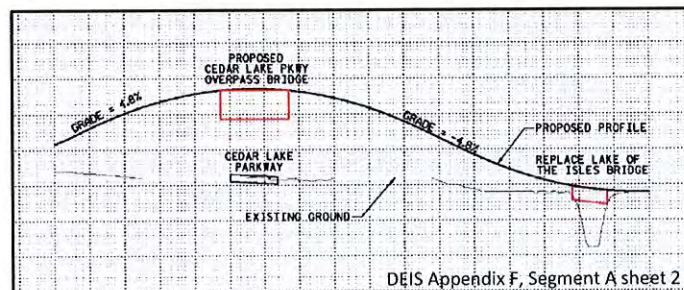
9.1 Location and Description

At this location the LRT intersects with actively used Cedar Lake Parkway, which is an essential section of the [Grand Rounds National Scenic Byway](#) (see Grand Rounds map) and within the Minneapolis Chain of Lakes Regional Park (Cedar Lake Beach, Parkway, and Trail). Directly to the west of this location is Cedar Lake South Beach.

The MPRB is concerned about LRT impacts on the Kenilworth Regional Trail and Chain of Lakes Regional Park users and properties that contribute to the Grand Rounds Historic District. In 2011, according to the Metropolitan Council's annual visit estimates, Kenilworth Regional Trail had approximately 624,400 visits and the Chain of Lakes Regional Park had 5,122,900 visits (Chain of Lakes estimate does *not* include motorized or nonmotorized traffic counts on the parkway). Cedar Lake Parkway, as part of the Grand Rounds Historic District, is considered eligible for the National Register of Historic Places (7.4.1.4 page 7-20).

9.2 Issues: Integrity, flow, and access

The MPRB is concerned that adding LRT into this intersection could result in frequent delays of parkway and trail users along or parallel to Cedar Lake Parkway, and create visual obstructions. The MPRB finds that both of these impacts would significantly diminish the quality of experience for parkway, park, and trail users. Further, such impacts are inconsistent with one of the basic design characteristics of the Grand Rounds: a continuous recreational driving experience.



DEIS Appendix F, Segment A sheet 2

The MPRB is also concerned that the proposal to elevate the LRT above the parkway at this intersection (see image above) will increase noise and create visual impacts that will significantly diminish the quality of experience for parkway, park, and trail users of a property that is eligible for the National Register of Historic Places.

The anticipated frequency of trains along the corridor will also increase potential conflicts between the trains and users of the trail parallel to Cedar Lake Parkway, thus raising serious safety concerns.

The DEIS makes several references to this issue, including the following:

- 7.4.1.4 Section 4(f) Properties Potentially Used by the Project, page 7-20: Cedar Lake Parkway and the Cedar Lake-Lake of the Isles Channel have been determined eligible for inclusion on the NRHP as part of the Grand Rounds Historic District.
- 3.4.5.3 Cultural Resources, page 3-79: Potential long-term effects may occur at the following properties: Cedar Lake Parkway, Grand Rounds (potential effects of the changes to the intersection of the LRT corridor with the historic parkway, including the LRT overpass bridge, and, under the co-location alternative, the effects of widening the trail/rail corridor; these changes may affect the parkway itself and may alter its setting.)

Below are the critical statements and/or outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 9.2.1 **Statement:** The MPRB conducted a preliminary feasibility study of a grade-separated crossing at this intersection, which revealed that lowering the tracks and trail, and bridging portions of the parkway would allow the train and trail to travel beneath the parkway (see Appendix A for illustrations). The MPRB recommends further exploration of this type of integrated solution that significantly reduces safety hazards, noise impacts, visual impacts, and delays for motorized and nonmotorized vehicles.
- 9.2.2 **Outcome:** The Grand Rounds (eligible for National Register of Historic Places) fully retains its integrity and intention.
- 9.2.3 **Outcome:** Motorized and nonmotorized vehicles and pedestrians along the trail parallel to Cedar Lake Parkway experience continuous and safe flow.
- 9.2.4 **Outcome:** Trail users have direct access to the trails and trail connections that are currently provided at this location.
- 9.2.5 **Outcome:** Recreational and commuter trail traffic on both the Kenilworth Regional Trail and the trail parallel to Cedar Lake Parkway follows substantially the same route as at present.
- 9.2.6 **Outcome:** The view of and from Cedar Lake and surrounding parkland is preserved.
- 9.2.7 **Outcome:** The parkland around Cedar Lake remains a natural visual buffer between Cedar Lake and the LRT corridor.



On Cedar Lake Parkway-Grand Rounds; at junction looking SW along Kenilworth Regional Trail; Cedar Lake and beach at right

9.3 Issue: Safety

Safety of park and trail users is a critical objective for the MPRB. This includes using design to reduce risks from user conflicts or unexpected hazards, and ensuring adequate access to park facilities when the LRT is in operation.

Delays in fire, police, and emergency medical response to park facilities, especially beaches, may result from the high number and frequency of trains that are projected to travel through the corridor. Due to the proximity of South Cedar Lake Beach, timely emergency medical access across this intersection is critical.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 9.3.1 **Outcome:** Fire, police, and emergency medical personnel and equipment can access South Cedar Lake beach and provide response times that meet relevant laws and standards.

9.4 Issue: Noise and air quality

The MPRB is concerned about the noise and air quality impacts of LRT at this intersection due to the high frequency of trains that will cross here. For an at-grade crossing, high levels of track, bell, and whistle noise would significantly diminish the quality of experience in adjacent parkland and along the trails. Noise generated by a flyover condition is also a concern. Frequent traffic delays for train crossings are expected to diminish air quality for park and trail users.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 9.4.1 **Outcome:** LRT and crossing-related noise does not diminish the enjoyment and use of the trails, adjacent park land, and Grand Rounds National Historic Byway.
- 9.4.2 **Outcome:** Air quality at this location meets state and federal standards.



At junction, looking NE along Kenilworth Regional Trail



From Kenilworth Regional Trail looking toward Cedar Lake, Grand Rounds

10 Park Siding Park

10.1 Location and Description

The MPRB owns Park Siding Park, a small neighborhood park, which is immediately adjacent to the LRT corridor and an access point to the Kenilworth Regional Trail. With play equipment as well as formal gardens, it is actively used by children and adults from neighborhoods on both sides of the corridor.

10.2 Issue: Access and safety

Although the DEIS commits to improving the pedestrian and bicycle infrastructure along the alignment and improving the safety of pedestrians and bicyclists through implemented design guidelines (10.5.3.1), the MPRB has particular access and safety concerns at this location. Park visitors, including small children, come from both sides of the corridor as well as from the Kenilworth Regional Trail. This is also a popular bicycle and pedestrian trail ingress and egress point.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.2.1 **Outcome:** All users have formal and safe access to the park from both sides of the LRT.
- 10.2.2 **Outcome:** As an important trail access point, the trail design accommodates a safe ingress and egress.
- 10.2.3 **Outcome:** Trail users have safe access to and from the park.

10.3 Issue: Visual appeal

This small neighborhood park provides play equipment for children and formal gardens for adults. The heavily planted berm between Dean Court and the Kenilworth Regional Trail currently provides a visual screen, but the MPRB is concerned with ensuring that during and after construction there is a strong visual barrier that remains compatible with this important neighborhood park.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.3.1 **Outcome:** The LRT's visual impact does not disrupt park visitors' enjoyment, nor detract from the park's character.

10.4 Issue: Noise

The MPRB is deeply concerned about the impact of LRT noise on Park Siding visitors, especially the very young children who frequent this neighborhood park.

Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 10.4.1 **Outcome:** Park users, especially young children, are not subject to LRT noise levels that exceed the noise standards set for Category 1 land uses.



Park, looking SE from Kenilworth Regional Trail access



Kenilworth Regional Trail access, looking toward corridor



A heavily landscaped berm between Dean Court and the corridor provides a safety and visual barrier for Park Siding users

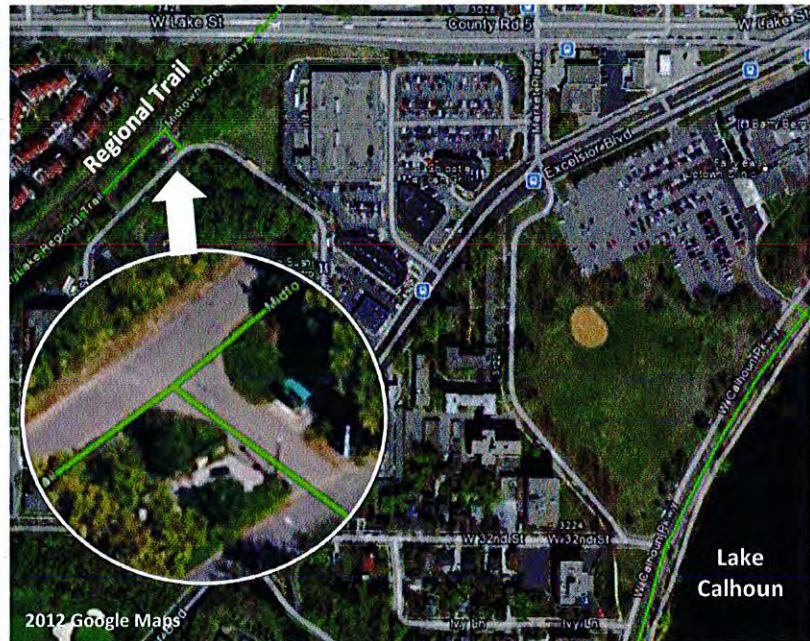
11 Trail Access at Abbott Avenue S (by new West Lake Station)

11.1 Location and Description

This is an actively used trail access to the Kenilworth Regional Trail and Midtown Greenway and is the closest access point to the Chain of Lake Regional Park. West Calhoun Neighborhood Association contributed park-like features to this location including a kiosk, picnic table, bike racks, decorative fencing, and a drinking fountain.

11.2 Issue: Park and trail access

The MPRB is committed to preserving this important trail access, ensuring safe and convenient wayfinding between the trail and nearby Lake Calhoun, and advocating for sufficient bicycle parking for all visitors to the area. The access was originally designed with input from Hennepin County to accommodate future LRT.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 11.2.1 **Outcome:** West Lake station users and all other users have safe and convenient access to and from Lake Calhoun and the Kenilworth Regional Trail.
- 11.2.2 **Outcome:** Wayfinding is provided between the West Lake station and Lake Calhoun and the trails.
- 11.2.3 **Outcome:** Safe and adequate bike parking is provided for recreational and commuter users of the trail and for Lake Calhoun visitors.



12 Northwest Corner of Lake Calhoun Area

12.1 Location and Description

This location within the Minneapolis Chain of Lakes Regional Park is the closest major park land to the proposed West Lake station. It is a primary visitor portal to the Grand Rounds National Scenic Byway. The Calhoun Executive Center parking lot next to Lake Calhoun sits on land that is partially owned by the Minneapolis Park and Recreation Board as part of the Minneapolis Chain of Lakes Regional Park. On weekends and weekday evenings, visitors use this area for parking and to access the regional park and the Grand Rounds.



12.2 Issue: Park and trail access

Millions of annual park visits to this area originate by foot, bicycle, motorized vehicle, and in the future the LRT.

Traffic patterns altered by the addition of a West Lake station will have a direct impact on the park visitor experience and all modes of traffic on Lake Calhoun Parkway and Dean Parkway. The MPRB is concerned that the introduction of the high-volume West Lake station increases the complexity of this area and is committed to ensuring that all visitors have a positive, easy, and safe experience accessing and using the park lands and trails in this area.



Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

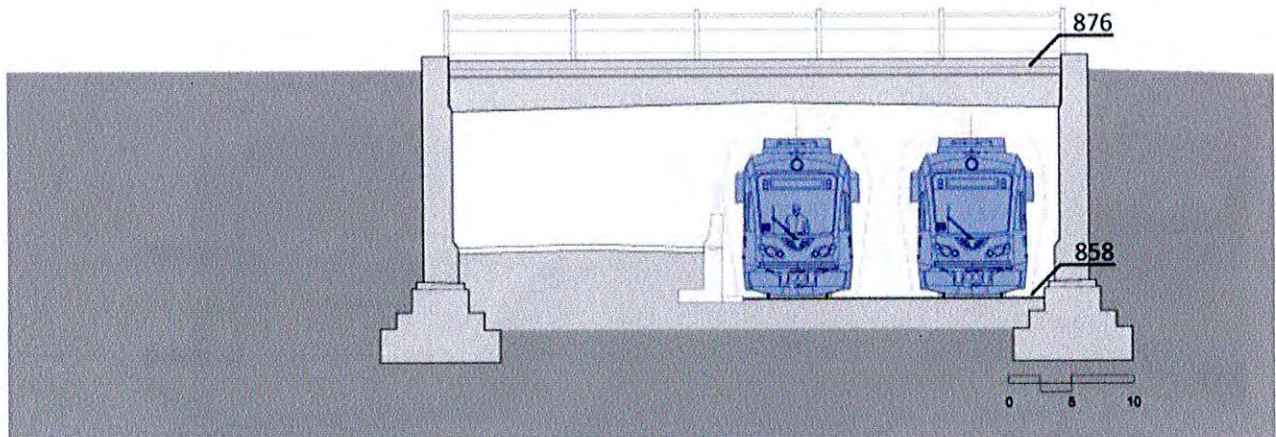
- 12.2.1 **Statement:** Multimodal traffic patterns in a roughly 1/2-mile radius of the West Lake station must be studied in partnership with the street/trail property owners (Hennepin County, City of Minneapolis, MPRB). Deliverables of the study should include traffic volume and flow projections, and recommendations for 1) long-term street/trail network modifications and 2) short-term network modifications to be implemented with station development.

- 12.2.2 **Outcome:** LRT and West Lake station area design decisions for this area are based on design recommendations from a comprehensive and multimodal (bicycle, pedestrian, transit, vehicle) circulation analysis that addresses impacts to the Grand Rounds parkways and trails.
- 12.2.3 **Outcome:** The design of this area makes clear that it is a “gateway” to the Minneapolis park system.
- 12.2.4 **Outcome:** A safe, free-flowing pedestrian and bicycle route with exceptional wayfinding exists between the LRT station area and Lake Calhoun and adjacent park land.
- 12.2.5 **Outcome:** There is no loss of vehicle parking for park and trail users.
- 12.2.6 **Outcome:** Greenspace at the northwest corner of Lake Calhoun is preserved for park visitors and recreational purposes.

13 Appendix A – Cedar Lake Parkway/ Southwest Transitway

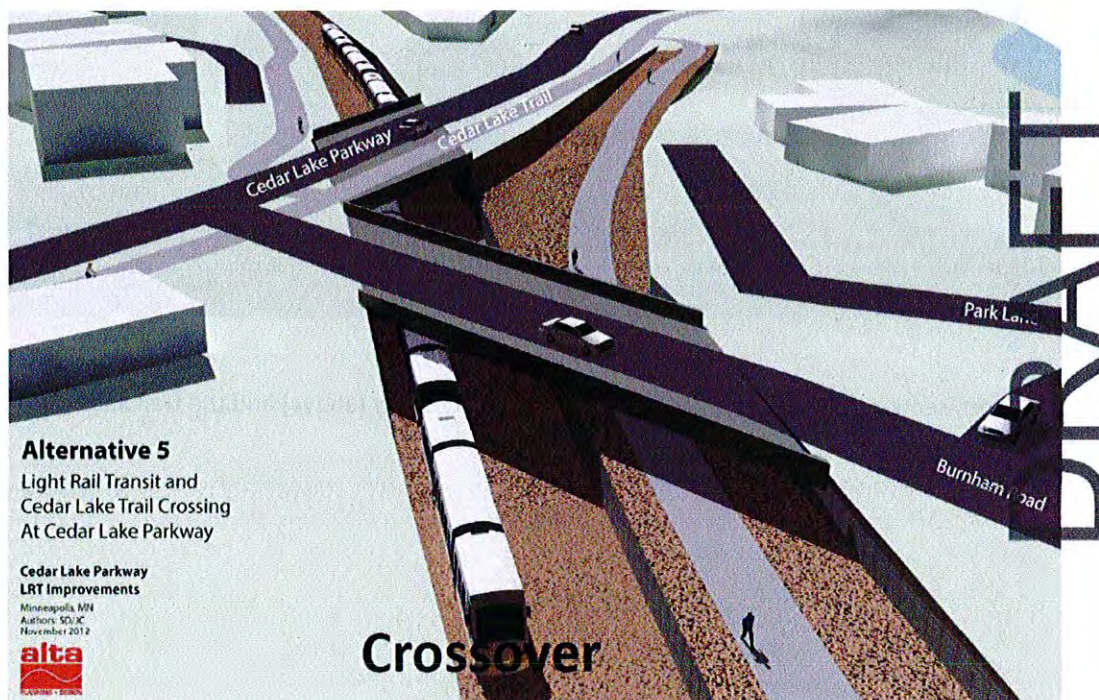
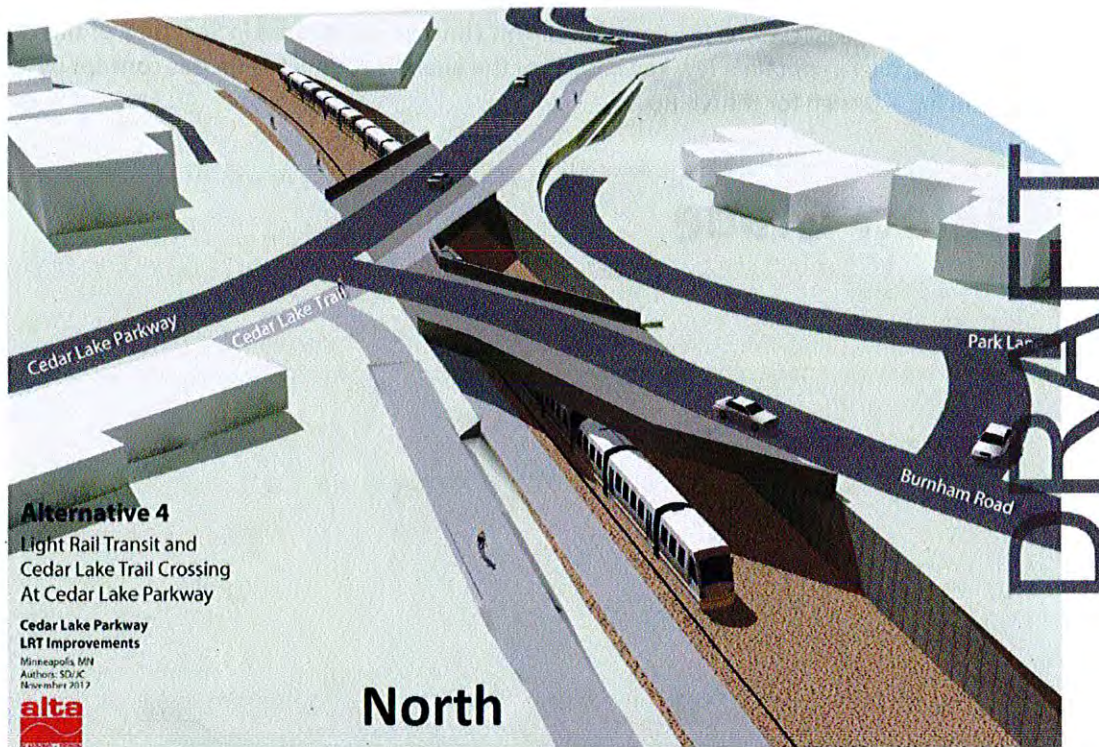
Appendix A is intended to illustrate the concept of lowering the train and trail and bridging Cedar Lake Parkway at the Cedar Lake Parkway/Southwest Transitway intersection. This concept is discussed in Section 9 of this comment letter. The following pages contain a few key images of the analysis conducted on this concept by Steve Durrant of Alta Planning + Design for the MPRB.

Below Grade



Above is a potential cross-section showing elevations for Cedar Lake Parkway (above) and the trail and train.

These are examples of grade separated crossings with trail on east (North version) or west (Crossover version) side of tracks. These are provided to illustrate the concept, not to provide a complete overview of the feasibility study.





SCOTT COUNTY BOARD OF COMMISSIONERS

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JOSEPH WAGNER, DISTRICT 1
TOM WOLF, DISTRICT 2
DAVID MENDEN, DISTRICT 3
BARBARA MARSCHALL, DISTRICT 4
JON ULRICH, DISTRICT 5



December 11, 2012

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

Re: Southwest Transitway Draft Environmental Impact Statement

On behalf of the Scott County Board of Commissioners, I am hereby submitting the following comments regarding the Draft Environmental Impact Statement (DEIS) for the Southwest Transitway Light Rail Transit (LRT) line. Scott County supports the continued analysis and implementation of the Locally Preferred Alternative (LPA) to provide a regionally significant transit corridor for residents and businesses in the southwest metropolitan area.

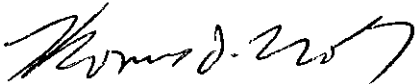
The 2030 Transportation Policy Plan has a 2030 goal of doubling transit ridership and a 2020 goal of a 50% ridership increase. The implementation of the Southwest Transitway will provide a significant investment to improve ridership opportunities and make transit more attractive for travelers in the southwest metropolitan area. However, we find that there are some additional opportunities not discussed in the DEIS that could further increase ridership and meet regional transportation policies of providing an integrated transit network. We are concerned that LRT connections to express bus service along TH 169 have not been fully addressed. In addition, the document does not discuss any future connections or impacts to the potential Dan Patch commuter corridor between Minneapolis and Northfield. Please consider the following comments regarding these concerns.

- The DEIS does not reference any recommended connections of the Southwest Transitway LRT to TH 169, an Express Bus Corridor with Transit Advantages. There are five proposed stations in the vicinity of TH 169 (Golden Triangle, City West, Opus, Downtown Hopkins, Blake Road) that could be accessed by express bus service along TH 169. All five LRT stations are planned to include Park and Ride facilities. However the DEIS does not identify which stations, if any, would be utilized for express bus service connections along TH 169.

- The DEIS also does not mention any transit advantage opportunities along TH 169 to provide quick access for express buses to and from any of the LRT stations. LRT station locations and arterial road connections (such as TH 169) should be evaluated to determine efficient routing of transit service from the TH 169 corridor.
- The proposed relocation of freight rail traffic to the CP MN & S and BNSF Wayzata rail lines would redirect freight rail traffic to the Dan Patch Line commuter corridor. The Dan Patch Line is a 40-mile corridor from downtown Minneapolis in Hennepin County, through the west and south suburbs of Hennepin, Scott and Dakota Counties, to the city of Northfield in northern Rice County. In the 1990s the Dan Patch Commuter Rail project was identified in the Twin Cities Metropolitan Commuter Rail System Plan as a Tier 1 Corridor. The DEIS does not evaluate the impacts of an increase in freight rail activity on any future commuter rail opportunities along the CP MN & S and BNSF Wayzata rail lines (Dan Patch Line). The DEIS also does not evaluate opportunities for intermodal connectivity between the Southwest LRT Transitway and the future commuter rail corridor near the planned Louisiana and Wooddale LRT stations.

Providing efficient connections between transit services will ensure that the overall regional transit system functions as a seamless and user-friendly regional network (2030 TPP Strategy 13a). This will help the region achieve its goals in increasing transit ridership. We thank you for your attention to these comments, and welcome your interest in addressing the concerns of Scott County.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Wolf", written in a cursive style.

Tom Wolf
Chair, Scott County Board of Commissioners

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December 11, 2012

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To whom it may concern,

This letter serves to provide notice of Independent School District No. 283's concerns and comments regarding the Draft Environmental Impact Statement (DEIS) prepared for the Southwest Transitway project published on October 12, 2012. The Saint Louis Park Public Schools Board of Education and administration recently reviewed the DEIS and noted that there are several issues that must be addressed during the EIS process that is underway.

On July 21, 2010, the school board unanimously passed a resolution fully supporting the City of Saint Louis Park's resolution 10-70 which, in summary, stipulate certain concerns related to the proposed re-route of freight rail traffic on the current Bass Lake Spur (BLS) alignment to the Minnesota, Northfield and Southern (MNS) tracks which run adjacent to several school district facilities, including our high school. In addition, the school board supported city resolution 10-71 that requests a fair and balanced evaluation of the proposed re-route to the MNS and the co-location of freight and light rail in the Kenilworth corridor. As part of our review of the DEIS, we anticipated an objective comparison of the two freight routes as directed by the Federal Transit Authority in its letter to the Metropolitan Council on September 2, 2011. We are disappointed to see that the criteria used to evaluate the two options were generally not equal and on several key points absent. These items will be covered in our comments below.

A member of the school board represented the district on Hennepin County Regional Railroad Authority's Project Management Team (PMT), a group whose stated goal was to study the freight rail re-route and develop the Environmental Assessment Worksheet (EAW). The PMT met multiple times over 12 months and while the intent of this group was to provide input and guidance, we believe the process failed to achieve any collaboration or agreement on mitigation of the MNS re-route of traffic from the Bass Lake Spur. In fact, there were no actionable agenda items at all, not a vote or informal poll. The PMT did not have the opportunity to review draft versions of the EAW prior to its release. Continuing to use that information as the basis of the DEIS' study on the

re-route is suspect. We ask that the environmental effects of the potential increase in freight traffic on the MNS tracks be studied in greater detail. Our concerns in this area are also covered in our comments.

We note that DEIS chapter 10 regarding **Environmental Justice** fails to recognize both St. Louis Park Senior High and Peter Hobart Elementary schools as having significant minority and low-income populations well in excess of the stated Hennepin County average. We feel this is worthy of further study and possible engagement as directed by FTA Circular 4703.1.

Most of our concerns relate to our Senior High School's proximity to the MNS tracks. We have broken our concerns up into five areas: safety, noise, vibration, operations and air quality.

I. Safety

The proposed upgrade of the MNS track to FRA Class 2 (and its 25 mph maximum speed) coupled with the restricted view the train engineer will have around the curves as the train approaches the Dakota Ave and Library Lane crossings will limit the time and distance available for stopping the train in the event of an emergency situation. The existing Right of Way (ROW) limits the view the engineer has of the intersections at Dakota Ave. and Library Lane. For this reason we request that the proposed action include the following mitigations:

A. Grade Separated Pedestrian Crossing at Dakota Avenue.

The DEIS does mention that the MNS separates the high school and the athletic field, however, it fails to note the existence of a McDonald's restaurant directly across the MNS tracks at Dakota Ave. A large number of our students, staff and community frequent this McDonalds.

B. Widen the Right-of-Way (ROW) Along the Track Curves East and Southwest of the High School.

Widening the ROW gives the train operating personnel more time to react to potentially dangerous situations at the Dakota Avenue and Library Lane crossings of the MNS.

C. Below Grade Pedestrian Crossing at 27th Ave.

In addition , we need a safe crossing for students near Peter Hobart Elementary School at the north end of the Freight Re-route study area, This below grade crossing would provide a safe, direct route for students who live east of the MNS track.

II. Noise

DEIS Section 4.7.5 starting on page 4-99 regurgitates the information from the vacated EAW.

While the addition of Quiet Zone (QZ) crossings at the Dakota Ave and Library Lane intersections and welded rail will theoretically reduce noise, the reality of the quiet zones with their blind corners and higher speed trains adjacent to the High School, train engineers will choose to sound the horn.

Completely missing in the DEIS analysis are calculations for the noise generated by more frequent, longer, heavier trains (assumptions, page 4-99) using multiple locomotives at increased throttle climbing the projected .86% grade (east bound) or 1.2% grade (west bound).

Table 4.7-14 indicates that there will be a net gain in noise based on just the combined traffic of the current CP and TCW operations, where on page 4-99 the DEIS states it is a conservative estimate. This does not take into account any growth in either of these companies' operations. Any prediction for future operational levels would likely indicate growth. We need to see future noise estimates with 10 and 20 year projections of future rail operations to make reasonable judgments about noise impact.

Average noise over a 24 hour period is not what brings the learning process in a classroom to a complete halt. It is the intermittent noise of train for extended periods of time that would affect the classroom work. For this reason, we desire the following mitigations considered as part of the proposed action:

A. Eight New Classrooms on North Side of Existing High School Building

Due to increased noise and its impact on the learning process replacing the classrooms that face south towards the MNS that are most affected by the train noise with classrooms along 33rd St would alleviate any pressure to use these rooms as classrooms. We anticipate growth due to the success of our innovative programs.

B. New Windows and Air Conditioning Throughout High School

This mitigates the increased noise for the rest of the high school.

C. Create Southbound Connection from BLS to MNS

This eliminates the need to use the area adjacent to the high school as a de facto wye for westbound trains on the BLS headed south.

D. Railroad Construction only during the Summer Months

Restricting heavy construction to summer months when school is not in session would eliminate additional classroom disruptions.

III. Vibrations

Currently, we experience problems with recently installed, ceiling mounted projection equipment in classrooms in the south part of the high school due to vibrations from passing trains. We anticipate greater problems with the increased frequency of longer, heavier trains. We look forward to further detailed analysis of vibration during the Preliminary Engineering phase of the project mentioned on page 4-118 and working to minimize the impacts at the High School site. We recommend the following mitigations for vibrations as part of this project:

- A. Replace or Upgrade Projection Equipment in Affected Classrooms**
- B. Concrete Ties, Rubber Boots and Pads for MNS Track**

IV. Operations

We anticipate that the proposed action will cause several operational difficulties. Our current bus movements between the High School and Park Spanish Immersion (PSI) School as described in detail on page 6-38 are part of a tiered busing schedule that uses the same buses multiple times each morning and afternoon with a tight time schedule. In the description, the author uses the fact that in the afternoon 30 buses load at PSI and then all travel to the High School, crossing Lake Street and the MNS on Library Lane to determine the queuing of vehicles on Lake Street while a police officer stops traffic. There is then discussion of the traffic volumes during a potential 12.5 minute train blockage. This completely misses the point that a train blocking our bus movements at that time of day would severely delay our bus transportation for not only those students, but the delays would ripple through the rest of the schedule.

We suggest the following mitigations be implemented to minimize impacts to our daily operations:

- A. North Highway 7 Frontage Road Below Railroad Bridge Over Hwy 7**

This creates a path for current afternoon bus traffic to cross under the MNS line regardless of train operations.

- B. Restrict Railroad Operations During AM and PM Bus Times**

A one hour window in the morning and a 30 minute window in the afternoon would enable busses, students and staff to move efficiently to and from schools.

- C. Quiet Zones Designed to Allow Un-restricted Access to our South Parking Lot**

We require vehicle access to our South Parking Lot remain as it is today with access from northbound and southbound Dakota Avenue to and from the lot and similar access on Library Lane.

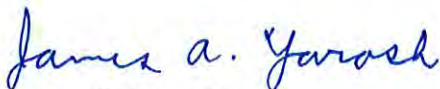
V. Air Quality

The DEIS included no evaluation of Air Quality on the re-route segment for a variety of reasons explained on page 4-72. We still anticipate issues with multiple locomotives pulling extended trains up the steep grades proposed on the MNS re-route creating temporary air quality issues in our high school building which is located just 75' from the MNS tracks. Mitigation for this issue would be the same items A & B covered under section II. Noise: new windows and air conditioning.

We certainly look forward to "further discussion" as mentioned frequently throughout the DEIS and would welcome a presentation by the Met Council regarding the project and freight rail issue. We have serious concerns regarding this project and expect the aforementioned mitigations are put into place if the project proceeds with the re-route.

Sincerely,

ST. LOUIS PARK BOARD OF EDUCATION



James A. Yarosh
Chair, Board of Education
Independent School District 283
St. Louis Park, MN



Dr. Debra Bowers
Superintendent
Independent School District 283
St. Louis Park, MN

cc: Jeffrey Jacobs, Mayor, St. Louis Park
Tom Harmening, City Manager, St. Louis Park
Jim Brimeyer, Representative, Met Council
Jennifer Munt, Representative, Met Council
Gail Dorfman, Commissioner, Hennepin County
Steve Simon, Representative, MN House
Ryan Winkler, Representative, MN House
Ron Latz, Senator, MN Senate
Keith Ellison, Representative, US House
Amy Klobuchar, Senator, US Senate
Al Franken, Senator, US Senate



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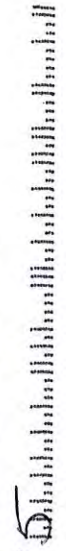


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B. Widen the Right-of-Way (ROW) Along the Track Curves East and Southwest of the High School.

Widening the ROW gives the train operating personnel more time to react to potentially dangerous situations at the Dakota Avenue and Library Lane crossings of the MNS.

C. Below Grade Pedestrian Crossing at 27th Ave.

In addition , we need a safe crossing for students near Peter Hobart Elementary School at the north end of the Freight Re-route study area, This below grade crossing would provide a safe, direct route for students who live east of the MNS track.

II. Noise

DEIS Section 4.7.5 starting on page 4-99 regurgitates the information from the vacated EAW.

While the addition of Quiet Zone (QZ) crossings at the Dakota Ave and Library Lane intersections and welded rail will theoretically reduce noise, the reality of the quiet zones with their blind corners and higher speed trains adjacent to the High School, train engineers will choose to sound the horn.

Completely missing in the DEIS analysis are calculations for the noise generated by more frequent, longer, heavier trains (assumptions, page 4-99) using multiple locomotives at increased throttle climbing the projected .86% grade (east bound) or 1.2% grade (west bound).

Table 4.7-14 indicates that there will be a net gain in noise based on just the combined traffic of the current CP and TCW operations, where on page 4-99 the DEIS states it is a conservative estimate. This does not take into account any growth in either of these companies' operations. Any prediction for future operational levels would likely indicate growth. We need to see future noise estimates with 10 and 20 year projections of future rail operations to make reasonable judgments about noise impact.

Average noise over a 24 hour period is not what brings the learning process in a classroom to a complete halt. It is the intermittent noise of train for extended periods of time that would affect the classroom work. For this reason, we desire the following mitigations considered as part of the proposed action:

A. Eight New Classrooms on North Side of Existing High School Building

Due to increased noise and its impact on the learning process replacing the classrooms that face south towards the MNS that are most affected by the train noise with classrooms along 33rd St would alleviate any pressure to use these rooms as classrooms. We anticipate growth due to the success of our innovative programs.

B. New Windows and Air Conditioning Throughout High School

This mitigates the increased noise for the rest of the high school.

C. Create Southbound Connection from BLS to MNS

This eliminates the need to use the area adjacent to the high school as a de facto wye for westbound trains on the BLS headed south.

D. Railroad Construction only during the Summer Months

Restricting heavy construction to summer months when school is not in session would eliminate additional classroom disruptions.

III. Vibrations

Currently, we experience problems with recently installed, ceiling mounted projection equipment in classrooms in the south part of the high school due to vibrations from passing trains. We anticipate greater problems with the increased frequency of longer, heavier trains. We look forward to further detailed analysis of vibration during the Preliminary Engineering phase of the project mentioned on page 4-118 and working to minimize the impacts at the High School site. We recommend the following mitigations for vibrations as part of this project:

- A. Replace or Upgrade Projection Equipment in Affected Classrooms**
- B. Concrete Ties, Rubber Boots and Pads for MNS Track**

IV. Operations

We anticipate that the proposed action will cause several operational difficulties. Our current bus movements between the High School and Park Spanish Immersion (PSI) School as described in detail on page 6-38 are part of a tiered busing schedule that uses the same buses multiple times each morning and afternoon with a tight time schedule. In the description, the author uses the fact that in the afternoon 30 buses load at PSI and then all travel to the High School, crossing Lake Street and the MNS on Library Lane to determine the queuing of vehicles on Lake Street while a police officer stops traffic. There is then discussion of the traffic volumes during a potential 12.5 minute train blockage. This completely misses the point that a train blocking our bus movements at that time of day would severely delay our bus transportation for not only those students, but the delays would ripple through the rest of the schedule.

We suggest the following mitigations be implemented to minimize impacts to our daily operations:

- A. North Highway 7 Frontage Road Below Railroad Bridge Over Hwy 7**

This creates a path for current afternoon bus traffic to cross under the MNS line regardless of train operations.

- B. Restrict Railroad Operations During AM and PM Bus Times**

A one hour window in the morning and a 30 minute window in the afternoon would enable busses, students and staff to move efficiently to and from schools.

- C. Quiet Zones Designed to Allow Un-restricted Access to our South Parking Lot**

We require vehicle access to our South Parking Lot remain as it is today with access from northbound and southbound Dakota Avenue to and from the lot and similar access on Library Lane.

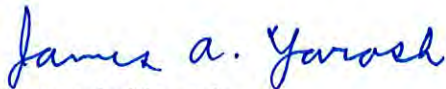
V. Air Quality

The DEIS included no evaluation of Air Quality on the re-route segment for a variety of reasons explained on page 4-72. We still anticipate issues with multiple locomotives pulling extended trains up the steep grades proposed on the MNS re-route creating temporary air quality issues in our high school building which is located just 75' from the MNS tracks. Mitigation for this issue would be the same items A & B covered under section II. Noise: new windows and air conditioning.

We certainly look forward to "further discussion" as mentioned frequently throughout the DEIS and would welcome a presentation by the Met Council regarding the project and freight rail issue. We have serious concerns regarding this project and expect the aforementioned mitigations are put into place if the project proceeds with the re-route.

Sincerely,

ST. LOUIS PARK BOARD OF EDUCATION



James A. Yarosh
Chair, Board of Education
Independent School District 283
St. Louis Park, MN



Dr. Debra Bowers
Superintendent
Independent School District 283
St. Louis Park, MN

cc: Jeffrey Jacobs, Mayor, St. Louis Park
Tom Harmening, City Manager, St. Louis Park
Jim Brimeyer, Representative, Met Council
Jennifer Munt, Representative, Met Council
Gail Dorfman, Commissioner, Hennepin County
Steve Simon, Representative, MN House
Ryan Winkler, Representative, MN House
Ron Latz, Senator, MN Senate
Keith Ellison, Representative, US House
Amy Klobuchar, Senator, US Senate
Al Franken, Senator, US Senate

St Louis Park Public Schools

ess, one student at a time.

ark Public Schools

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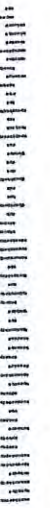
t 33rd Street

ark, MN 55426-3498

**Urgent! Time Sensitive
Southwest Transitway**

RECEIVED
DEC 14 2012
BY:

**Hennepin County
Housing, Community Works & Transit
Attn: Southwest Transitway
701 Fourth Avenue South, Ste 400
Minneapolis, MN 55415**





Meg McMonigal
<mmcmonigal@stlouispark.org>


12/17/2012 04:33 PM

To "swcorridor@co.hennepin.mn.us"
<swcorridor@co.hennepin.mn.us>

cc

bcc

Subject: SW DEIS Comments

History:  This message has been forwarded.

Would you please provide a copy of all of the SW DEIS comments and public hearing comments received thus far and at the end of the comment period to me at the address below?

Thank you!

Meg J. McMonigal
Planning and Zoning Supervisor
City of St. Louis Park
5005 Minnetonka Boulevard
St. Louis Park, MN 55416
952-924-2573
mmcmonigal@stlouispark.org



Elise Durbin
<edurbin@eminnetonka.com>

12/18/2012 11:27 AM

To "swcorridor@co.hennepin.mn.us"
<swcorridor@co.hennepin.mn.us>

cc

bcc

Subject DEIS comments

Attached you will find comments from the City of Minnetonka. We will also be submitting a hard copy in today's mail.

Thank you for the opportunity to comment.

Elise Durbin, AICP
Community Development Supervisor

City of Minnetonka | 14600 Minnetonka Blvd | Minnetonka, MN 55345
p: 952.939.8285 | edurbin@eminnetonka.com



City of
minnetonka

14600 Minnetonka Boulevard Minnetonka, MN 55345 952-939-8200 Fax 952-939-8244

Comment #344
Attachment #1

December 14, 2012

Hennepin County
Housing, Community Works & Transit
ATTN: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

SUBJECT: Southwest LRT DEIS Comments

To Whom It May Concern:

The City of Minnetonka has reviewed the Southwest Transitway Draft Environmental Impact Statement. Attached you will find the city's comments and concerns regarding the Southwest LRT line.

We appreciate the opportunity to review the DEIS, to provide comments, and look forward to continuing to work with you and the Metropolitan Council on this project.

Sincerely,

Julie Wischnack, AICP
Community Development Director

Enclosure

Chapter Two: Alternatives Considered			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
2-32	A total of 250 surface parking spaces are shown at the Shady Oak Road Station	Varying numbers have been proposed previously, but typically it has been 350 parking stalls	More work needs to be completed to better define these numbers. Collaboration between the SWLRT project and the Community Works project needs to occur in order to make sure there is consistency among all components of the project.
2-32	The park and ride locations and size of facilities need to be further explored.	The city anticipates that with the size of the park and ride at the Shady Oak station, the park and ride facility will need to be structured. Access directly off Excelsior Boulevard may cause congestions and an alternate access must be explored for consideration.	The exact location of the park and rides and potential for shared parking with the surrounding development, as well as the exact size, and whether the facility is surface or structure must be explored further as part of the project.
2-50 to 2-51	Traction Power Substations, Signal Bungalows, and any other signal cabinets	Location, design, placement and screening is unknown.	The location, placement, and screening of the Traction Power Substations and other signal cabinets must be closely coordinated with the City of Minnetonka. This equipment must be located, screened, and designed as appropriate to avoid impacts to existing and future developments.
2-53	No mention that Minnetonka is an opt-out community	While Minnetonka is an opt-out that utilizes Metro Transit for its service, it has a contract to do so. If the contract were to be cancelled, then the bus services may be modified.	Add language or acknowledge Minnetonka's status as an opt-out community

Chapter Three: Social Effects			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
3-7	Land Use descriptions along the corridor	There is no mention as to when the land use plan used to describe this section was adopted.	As land use plans periodically change, it is important to note which year the plan was adopted that was used for this evaluation.
3-23	In the City of Minnetonka Comprehensive Plan, the summary lists the Golden Triangle	The Golden Triangle is located in Eden Prairie- not Minnetonka.	The words Golden Triangle should be removed and replaced by Opus.
3-23	Table on page 3-23	The City of Minnetonka section summary inaccurately describes the Opus area as the Golden Triangle.	Change to reflect "Opus Area"
Section 3.2	Neighborhood Community Services and Community Cohesion Impacts	This section contains relevant community information and data. The data is however, not translated into how any of the LRT alignments would affect local community services or cohesion. In alignment LRT 3A, the Opus and Shady Oak area, in particular, would generally be underserved but ready for additional opportunities. The LRT 1A alignment, Rowland and Highway 62 station area in Minnetonka would likely disrupt community services and cohesion. The planning for additional impacts around these stations is not planned in the City's comprehensive plan.	Show how LRT alignments would affect local community services or cohesion.

3-38	Mitigation during the construction period	The DEIS states that more specific plans will be developed later for mitigation for businesses and residents. Because of the length of time for construction it is important that these plans are thoroughly developed and communicated before construction begins.	As plans are developed, consult with local businesses and residents about the plans to make sure they are on track. Once plans are developed and during construction, clearly communicate them to the businesses and residents. There should be some discussion about support for businesses along the line, such as the "Open to Business" program.
3-57	Segment 3, the DEIS notes that the LRT is not expected to affect community connectivity-- including trails and roadway.	Opus has a pedestrian network of nearly 6 miles of trails. Appendix F shows multiple trail segments being removed as part of the project.	See comments for Appendix F.
3-68	Section 3.3.1 - The last line of the paragraph and the bullet points are in this section and also in Section 3.3.5.	Exact information is duplicate. It seems more appropriate in Section 3.3.5 since 3.3.1 is about legal and regulatory review and 3.3.5 is about acquisition and relocation.	Delete the line and bullet points from section 3.3.1 and leave it in 3.3.5 where it is more appropriate.
3-72	Section heading does not seem appropriate or the subject matter.	While there is some discussion in the section about mitigating or lessening impacts, the main subject matter of the section is Acquisition.	Change the heading of the section to "Acquisition".
3-84 to 3-86	There is a Restrictive Covenant on property PID 3611722210002 which states the property must only be used for parkland and open space purposes.	The current alignment shows LRT through part of this parcel.	Appropriate approvals to have the alignment through this area will need to be obtained from the City of Minnetonka and any other relevant parties.
3-84 to 3-86	The city has a Declaration of Tree Preservation Easement on the property located at 5450 Feltl Road (PID: 3611722220010).	The plan appears to propose track installation and grading as well as realignment of Smetana Rd and Feltl Rd within the easement area.	Appropriate approvals to have the alignment through this area will need to be obtained from the City of Minnetonka and any other relevant parties.
3-84 to 3-86	The city has a Conservation Easement on the property located at 5101 Nolan Drive (PID: 2611722440106).	The plan appears to propose a bridge through the east side of the conservation easement.	Appropriate approvals to have the alignment through this area will need to be obtained from the City of Minnetonka and any other relevant parties.

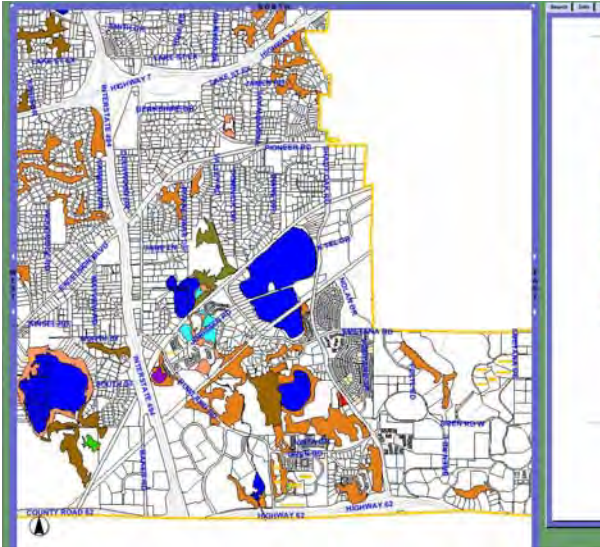
<p>3-112</p>	<p>"North of Smetana Road the alignment is on a bridge to cross over ponds and existing freight rail lines. The proposed structure, along with catenary poles and wires, could have substantial visual impacts on sensitive receptors in the multi-family residential development on the east side of the corridor."</p>	<p>Documents only the multi-family residential on the east side of the LRT alignment north of Smetana Road and the visual impacts to those properties.</p> <p>The rail line, catenary poles and wires will have a negative visual impact, in addition to potential negative environmental impacts, adjacent to the multi-family residential developments to the north (Deer Ridge Townhomes) and South (Claremont) of Smetana Road with LRT 3A. As acquisition of land will be needed to route the corridor through these residential areas, the primary viewers will be residents and Opus trail users. Adjacent to the Claremont, existing vegetation is comprised of high quality tree resources and although mostly deciduous, removal will decrease existing buffering during leaf-on conditions and provide even less buffering during leaf-off season. Although the corridor elevation is lower than the residential buildings south of Smetana Road, attention to aesthetic should not be underestimated.</p> <p>Generally LRT 1A would have negative visual impacts on existing single family residential neighborhoods and Minnesota River Bluffs LRT Regional Trail Users.</p>	<p>Mitigate the additional visual and potential impacts to residential properties.</p>
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Chapter Four: Environmental Effects			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
4-2	Section 4.1.1 The incorrect daily amount was stated under the regulation for a waters appropriations permit.	<p>Per the MN DNR's website Minnesota Statute 103G.265 requires the Department of Natural Resources to manage water resources to ensure an adequate supply to meet long-range seasonal requirements for domestic, agricultural, fish and wildlife, recreational, power, navigation, and quality control purposes. The Water Appropriation Permit Program exists to balance competing management objectives that include both development and protection of Minnesota's water resources.</p> <p>A water use permit from DNR Waters is required for all users withdrawing more than 10,000 gallons of water per day or 1 million gallons per year.</p> <p>There are several exemptions to water appropriation permit requirements: domestic uses serving less than 25 persons for general residential purposes, test pumping of a ground water source, reuse of water already authorized by a permit (e.g., water purchased from a municipal water system), or certain agricultural drainage systems (check with your area hydrologist for applicability).</p>	The accurate number of gallons per day should be reflected in the final EIS.

<p>4-21, 4-23, 4-24 and page 196 of appen dix H</p>	<p>Ensure that any permanent water removal does not result in negative impacts to ground water or surface waters.</p>	<p>Sections 4.1.4.2 - States there is a possible need for permanent water removal at both segments 1 and 3 and possibly a second area.</p> <p>Mitigation sections (4.1.6) lists methods to minimize impacts and Appendix H (page 196) indicates the permanent water removal or the cut below the water table will not impact wells since the closest well is at least 800 feet away. It further states that if water is diverted into or away from wetlands that the work will be engineered to minimize the impacts.</p>	<p>The engineering should be designed to prevent any impacts versus minimizing them.</p>
<p>4-24 to 4-44</p>	<p>Section 4.2, Water Resources, does not recognize Minnetonka's ordinances or regulation as it relates to wetlands, floodplains, shorelands, storm water management or grading and erosion control except in Table 4.2-1 which identifies Minnetonka as being the LGU under the WCA and references Minnetonka's role in project review and approval.</p> <p>It should also be noted that the city has a tree protection ordinance.</p>	<p>Appropriate permits must be acquired and mitigation strategies must follow the city's rules. For example Section 4.2.2.2 on page 4-32 discusses mitigation strategies for impacts to wetlands. Since the DEIS does not recognize that Minnetonka has a wetland ordinance that requires wetland mitigation in the amount of 1:1 for any amount of wetland fill (no De minimis), wetland mitigation is not mentioned as a strategy to offset the impacts.</p>	<p>Section 4.2.1.5--Local: Cities (page 4-28) - speaks in detail to Eden Prairie's regulation and mentions Mpls', Minnetonka's and St. Louis Park's. This section should be more developed to recognize each community's regulation to ensure appropriate planning and compliance. For example, Minnetonka has a grading and erosion control ordinance triggered by land disturbance of area encompassing 5,000 square feet or 50 cubic yards, that requires compliance with specific standards and the installation and maintenance of best management practices.</p> <p>The city's floodplain ordinance does not allow compensatory water storage to be located in an area of regulated trees. The city views the removal of trees to provide compensatory water storage as a mismanagement of natural resources.</p>

			<p>Section 4.2.2.1 100-year Floodplain (page 4-30) and Figure 4.2-2 (page 4-31) does not recognize the city's 100-year flood areas. This is problematic if fill or alteration occurs.</p> <p>Figures 4.2-3 and 4.2-4 and 4.2-5 (pages 4-36 through 4-38) may not have the city's 100-year flood elevations identified.</p> <p>Although tree impacts are not covered in this section it should be noted that Minnetonka has a tree protection ordinance that regulates tree removal and mitigation.</p> <p>Section 4.2.2.2 Wetlands, Streams and Lakes (page 4-32)- Minnetonka's ordinances relating to wetlands and shorelands are not identified and therefore necessary permits at the local level may not be acquired and appropriate mitigation may not occur. As previously stated, Minnetonka has a wetland ordinance that requires any wetland fill to be mitigated at a rate of 1:1, wetland mitigation is not mentioned as a strategy to offset impacts.</p> <p>Table 4.2-2 (page 4-34) Minnetonka should be added as a permitting agency for wetland and floodplain areas.</p> <p>Section 4.2.4 Short Term Construction Effects (page 4-42) Compliance with Minnetonka's regulation and storm water regulation will be required.</p>
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			Section 4.2.5 Mitigation (page 4-43) Recognize local rules so appropriate permitting and compliance can be achieved.
4-28	The City of Minnetonka requires a grading and erosion control permit for land disturbance greater than 5,000 square feet or 50 cubic yards	The City of Minnetonka has a city ordinance requiring such a permit to be obtained	Section 4.2.1.5-- Local: Cities Insert the following language into this section: "The City of Minnetonka requires a grading and erosion control permit for land disturbance activities that are greater than 5,000 square feet or 50 cubic yards."
4-30	The City of Minnetonka's Water Resource Management Plan (WRMP) has identified and regulates additional floodplain areas, outside of FEMA floodplain	The City of Minnetonka has a Floodplain District ordinance requiring floodplain areas identified by FEMA and the city's WRMP be regulated. The ordinance requires any fill be mitigated at a one to one ratio. The 100-year floodplain areas mapped under the city's WRMP can be obtained on the city's website or via a request for the city's GIS layer	Section 4.2.2.1 100-year floodplain and Section 4.2.3.1 Floodplains Include floodplain information from the City of Minnetonka's WRMP in the analysis of floodplain impacts.
4-31 and 4-36 through 4-38	Proper identification of forest resources on Figures 4.2-2, 4.2-3 and 4.2-4 and 4.2-5.	It does not appear that the referenced Figures accurately illustrate the deciduous forests, specifically the oak woodland, and brushland behind the Claremont Apartments just north of the proposed Opus station.	Re-evaluate the segments and identify and map the existing forest resources.

<p>4-47</p>	<p>Figure 4.3-1 - It is difficult to see if all of the Minnesota Land Cover Classification System (MLCCS) remnant communities are depicted in this map because the resolution is poor. In Minnetonka there are several areas; a tamarack swamp SE of Glen Lake, semi permanently flooded cattail marsh E of Lake Minnetoga and an oak woodland brushland SW of the Conservatory Apartments. Additionally there are several other emergent wetland communities.</p>	<p>If the MLCCS designated remnant communities are not included, potential impacts and restoration will not be addressed.</p>	<p>Confirm that the MLCCS information is recorded and provide a map with higher resolution or provide maps of these communities for each city so the information can be reviewed.</p> <p>Attached is map reflecting Minnetonka's MLCCS for the area.</p> 
<p>4-52</p>	<p>4.3.3.2 Native Habitats, Table 4.3-1 - In the comments under alternative 3A it is not clear if the MLCCS designation of oak woodland brushland located southwest of the Claremont Apartments and north of the Opus Station is included.</p>	<p>If it is not included potential impacts and restoration will not be addressed.</p>	<p>Confirm that it is recorded in the existing conditions.</p>

4-53	Invasive species management plan mentioned in sections 4.3.3.4 Invasive Species, 4.3.4 Short-Term Construction Effects, and 4.3.5 Mitigation	Minnetonka is involved in restoration activities of natural habitats. The city appreciates the foresight in developing an invasive species management plan and would like to review the final plan.	Provide plan for city review and approval.
4-54 and 4-55	Is the summary depicting the potential impacts for Minnetonka's habitats if the city's existing MLCCS designated remnant communities are not accurately reflected in the existing conditions?	If the communities are not accurately included potential impacts and restoration will not be addressed.	Confirm that Minnetonka's MLCCS designated remnant communities are accurately recorded in the existing conditions.
4-61	Section 4.4.4 Long-Term Effects, the tamarack swamp located SE of Glen Lake is not identified.	If it is not identified how will the impacts be evaluated?	Determine if the alignment for LRT 1A will have any potential impacts to this resource.
4-103	Noise related to horns and bells at all at-grade crossings	Impacts to adjacent residents.	Quiet zones should be considered for implementation at all at-grade crossings to eliminate noise from bells and horns.
4-103 to 4-104	"Construction contractors <i>should</i> be required to develop a noise mitigation plan" and discusses what should be included.	The plan MUST be developed and include requirements from the city.	City must be involved in approval of the Construction Noise Mitigation Plan steps and approvals prior to work beginning.
4-118	DEIS references final EIS that is not yet completed.	Mitigation measures will be based on this document.	City needs an opportunity to review and provide input on findings.
4-119 and 4-127	On-going maintenance practices associated with light rail.	Section 4.9 discusses Hazardous and Contaminated Materials. The collection and disposal of oils, grease and other wastes is documented in the Draft EIS. Will salt be used during winter snow removal operations? If so, how will the amounts be monitored? Both Minnehaha and Nine Mile Creek are chloride impaired so salt use may be an issue.	Address the use of salt in the final document.

Chapter Five: Economic Effects			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
Section 5.2	Station Area Development	Environmental Metrics – Concur with the report that LRT 1A is inconsistent with the Minnetonka Comprehensive Plan. If selected, recreating transit-friendly station areas west of the Shady Oak Station would pose significant challenges given the existing land use pattern and transportation systems.	None—concur with the report.
Section 5.2	Station Area Development	Environmental Metrics – LRT 1A and 3A for Shady Oak Station Area. The Short-term impacts described in Section 5.2.2 make no mention that this station is essentially “land-locked” by private land holdings. The document does not identify in any generality how these issues impact station area development.	Access and landownership issues identified in the DEIS will need a resolution in order for the Shady Oak station to come on-line.

Chapter Six: Transportation Effects			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
6-53	Figure 6.3-2 does not reflect all trails in Opus and along Shady Oak Road.	The Opus trails need to be documented as they are important for connectivity to/from the proposed station and the businesses and residential in the area. The LRT will impact some of these trails as shown in Appendix F.	Document all trails.

Chapter Nine: Indirect Effects and Cumulative Impacts			
Page	Issue	Why is this an issue	Proposed alterative/mitigation
9-37, 9-38, 9-39	DEIS states that no mitigation is required for Transit Effects, Effects on Roadways and Other Transportation Effects including trails.	Effects to local transportation systems affected by the Southwest LRT must be included as a part of the overall study for potential improvements needed to eliminate increased congestion and impacts. DEIS states that because the indirect effects and cumulative impacts are expected to be beneficial, no mitigation is needed. Impacts could require substantial dollars for improvements.	Study area limits must be reviewed and defined with the city to determine overall impacts to local infrastructure systems.

Chapter Twelve: Public Agency Coordination and Comments			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
12-4 and 12-15	Minnetonka has regulations not identified in Table 12.2-2 Preliminary List of Required Permits. These include wetland, floodplain, shoreland, erosion control, steep slope and tree protection ordinance as well as stormwater regulation.	The appropriate permits may not be acquired at the local level.	Include the above referenced Minnetonka items in the list of permits to be obtained.

Appendix F- Part 1: Conceptual Engineering Drawings			
Page Number	Issue	Why is this an issue	Proposed alternative/mitigation
38	The SWLRT alignment must go under (cut and cover) TH 62 rather than go over TH 62 as proposed.	<p>Going over TH 62 would:</p> <ol style="list-style-type: none"> 1) Limit the city's flexibility with much needed local roadway improvements and potential realignments within the Opus II Business Park. 2) Provide for a non-desirable connection and layout for the City West Station in the City of Eden Prairie due to existing topography. 3) Eliminates the opportunity to provide a trail linkage between the Opus II Business Park and the United Health Group Campus (located on the south side of TH 62). Having an elevated track through this area would preclude this opportunity. 	The SWLRT alignment must go under (cut and cover) TH 62 rather than go over TH 62 as proposed.
38-39	Design refinements must shift the SWLRT alignment of the line slightly to the south/west near TH 62.	The city, MnDOT and property owners within Opus II Business Park have made significant investments in making transportation improvements to the interchange at US 169 and Bren Road. In the long term additional access into and out of the business park will be needed in order to provide acceptable Level of Service (LOS) at the existing interchange. One option suggested for consideration by MnDOT was a set of ramps from TH 62 into the Opus Business Park. The ramps would be for westbound traffic entering the site and for eastbound traffic leaving the site. The alignment shown for SWLRT in this area would preclude constructing these ramps in the future.	Shift the SWLRT alignment slightly to the south and west to allow for the ramps to be constructible in the future and not interfere with light rail operations.

39	Minnetonka agrees with the recommendation eliminating the trail crossing of the light rail line and Red Circle Drive south of Opus station, however the limits must be revised.	A portion of the trail located at the western edge of the property, west of the proposed alignment, must remain to maintain connectivity. Without this segment, it removes connectivity on the west side and increases the travel distance of pedestrians and bicyclists from the station to properties southwest.	Leave a portion of trail in place near Red Circle Drive currently shown for removal. It will allow construction of a parallel trail connection on the west side of the SWLRT line in the future.
39	The DEIS does not indicate how the new trail segment proposed to connect Opus station to the trails west of the north-south segment of Bren Road East will cross.	With the expected increase in traffic volumes on the roadways and additional pedestrian foot traffic, the city is concerned that an at-grade crossing in this location could pose a safety challenge.	A grade separated crossing of the roadway for the trail crossing at this location, and all others must be proposed within the Opus II Business Park.
39	For the trail area north of Bren Road W and the Opus station, the DEIS shows removal of trail segments west of the LRT alignment near Bren Road. The trail removal eliminates connection to properties east of the LRT line creating a gap between the underpass at Bren Road West and the trail network along Green Circle Drive.	The SWLRT project creates a trail gap without constructing a parallel north-south trail segment on the east side of the transit line. Connectivity that existed prior to the project would not be maintained.	As part of the preliminary design and FEIS, Metro Transit must replace the trail on the east side to bring more parcels and properties into a half mile walk and a two mile bike of Opus station. All trail segments proposed for removal and replacement as a part of the project must be reviewed to maintain connectivity that existed prior to the project.
40	The proposed LRT crossing and intersection reconfiguration at Smetana Road and Feltl Road is not acceptable.	The proposed reconfiguration switches the through movement of Smetana Road, the higher functionally classified roadway with heavier traffic volumes, to Feltl Road, the roadway with lower functional class and lower traffic volumes. It also creates additional SWLRT crossings that could be reduced.	There are other alternatives available that would preserve the alignment and through movement of Smetana Road, yet limit the number of at-grade crossings. The city requires that the FEIS and preliminary engineering develop and evaluate other concepts for this intersection acceptable to the city.

42	The curve of the alignment just west of the Shady Oak station (curve taking the alignment to the south)	The city has been informed that this curve may change in the future, which will impact redevelopment plans for the area.	Changes in the alignment from what is shown in the DEIS should immediately be discussed with the city and the city reserves the rights to provide comments on the new alignment.
Appendix F page 42-43	The proposed location of the Shady Oak station platform is currently landlocked as it exists today. The city assumes that 17 th Avenue in Hopkins will need to be expanded south as part of the project in order to access the station.	The city has identified secondary access points into the station area as a key issue, as one access point is likely unable to accommodate the anticipated demand of this station.	Secondary access points from 47 th Street West, 5 th Street/K-Tel Drive and Shady Oak Road should be considered, as well as how the reconstruction of Shady Oak Road from Excelsior Boulevard to Highway 7 will function given the proximity to the station.

Appendix H – Part 1: Supporting Technical Reports and Memoranda			
Page	Issue	Why is this an issue	Proposed alterative/mitigation
4-21, 4-23, 4-24 and page 196 of appendix H	Ensure that any permanent water removal does not result in negative impacts to ground water or surface waters.	<p>4.1.4.2 - States there is a possible need for permanent water removal at both segments 1 and 3 and possibly a second area.</p> <p>Mitigation sections (4.1.6) lists methods to minimize impacts and Appendix H (page 196) indicates the permanent water removal or the cut below the water table will not impact wells since the closest well is at least 800 feet away. It further states that if water is diverted into or away from wetlands that the work will be engineered to minimize the impacts.</p>	The engineering should be designed to prevent any impacts versus minimizing them.



Christa.Stoebner@stb.dot.gov

12/19/2012 09:35 AM

To swcorridor@co.hennepin.mn.us

cc Maya.Sarna@dot.gov, Christopher.VanWyk@dot.gov,
Vicki.Rutson@stb.dot.gov

bcc

Subject Comments on the Southwest Transitway DEIS

The Surface Transportation Board's comments on the Southwest Transitway DEIS are attached. We also mailed a copy of our comments to Katie Walker and Marisol Simon.

(See attached file: Dec 19 2012 Letter to Hennepin County.pdf) (See
attached file: Southwest Light Rail in Minneapolis DEIS STB Comments Dec
19.docx)

Christa Stoebner
Surface Transportation Board
Office of Environmental Analysis
202.245.0299



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

December 19, 2012

Katie Walker, Senior Administrative Manager
Hennepin County Housing, Community Works & Transit
Attn: Southwest Transitway
701 Fourth Avenue South, Suite 400
Minneapolis, MN 55415

RE: Comments on the Draft Environmental Impact Statement, Southwest
Transitway Project in Minneapolis

Dear Ms. Walker:

Thank you for providing the Draft Environmental Impact Statement (Draft EIS) for our review and comment. As you know, the Surface Transportation Board (Board) is currently involved as a cooperating agency in this environmental review because the Board may have a licensing role over certain aspects of the proposed Southwest Light Rail Project. Our comments on the Draft EIS are attached for your review. If you have any questions or need any further information, please do not hesitate to contact me or Christa Stoebner of my staff by telephone at (202) 245-0299 or email at christa.stoebner@stb.dot.gov. We look forward to working with you in the near future.

Sincerely,

Victoria Rutson
Director

Office of Environmental Analysis

Cc: Marisol Simon, Regional Administrator, FTA, Region V
Maya Sarna, FTA

**SURFACE TRANSPORTATION BOARD
COMMENTS ON THE
SOUTHWEST TRANSITWAY PROJECT
DRAFT EIS**

Board Jurisdiction

Light Rail Transit Line

The proposed construction and operation of a 15-mile light rail transit line connecting downtown Minneapolis to the cities of St. Louis Park, Hopkins, Edina, Minnetonka, and Eden Prairie would not require a license from the Board because the Board does not have jurisdiction over intrastate transportation that is not part of the interstate rail network. 49 U.S.C. § 10501(a)(2)(A); see DesertXpress Enters., LLC--Petition for Declaratory Order, FD 34914 (STB served May 7, 2010). The Board also does not have jurisdiction over mass transportation provided by a local governmental authority. 49 U.S.C. § 10501(c)(2).

Trackage Rights

Alternatives 1A, 3A, 3C-1, and 3C-2 would include the rerouting of existing Twin Cities & Western Railroad Company (TC&W) freight rail service from the Canadian Pacific's (CP) Bass Lake Spur and Hennepin County Regional Railroad Authority's (HCRRA) Cedar Lake (Kenilworth Corridor) to the MN&S Subdivision and BNSF Railway Company's Wayzata Subdivision.

- **Discontinuance of Service.** In order to end freight rail service on a line, any carrier with overhead trackage rights on that line would need to seek discontinuance authority from the Board to be relieved of their common carrier obligation. Accordingly, to end its freight rail service on the Bass Lake Spur and/or the Kenilworth Corridor, TC&W would need to seek discontinuance authority by filing either a petition for exemption pursuant to 49 U.S.C. § 10502 or a full application pursuant to 49 U.S.C. § 10903. A full application is used when there are controversial issues needing Board scrutiny, and a petition for exemption may be used if there is not likely to be any controversy, as it is a more streamlined process. While there appears to be public interest and some controversy over rerouting TC&W traffic to the MN&S line that runs through the City of St. Louis Park, there does not appear to be controversy over TC&W's potential discontinuance of freight rail service over the Bass Lake Spur and/or the Kenilworth Corridor; therefore, a full application would not likely be necessary. The Board usually prepares an Environmental Assessment (EA) for a proposed discontinuance of service over a rail line (except for discontinuances of freight service under modified certificates and discontinuances of trackage rights where the affected line will continue to be operated, which are treated as categorical exclusions that do not need an EA). 49 C.F.R. §§ 1105.6(b) and (c).
- **Trackage Rights.** A rail carrier must obtain Board approval to operate over a line owned by another carrier. See 49 C.F.R. § 1180.2(d)(7). HCRRA's December 10, 2012 Memo (Southwest Transitway Draft Environmental Impact Statement Questions and Responses

for Surface Transportation Board) indicates that TC&W currently has trackage rights over CP's MN&S line. If this were not the case, then TC&W would need to obtain trackage rights authority before rerouting freight traffic to the MN&S line. Trackage rights are categorically excluded from NEPA review under the Board's environmental rules at 49 C.F.R. § 1105.6(c)(4).

Rail Line Abandonments and Discontinuance of Service

Although briefly mentioned in Appendix H on page 16, the DEIS does not appear to discuss or evaluate any rail line abandonment. However, HCRRA's December 10, 2012 Memo (Southwest Transitway Draft Environmental Impact Statement Questions and Responses for Surface Transportation Board) indicates that, if freight rail were to be relocated to the MN&S line, then HCRRA would abandon the Kenilworth Corridor tracks and CP would abandon a portion of their tracks along the Bass Lake Spur.

Board authorization is required to abandon or discontinue service over rail lines that are part of the interstate rail network, pursuant to 49 U.S.C. § 10903. Accordingly, if HCRRA and CP plan to abandon these lines, they would both need to seek abandonment authority for their respective rail lines, and TC&W would need to seek discontinuance authority from the Board pursuant to 49 C.F.R. part 1152. If abandonment authority is granted by the Board, an abandonment extinguishes the common carrier obligation for a rail line, and removes the underlying right-of-way from the Board's jurisdiction.

The Board will normally prepare an EA for a proposed abandonment and discontinuance of service over a line (49 U.S.C. § 1105.6(b)). For environmental reviews of rail line abandonments, the Board's role is limited to the anticipated impacts of the abandonment proposal before the agency: the diversion of traffic to other rail lines or transportation modes and the consequences of removing the track and related structures. Iowa Southern R. Co. – Exemption – Abandonment, 5 I.C.C.2d 496, 501 (1989), aff'd, Goos v. ICC, 911 F.2d 1283 (8th Cir. 1990). The Board's environmental and historic rules at 49 C.F.R. §§ 1105.7 and 1105.8 describe the information needed for the Board's environmental and historic review processes. If the Southwest Transitway EIS is not supplemented to include the information that the Board requires in the appropriate chapters, then the Board would conduct a separate environmental and historic review if and when a proposed abandonment is formally filed with the Board.

Improving, Upgrading, or Realigning an Existing Rail Line

Alternative 3A-1 would include the co-location of the proposed light rail line and TC&W freight rail service on reconstructed freight rail tracks on CP's Bass Lake Spur and HCRRA's Cedar Lake (Kenilworth Corridor). According to pages ES-2, ES-8, and 2-41 of the DEIS, the existing freight tracks would need to be reconstructed to meet BNSF design standards for clearance requirements.

Pursuant to 49 U.S.C. § 10901, a rail carrier must seek Board authority to construct a new line of

rail or to extend an existing line of rail. However, Board approval is not required to improve, upgrade, or realign an existing line without extending the territory or markets that the railroad serves. See Tex. & Pac. Ry. v. Gulf, Colo. & Santa Fe Ry., 270 U.S. 266, 278 (1925); BNSF Ry.—Petition for Declaratory Order, FD 35164 et al., slip op. at 8 (STB served May 20, 2009); Union Pac. R.R.—Petition for Declaratory Order—Rehabilitation of Mo.-Kan.-Tex. R.R. Between Jude & Ogden Junction, Tex., 3 S.T.B. 646 (1998); Denver & Rio Grande W. R.R.—Joint Constr. Project—Relocation Over Burlington N. R.R., 4 I.C.C.2d 95, 97 (1987). Based on the information provided, reconstructing CP’s Bass Lake Spur and HCRRA’s Cedar Lake (Kenilworth Corridor) would not require Board approval.

Spur, Industrial, Team, Switching, or Side Track

Board approval is not required to construct or operate spur, industrial, team, switching, or side track (known as “excepted track”), as long as the purpose and effect is not to extend the railroad’s territory. See 49 U.S.C. § 10906. In addition, Board approval is not required for an acquisition, abandonment, or discontinuance of spur, industrial, team, switching, or side track. See 49 U.S.C. § 10906.

There is no single test for determining whether a particular track segment should be categorized as a line of railroad or as excepted track. Rather, the agency and the courts have adopted a case-by-case, fact-specific approach to make this determination. Primarily, the Board looks at the intended use of a track, and at a track’s physical characteristics.

Connecting Track

Whether or not Board authority would be needed for construction of connecting track depends on whether the connection is proposed for operational efficiency (no authority needed) or to allow the carrier(s) to reach new markets (authority needed).

A carrier can build connecting track that falls outside the Board's jurisdiction if it is just for operational efficiency. In this scenario, constructing connecting track would be akin to double tracking or other track improvements that do not typically require Board authority. Conversely, a railroad can build connecting track that falls under the Board's jurisdiction if the connecting track would reach new markets – just as construction of a new mainline to reach new shippers would require Board authority. Board authority to construct connecting track in this circumstance can be obtained in one of two ways:

- a) The class exemption at 49 CFR 1150.36, which applies if the construction is within existing right-of-way or on land already owned by the railroad.
- b) A construction application under 49 U.S.C. 10901, which applies if the construction is not on an existing right-of-way or land owned by the railroad, or a party argues that the class exemption should not apply in a specific case.

If Board authority to construct the connecting track is sought, NEPA applies. For rail line construction projects, OEA may prepare an EIS, but an EA is typically prepared for construction

cases involving connecting track within existing rail rights-of-way or on land owned by connecting railroads. 49 U.S.C. § 1105.6(b)(1).

Two new connections are mentioned in the DEIS: (1) a connection between CP's Bass Lake line and the MN&S line (across the National Lead/Golden Auto Site) and (2) a connection between the MN&S line and the BNSF Wayzata line. (See pages 1-11, 1-12, 2-8, and 2-27). With regard to the connection between CP's Bass Lake line and the MN&S line, HCRRA's December 10, 2012 Memo states that "there will not be any new markets or territory served because of the reroute. TC&W currently has trackage rights on the CP-owned Bass Lake Spur and the MN&S Spur. By using the reroute, the TC&W would exercise existing rights over the MN&S line." While there currently is no direct connection between the Bass Lake line and MN&S line, there is an existing wye track that currently provides a connection from the Bass Lake line to the MN&S line. HCRRA also states that the wye track has historically been used by TC&W to access the Port of Savage. With regard to the connection between the MN&S line and the BNSF Wayzata line, the DEIS states that "the new connection would likely be used, at least in the near term, in a similar manner as the existing connection, which is to access the BNSF Wayzata Subdivision and more efficiently connect to the east side of town. However, the connection would also provide the flexibility to use other routes to get to the various connections that TC&W uses."

Based on the information provided, the connection between the Bass Lake line and the MN&S line would not require Board approval. In addition, it is not likely that Board authority would be needed for the construction of connecting track between the MN&S line and the BNSF Wayzata line, but we need the following additional information to make that determination:

- How long (in miles) would the proposed connecting tracks be?
- Would the proposed line operate in the same manner as the existing one?
- Would the track only be used for overhead traffic or also for local traffic?
- Would any other additional carriers be rerouted to the MN&S line and the proposed connecting track?
- Who owns the land where the connecting track would be constructed?
- Would the proposed connecting track enable carrier(s) to reach new markets or new competitive territory?
- The DEIS states that the connection would also provide the flexibility to use other routes to get to the various connection that TC&W uses. Please be more specific in describing those other routes.

Chapter 1: Purpose and Need for the Proposed Action

Page	Comment
1-8 and 1-9	<p>The core purpose and need for this project is difficult for a reader to find, and is not mentioned until page 1-8. Recommend stating the purpose and need at the beginning of Chapter 1.</p> <p>Under 40 C.F.R. § 1502.13, an EIS shall briefly specify the proposed project’s purpose and need. Even if a longer explanation follows, we recommend that the purpose and need be more clear and succinct.</p> <p>For example, on page 1-8, there is a paragraph that states: “The primary purpose of the proposed project, the Southwest Transitway, is to provide a high-capacity transit connection improving mobility, accessibility, and system linkages to major population and employment centers including Downtown Minneapolis, Chain of Lakes and Recreation Area, Excelsior and Grand, Downtown Hopkins, Golden Triangle Business District, Opus Business Park, and Eden Prairie Center. The proposed project would also provide a high capacity transit alternative to the traffic congestion in the study area and further the implementation of the Metropolitan Council’s 2030 TPP goal to double transit ridership by 2030.” If this is the core purpose and need statement, we recommend stating it on the first page of Chapter 1.</p>

Chapter 2: Alternatives Considered

Page	Comment
2-20	<p>If TC&W’s freight traffic is rerouted to the MN&S corridor, pages 2-20 and 2-27 of the DEIS state that freight traffic on the MN&S line would increase by a maximum of an additional six trains per day and a maximum of 22 additional trains per week. Freight traffic is projected to increase nationwide over the next several years, and traffic forecasts should be available from the relevant freight railroads. That information would be useful to include in the analyses of alternatives that would result in the rerouting of freight traffic over the MN&S line. If freight traffic forecasts for the reroute alternatives are not evaluated as part of the proposed project, it would seem appropriate to consider freight traffic forecasts and any potential impacts in Chapter 9, Indirect Effects and Cumulative Analysis.</p>
2-22	<p>HCRRA’s December 10, 2012 Memo (Southwest Transitway Draft Environmental Impact Statement Questions and Responses for Surface Transportation Board) indicates that, if freight rail is relocated to the MN&S line, then HCRRA would abandon the Kenilworth Corridor tracks and CP would abandon a portion of their tracks along the Bass Lake Spur.</p>

	For alternatives that would include the rerouting of existing TC&W freight rail service to the MN&S line and Wayzata line, please include information about any planned rail line abandonments, including the information required under the Board’s rules at 49 C.F.R. §§ 1105.7(e)(1) and 1105.8.
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Chapter 3: Social Effects

Page	Comment
	Abandonment and discontinuance need to be evaluated. Proposed connecting track between the MN&S line and the BNSF Wayzata line may need to be evaluated.
3-75	The Surface Transportation Board should be included as a consulting agency in the Section 106 review process.
3-77 and 3-78	A Programmatic Agreement (PA) is discussed on pages 3-77 and 3-78, and it would be appropriate for the Surface Transportation Board to be involved in any revision of the PA and to become a signatory to this document.

Chapter 4: Environmental Effects

Page	Comment
	Abandonment and discontinuance need to be evaluated. Proposed connecting track between the MN&S line and the BNSF Wayzata line may need to be evaluated.
4-26	Under Table 4.2-1, “Permitting Agencies, Corresponding Regulatory Responsibilities, and Actions,” the Surface Transportation Board should be listed as a “Permitting Agency.” The Board is an economic regulatory agency that Congress charged with resolving railroad rate and service disputes and reviewing proposed railroad mergers. The Board has jurisdiction over railroad rate and service issues and rail restructuring transactions, such as mergers, line sales, new line construction, and abandonments. Board approval would be required if: <ul style="list-style-type: none"> • TC&W proposes to discontinue service over CP’s Bass Lake Spur and HCRRA’s Cedar Lake (Kenilworth Corridor); • CP proposes to abandon a portion of the Bass Lake Spur and HCRRA

	<p>proposes to abandon the Cedar Lake (Kenilworth Corridor)); and/or</p> <ul style="list-style-type: none"> • The construction of connecting track, if it is determined that the new track(s) would enable carrier(s) to reach new markets or new competitive territory. <p>We have provided a description of the Board’s jurisdiction and actions that require Board authorization with our comments.</p>
	<p>Safety</p> <p>Changes in frequency, weight, speed and volume of trains on the MN&S line may increase safety risks, and there are a number of safety concerns because of sharp turns, steep grades, elevated tracks, narrow right-of-way, at-grade crossings, and schools near the line. Accordingly, it is critically important that any proposed changes to freight rail operations conform to relevant freight rail standards. In addition, increased freight rail traffic near schools and residential areas could have safety implications that warrant mitigation.</p>

Chapter 5: Economic Effects

Page	Comment
	No Comments.

Chapter 6: Transportation Effects

Page	Comment
	<p>Abandonment and discontinuance need to be evaluated.</p> <p>Proposed connecting track between the MN&S line and the BNSF Wayzata line may need to be evaluated.</p>

Chapter 7: Section 4(f) Evaluation

Page	Comment
	The U.S. Department of Transportation regulation known as Section 4(f) is not applicable to Surface Transportation Board actions because the Board is an independent agency. Accordingly, we do not have any comments to submit on Chapter 7.

Chapter 8: Financial Analysis

Page	Comment
	No comments.

Chapter 9: Indirect Effects and Cumulative Analysis

Page	Comment
	If TC&W's freight traffic is rerouted to the MN&S corridor, pages 2-20 and 2-27 of the DEIS state that freight traffic on the MN&S line would increase by a maximum of an additional six trains per day and a maximum of 22 additional trains per week. Freight traffic is projected to increase nationwide over the next several years, and traffic forecasts should be available from the relevant freight railroads. That information would be useful to include in the analyses of alternatives that would result in the rerouting of freight traffic over the MN&S line. If freight traffic forecasts for the reroute alternatives are not evaluated as part of the proposed project, it would seem appropriate to consider freight traffic forecasts and any potential impacts in Chapter 9.

Chapter 10: Environmental Justice

Page	Comment
	No comments.

Chapter 11: Evaluation of Alternatives

Page	Comment
	No comments.

Chapter 12: Public Agency Coordination and Comments

Page	Comment
12-14	Under Table 12.2-2. Preliminary List of Required Permits, the Surface Transportation Board should be included in the list of "Federal Approvals" that may be required because, depending on the alternative selected, certain aspects of this proposed project may require a license from the Board. We have provided a description of the Board's jurisdiction and actions that require

	Board authorization with our comments.
12-16	<p>Under the section 12.2.2 titled “Section 106 Coordination,” the Surface Transportation Board should be: (1) listed as a coordinating agency and (2) included in the Section 106 process.</p> <p>In addition, a Section 106 Agreement is discussed on page 12-16. As a Federal agency with responsibilities under the National Historic Preservation Act (16 U.S.C. 470f), it would be appropriate for the Surface Transportation Board to be involved in the development of this agreement and to become a signatory to this document.</p>



<Maya.Sarna@dot.gov>

12/19/2012 09:38 AM

To <Christa.Stoebner@stb.dot.gov>,
<swcorridor@co.hennepin.mn.us>
cc <Christopher.VanWyk@dot.gov>,
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bcc

Subject RE: Comments on the Southwest Transitway DEIS

Thank you, Christa.

Have a wonderful holiday!

MAYA SARNA

(d) 202.366.5811 | (e) maya.sarna@dot.gov

-----Original Message-----

From: Christa.Stoebner@stb.dot.gov [mailto:Christa.Stoebner@stb.dot.gov]

Sent: Wednesday, December 19, 2012 10:34 AM

To: swcorridor@co.hennepin.mn.us

Cc: Sarna, Maya (FTA); VanWyk, Christopher (FTA); Vicki.Rutson@stb.dot.gov

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