



Southwest LRT (METRO Green Line Extension) Project

Supplemental Draft EIS Comments

Comments from Agencies and Other Public Entities

July 2015

From: [Elise Durbin](#)
To: [swlrt](#)
Subject: SDEIS comments
Date: Tuesday, July 14, 2015 1:28:50 PM
Attachments: [Other_SDEIS comments-City of Minnetonka v1_0.pdf](#)

Please see the attached SDEIS comments from the City of Minnetonka.

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

July 10, 2015

Ms. Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit –Southwest LRT Project Office
6465 Wayzata Blvd, Suite 500
St. Louis Park, MN 55426

Re: Southwest LRT SDEIS Comments

Dear Ms. Jacobson:

The city of Minnetonka has reviewed the Southwest LRT Supplemental 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 SDEIS, to provide comments, and look forward to continuing to work with you on this project.

Sincerely,

Julie Wischnack, AICP
Community Development Director

Enclosure

Executive Summary			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
6	While most maintenance will occur within enclosed structures, some activities may occur outside the buildings.	This has the potential for noise impacts to surrounding businesses and residences.	Develop operating procedures as to which circumstances and days and times (following the city of Hopkins and city of Minnetonka's noise ordinances) as to when outside maintenance may occur.

Chapter Three: Affected Environment, Impacts and Mitigation			
Page	Issue	Why is this an issue	Proposed alternative/mitigation
3-107	The potential for long-term pumping of groundwater and potential risk for contamination.	May not offer the highest reduction of impact or the best impact mitigation strategy to minimize the impacts to our natural environment. Although the OMF is within Hopkins its close proximity to Minnetonka has the potential for negatively impacting the city's natural environments. City staff needs to ensure that the final plans are compliant with the city's regulation as it relates to any potential impact within Minnetonka's jurisdiction.	Although the analysis for the potential of long-term pumping of groundwater and potential risk for contamination will be available in the Final EIS and will comply with MPCA regulation, the city requests details associated with items such as; <ul style="list-style-type: none"> 1) the containment of the contaminated areas before and during construction and mitigation strategies to reduce long-term risk; and 2) mitigation strategies that address the details associated with the potential for long-term pumping of groundwater such as how often is it pumped, and where is it discharged, etc.?

3-110	Correction needed in the document under section 3.3.2.2 item A—The western portion of wetland NM-HOP-13 is within Minnetonka’s jurisdiction and city (city staff field reviewed the boundary). Issue relates to the proposed wetland and wetland buffer fill/disturbance	May not offer the highest reduction of impact or the best impact mitigation strategy to minimize the impacts to our natural environment. Although the OMF is within Hopkins its close proximity to Minnetonka has the potential for negatively impacting the city’s natural environments. City staff needs to ensure that the final plans are compliant with the city’s regulation as it relates to any potential impact within Minnetonka’s jurisdiction.	Appropriate permitting as outlined in the DEIS will need to occur including local permitting and regulation. Minnetonka will have regulatory authority for a portion of wetland NM-HOP-13. All attempts should be made to reduce any impacts to the wetland and buffer areas.
3-111	FEMA and DNR Q3 maps are used for 100-year floodplain areas.	May not offer the highest reduction of impact or the best impact mitigation strategy to minimize the impacts to our natural environment. Although the OMF is within Hopkins its close proximity to Minnetonka has the potential for negatively impacting the city’s natural environments. City staff needs to ensure that the final plans are compliant with the city’s regulation as it relates to any potential impact within Minnetonka’s jurisdiction.	Confirm with the city’s water resources engineer the elevation of the city’s designated 100-year floodplain areas in addition to DNR Q3 and FEMA. Any floodplain alteration or fill located within the city of Minnetonka must comply with the city’s regulation and result in no net fill, floodplain mitigation will be required.
3-111	Although the OMF is within the city of Hopkins, the final plans for stormwater management must adhere to the standards in the city of Minnetonka’s water resources management plan as approved by the city of Minnetonka’s engineer if	May not offer the highest reduction of impact or the best impact mitigation strategy to minimize the impacts to our natural environment. Although the OMF is within Hopkins its close proximity to Minnetonka has the potential for negatively impacting the city’s natural environments. City staff needs to ensure that the final plans	Although the OMF is within Hopkins the final plans should be reviewed and approved by Minnetonka’s engineer if resulting discharge will flow to Minnetonka wetlands. The storm water management plan should include BMPs to address those wastes associated with the long-term management of a rail line such as grease and hydraulic fluid,

	resulting discharge will flow to Minnetonka wetlands.	are compliant with the city's regulation as it relates to any potential impact within Minnetonka's jurisdiction.	spill prevention and mitigation and management techniques and strategies that address more common pollutants such as de-icing salt, phosphorous and suspended solids.
3-115	Erosion and Sediment control plans.	May not offer the highest reduction of impact or the best impact mitigation strategy to minimize the impacts to our natural environment. Although the OMF is within Hopkins its close proximity to Minnetonka has the potential for negatively impacting the city's natural environments. City staff needs to ensure that the final plans are compliant with the city's regulation as it relates to any potential impact within Minnetonka's jurisdiction.	Although the OMF is located within the city of Hopkins, the city of Minnetonka would like to review the final plans and associated BMPs to ensure adequate protection to our adjacent water resources
3-123	Traffic operations analysis criteria does not appear to fully evaluate traffic impacts to the greater areas, but rather only to a small section around the track crossings near the OMF.	Does not look at the traffic impacts in the near the OMF.	Expand and look at a larger area.
3-123	Indicates a 35 second delay on K-Tel Drive and is not definitive that level of service (LOS) will not be LOS E or F.	LOS E or F is not acceptable to the city. It appears, based on this LOS, other intersections will be impacted.	Further information must be provided on how this delay and LOS will impact Shady Oak Road, Excelsior Boulevard, 17 th Avenue and 11 th Avenue.

From: [Corbett, Michael J. \(DOT\)](#)
To: [swlrt](#); [Craig, E. \(DOT\)](#); [Nelson, Douglas \(DOT\)](#); [Jacobson, Nancy \(DOT\)](#); [Crockett, April \(DOT\)](#); [Lutaya, Andrew \(DOT\)](#); [Impola, Lars \(DOT\)](#); [Rauchle, Ronald \(DOT\)](#); [Kelly, Brian \(DOT\)](#); [Shekur, Hailu \(DOT\)](#); [Erickson, Chad \(DOT\)](#); [Lackey, Clare \(DOT\)](#); [Fischer, Jose \(DOT\)](#); [Wasko, Peter \(DOT\)](#); [Dalton, Richard \(DOT\)](#); [Gina Mitteco](#); [Walding, Shawn \(DOT\)](#); [Bly, Lynne \(DOT\)](#); [Spencer, Timothy \(DOT\)](#); [Krom, Daniel \(DOT\)](#); [Henricksen, Jim \(DOT\)](#); [Paul Czech](#); [Pat Bursaw](#)
Cc: [Nill, Victoria \(DOT\)](#); [Tag, Aaron E. \(DOT\)](#); [Sherman, Tod \(DOT\)](#); [Scheffing, Karen \(DOT\)](#); [Owen, Russell](#)
Subject: RE: DEIS15-002 Southwest LRT SDEIS
Date: Tuesday, July 21, 2015 11:37:30 AM
Attachments: [DEIS15-002-SouthwestLRT-SDEIS.pdf](#)

Ms. Nani Jacobson,

Attached is MnDOT's formal comment letter on the Southwest LRT Supplemental Draft Environmental Impact Statement to be entered into the public record. If you have any questions concerning the letter, please let me know.

Michael Corbett, PE

MnDOT Metro Division – Planning
1500 W County Road B-2
Roseville, MN 55113
651-234-7793
Michael.J.Corbett@state.mn.us



Minnesota Department of Transportation
Metropolitan District
Waters Edge Building
1500 County Road B2 West
Roseville, MN 55113

July 21, 2015

Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit – Southwest LRT Project Office
6465 Wayzata Blvd, Suite 500
St. Louis Park, MN 55426

SUBJECT: Southwest Transitway Supplemental Draft EIS
MnDOT Review # DEIS15-002
Hennepin County

Dear Ms. Jacobson:

Thank you for the opportunity to review the Southwest Transitway LRT Supplementary Draft Environmental Impact Statement (SDEIS). Please note that MnDOT's review of this SDEIS does not constitute approval of a regional traffic analysis and is not a specific approval for access or new roadway improvements. As plans are refined, MnDOT would like the opportunity to meet with your agency to review the updated information. MnDOT's staff has reviewed the document and offers the following comments:

Commuter and Passenger Rail

In order to ensure sufficient capacity and maintain operational flexibility at Target Field Station, it may be necessary in the future to extend the tail track that currently exists between Target Field and Royalston Avenue farther to the west. It is MnDOT's understanding that the current design for the Southwest extension of the Green Line LRT will allow the placement of a single track between the LRT alignment and the Cedar Lake bicycle trail. Any future design changes between Royalston Avenue and I-94 should continue to allow the opportunity to construct a single track between Royalston Avenue and the I-94 overpass for future use managing train movements within Target Field Station.

For questions related to these comments, please contact Dan Krom (651-366-3193 or daniel.krom@state.mn.us) in MnDOT's Commuter and Passenger Rail Section.

Noise

It is MnDOT's understanding that further determinations need to be made as to which roadways are exempt under Minnesota Statute 116.07 for the FEIS. In addition, it is understood that further analysis on noise impacts/mitigation would be performed to address applicable MPCA and FTA rules and guidelines.

If you have any questions regarding MnDOT's noise policy, please contact Peter Wasko (651-234-7681 or Peter.Wasko@state.mn.us) in MnDOT's Design Section.

Water Resources

It appears that drainage permits will be required where the LRT corridor crosses and parallels state roads within MnDOT's right-of-way. MnDOT expects these determinations will be made when the final design plan is submitted.

Additional information may be required once a drainage permit is submitted and after a detailed review. MnDOT will not allow an increase in discharge to MnDOT right-of-way. For questions related to these comments, please contact Hailu Shekur (651-234-7521 or hailu.shekur@state.mn.us) in MnDOT's Water Resources Engineering Section.

Design

It is anticipated that all trunk highway impacts will be reviewed and approved through the layout approval process and proposed alterations will use the policy and criteria presented in the MnDOT Road Design Manual. Additional information on MnDOT's Geometric Design and Layout Development process can be found at: <http://www.dot.state.mn.us/design/geometric/index.html>

For questions related to these comments, please contact Nancy Jacobson, (651-234-7647 or nancy.jacobson@state.mn.us) in MnDOT's Design Section.

Right-of-Way and Permits

Any use of or work within or affecting MnDOT right-of-way requires a permit. It is anticipated that more specific impacts to MnDOT right-of-way will be determined during the FEIS and Engineering phases. Permit forms are available from MnDOT's utility website at <http://www.dot.state.mn.us/metro/maintenance/permits.html>. For questions related to permit requirements, please contact Buck Craig, (651-234-7911 or Buck.Craig@state.mn.us) in MnDOT's Permits Section.

Thank you for the opportunity to review the Southwest Transitway LRT Supplementary Draft Environmental Impact Statement.

Sincerely,

Pat Bursaw
MnDOT Metro District Office of Planning, Program Management, and Transit

Copy via Email

Buck Craig, Permits
Doug Nelson, Right-of-Way
Nancy Jacobson, Design
April Crocket, Area Manager
Andrew Lutaya, Area Engineer
Ron Rauchle, Area Engineer
Brian Kelly, Water Resources
Hailu Shekur, Water Resources
Chad Erickson, Traffic
Clare Lackey, Traffic
Lars Impola, Traffic
Tony Fischer, Freeways
Pete Wasko, Noise
Rick Dalton, Environmental Services
Gina Mitteco, Bicycles and Pedestrians
Lynne Bly, Team Transit
Shawn Combs Walding, Team Transit
Tim Spencer, Freight
Dan Krom, Passenger Rail
Jim Henricksen, Planning
Paul Czech, Planning
Karen Scheffing, Planning
Tod Sherman, Planning
Aaron Tag, SPO
Tori Nill, SPO
Russ Owen, Metropolitan Council

From: [Jacobson, Nani](#)
To: [swlrt](#)
Subject: FW: City of Eden Prairie Southwest LRT SDEIS Comments
Date: Tuesday, July 21, 2015 5:06:54 PM
Attachments: [Eden Prairie SDEIS Comment Letter 07-21-2015.pdf](#)

From: Randy Newton [mailto:RNewton@edenprairie.org]
Sent: Tuesday, July 21, 2015 3:46 PM
To: Jacobson, Nani; swlrt
Cc: Lamothe, Craig; Rick Getschow; Robert Ellis; Janet Jeremiah; David Lindahl; Rod Rue; GRP-AllCouncil
Subject: City of Eden Prairie Southwest LRT SDEIS Comments

Nani –

Attached for your reference and review are the City of Eden Prairie’s Southwest LRT SDEIS comments.

Please let me know if you have any questions or need any additional information regarding these comments.

We appreciate the opportunity to comment.

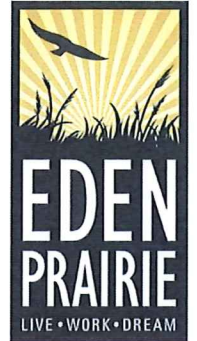
Thank you -

Randy

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

July 21, 2015

Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit – Southwest LRT Project Office
6465 Wayzata Blvd., Suite 500
St. Louis Park, MN 55426



SUBJECT: Southwest LRT SDEIS Comments

Ms. Jacobson:

The City of Eden Prairie has reviewed the Southwest LRT Supplemental Draft Environmental Impact Statement (SDEIS). We appreciate the opportunity to review the SDEIS and respectfully submit the following comments for consideration:

General Comments

- 1) The City of Eden Prairie continues to support an alignment that matches the alignment evaluated in the SDEIS. This includes an end-of-line Mitchell Station located on City Center property and a Town Center Station that is centrally located midpoint between Flying Cloud Drive and Prairie Center Drive as well as Technology Drive and Singletree Lane. The City Council provided Municipal Consent to this plan on July 14, 2014.
- 2) 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 development of Southwest Station plans. Impacts to Southwest Transit's operations during construction of LRT should be minimized.
- 3) The Southwest LRT bridge structure adjacent to Purgatory Creek Park and the Veteran's Memorial will be a primary visual component of the park once constructed. The bridge must be designed with appropriate context and to compliment the park setting and experience. Due to its location and its visual impacts enhanced aesthetic treatment for the bridge should be included in the base project costs. In addition the bridge will permanently impact the park's entry area and signage board located near the Prairie Center Drive / Technology Drive intersection. The Southwest LRT design must restore these park amenities to a similar or better condition.

- 4) The Southwest LRT construction will have temporary impacts to the Purgatory Creek Park and trail system which must be eliminated or minimized and appropriately coordinated with the City of Eden Prairie. The Purgatory Creek Park has a number of programs and events throughout the year that can be scheduled up to a year in advance and have the potential to be impacted by the SWLRT construction. It is imperative that avoiding and minimizing the impacts on these activities be accounted for in the construction schedule. In addition, the loop trail around the Purgatory Creek pond and wetland area is a primary and heavily used recreation amenity within Eden Prairie and its functionality must be maintained throughout construction.
- 5) The grade separated LRT crossing of Valley View Road at Flying Cloud Drive should be refined to eliminate curves. A straightened alignment significantly reduces the SWLRT travel time and has the additional benefit of reducing private property impacts, better coordinating with future improvements in the TH 212 / Valley View Road interchange area, and preserving excess right-of-way for future potential development.
- 6) Should the alignment, number of stations, and parking distribution be modified from the SDEIS, additional analysis should be completed to ensure adequate roadway, parking, sidewalk and trail infrastructure exists to serve the changed traffic patterns and parking demand.
- 7) The location, placement, and screening of the Traction Power Sub-Stations (TPSS), signal bungalows, and other LRT accessory cabinets and equipment must be closely coordinated with the City of Eden Prairie. This equipment must be located, screened, and designed as appropriate to avoid impacts to existing and future developments.
- 8) The project must evaluate alternatives and determine solutions for mitigating design and construction impacts of the project on all businesses, residents, and properties along the corridor. These should include ongoing communication methods such as social media, newsletters, and wayfinding signage. The City should be included as a partner in determining the appropriate solution for the identified impacts.

Detail Comments

- 1) Section 3.2.1.1 (Land Use)
 - a. Planned land uses in the east portion of the segment tend to be office, industrial, and mixed use.
 - b. The location of the proposed Mitchell Station is adjacent to Eden Prairie City Center. The Town Center refers to another area along the alignment farther to the east.
 - c. Eden Prairie has prepared a TOD ordinance that will be proceeding through the

public review process. Adoption of the ordinance is anticipated for August/September 2015.

- 2) 3.2.1.3 (Cultural Resources) - Three areas of archeological potential were identified within the revised Eden Prairie Segment. Evaluation of one site (site C) was completed. There are two remaining sites that have not been evaluated according to the SDEIS. The City of Eden Prairie recommends that the two remaining sites (sites A and B) are fully evaluated and if any of those sites are found to meet NRHP criteria, potential effects to those sites and mitigation measures should be considered.
- 3) 3.2.1.5 (Visual Quality and Aesthetics) - The analysis completed with the SDEIS indicates a decrease in visual quality and aesthetics in nine out of the ten vantage points. The other vantage point maintains the same visual quality and aesthetics as in the original condition. Considering the significant impacts of the project to the built environment of the Eden Prairie community, particularly Purgatory Creek Park, aesthetic improvements such as lighting, structure design elements, and other visual treatments will be essential to maintain the quality of the character of areas adjoining the LRT line. The Southwest Project Office should closely coordinate the design of all architectural and aesthetic elements with the City of Eden Prairie. In addition, the City of Eden Prairie supports and encourages the Southwest Project Office to actively engage in outreach to residents, property owners and other stakeholders regarding the aesthetic design elements of the project.
- 4) 3.2.1.5 (Visual Quality and Aesthetics) - The City does not concur with the conclusion that eight of the ten vantage points evaluated will not have a substantial level of visual and aesthetic impact. As stated above the project is expected to significantly change the built environment within the corridors it is constructed. Aesthetic and visual quality treatments must be primary elements of the SWLRT design in order to best integrate the SWLRT into the existing environment. In particular, the viewpoints adjacent to and within Purgatory Creek Park will have a substantial level of visual and aesthetic impact as SWLRT and the bridge structure along Prairie Center Drive will be a primary visual component of the park once constructed. The bridge must be designed with appropriate context and to compliment the park setting and experience. Due to its location and its visual impacts enhanced aesthetic treatment for the bridge should be included in the base project costs.
- 5) Section 3.2.2.1 Subp. B. (Groundwater) - The SDEIS references our 2004 Wellhead Protection Plan (WHPP), the modeling has since been updated and the draft WHPP (Parts 1 & 2) sent to the MDH for approval. The Draft WHPP has been through all the relevant reviews (local government units and public comment hearings) and has been submitted to the MDH for review and approval. Approval from the MDH is expected soon. The FEIS

should be updated based on the new WHPP as the DWSMA and Wellhead Protection Area have both changed significantly.

- 6) Section 3.2.2.2 Subp. A. (Floodplains) - The SDEIS only references FEMA, but both Nine Mile and Riley-Purgatory-Bluff Creek Watershed Districts have done flood profile modeling and they are both close to finishing Atlas 14 models which could impact the amount of potential floodplain fill. The findings should be incorporated into the FEIS.
- 7) Section 3.2.2.2 Subp. B. (Long-Term Direct and Indirect Water Resources Impacts) - The SDEIS includes the statement that “No additional public watercourses were identified by analysis of MnDNR GIS data for the Eden Prairie Segment.” There are a number of DNR Protected Wetlands on this corridor (including EP-EP-07, EP-EP-15, EP-EP-16 and EP-EP-23 that are listed as being impacted by the project as well as the creeks. These would typically be identified as public waters. The FEIS should include some clarification should be added on what is included in the definition of public watercourses (is it just lakes?). Purgatory and Nine Mile Creeks are listed as public waters later on in some of the discussions under the subtitle of Public Waters, so these should be indicated here to avoid confusion. It would also help if in the Wetlands Section a statement for those that are MnDNR public wetlands or waters was added into the individual paragraphs for each wetland.
- 8) Section 3.2.2.2 Subp. B. (Long-Term Direct and Indirect Water Resources Impacts – Wetlands)
 - a. In the third sentence of the introductory paragraph it is stated that “The total wetlands filled in this segment...” This statement seems to indicate that 16 wetlands would be completely filled, whereas some of them will only be partly filled. The FEIS should state how many would be completely filled and how many would be partially filled to provide better clarity.
 - b. In the list they state that EP-EP-15 is part of a larger wetland complex. However, this is actually 2 distinct areas. The northern piece (City ID 15-13-E) is a constructed wetland mitigation site. The larger, southern piece (15-14-A) is a natural wetland complex (and Purgatory Creek). The discussion for this wetland should indicate that the impacts will occur within that part that is a wetland mitigation area as this will have greater protections that must be dealt with than the remaining wetlands will.
- 9) Exhibit 3.2-5 - There is a map error; DIG-EP-EP-04 and associated impacts are actually north of Technology Drive.
- 10) Section 3.2.2.2 Subp. B. (Long-Term Direct and Indirect Water Resources Impacts – Floodplains) - Calculations for floodplain impacts are based on the FEMA maps only.

The FEIS should re-evaluate based on the Watershed District models once they are completed (for the Final EIS).

- 11) Section 3.2.2.2 Subp. B. (Long-Term Direct and Indirect Water Resources Impacts – Public Waters and Stormwater Management)
 - a. The first paragraph states that Purgatory Creek, a public waterway, would be spanned by the proposed light rail alignment immediately south of where Technology Drive currently spans the creek. However, the next sentence states that the LPA construction limits would be close to Lake Idlewild. This is an error; the Purgatory Creek crossing is not located by Lake Idlewild, but flows between EP-EP-17 and EP-EP-15.
 - b. The fifth paragraph includes the statement “Eden Prairie and the Riley-Purgatory-Bluff Creek Watershed District have stormwater management regulations and program.” This should be corrected in the FEIS to read “Eden Prairie and the Nine Mile Creek and Riley-Purgatory-Bluff Creek Watershed Districts have stormwater management regulations and programs.”
- 12) Section 3.2.2.2 Subp. B. (Short-Term Water Resources Impacts – Public Waters and Stormwater Management) - The SDEIS states that “An MnDNR-certified erosion and sediment control specialist would be employed...” This should be a University of Minnesota certified and/or MPCA approved erosion and sediment specialist.
- 13) Section 3.2.2.2 Subp. C. (Mitigation Measures) - This section indicates that the Section 404 permit application will identify compensatory mitigation and that this plan would be reviewed by the USACE prior to submittal of the Section 404 permit application. However, a compensatory mitigation plan will also need to be submitted to the appropriate Local Government Units for review and approval. The process for this local review and approval of the mitigation measures should be added to this section.
- 14) Section 3.2.2.3 (Noise) – The methodology section indicates that grade crossing bells have the highest level of cumulative noise impact and their potential use in areas of residential land uses must be evaluated and reviewed with the City. Any modification to the proposed LRT operational assumptions and how they impact grade crossings must be accounted for in the updated FEIS analysis and if necessary appropriately mitigated.
- 15) Section 3.2.4.1 Subp. B. (Transit – Long Term Impacts) – The City supports and see benefits in operating Express Bus Service along with LRT from Southwest Station
- 16) Section 3.2.4.2 Subp. B. (Roadway and Traffic) – This section identifies several intersections that are expected to operate at unacceptable level-of-services (LOS E or F) in the build condition without mitigation. Acceptable mitigation strategies must be identified and implemented for each intersection identified. Any modification to the

proposed LRT operational assumptions and how they impact traffic operations must be accounted for in the updated FEIS analysis.

- 17) Section 3.2.4.2 Subp. B. (Roadway and Traffic – Long Term Impacts) – Bulleted list of key changes should indicate that Technology Drive will be converted from a four-lane roadway section to a three-lane section.
- 18) Section 3.2.4.2 (Roadways) - The City has identified through various planning studies and processes the following locations where future roadways and trail/sidewalk crossings of SWLRT may be desired. The potential for these future crossings should be acknowledged:
 - Additional or relocated access for the UHG / Optum campus on Technology Drive
 - A second north-south roadway to the west of the proposed north-south main street and the Town Center Station
 - An east-west roadway south of West 70th Street and the Golden Triangle Station
 - An east-west roadway north of West 70th Street and the Golden Triangle Station
- 19) Section 3.2.4.2 Subp. B. (Roadway and Traffic – Short Term Impacts) – First bullet indicates potential roadway closures for construction of the Flying Cloud Drive / Valley View Road LRT bridge may be necessary. No long term closures of these roadways or any other roadway impacted by LRT construction should be considered. It is understood that weekend or evening closures may be necessary for certain construction activities. These closures must be coordinated with the City and all impacted businesses, residents, and properties.
- 20) Section 3.2.4.2 Subp. B. (Roadway and Traffic – Short Term Impacts) – 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.
- 21) Section 3.2.4.2 and 3.2.4.3 (Roadway and Traffic / Parking) – The parking demand and roadway impacts for end-of-line parking should be planned for in the design of the build project. This is in reference to the statement in Note 20 on page 3-82 that indicates that the structured park-and-ride lot at Southwest Station would increase by approximately 600 spaces if Mitchell Station were eliminated and Southwest Station was the western terminus of the line.
- 22) Section 3.2.4.3 Subp. B. (Parking) – The SDEIS does not identify the parking impacts to the Eden Prairie City Center building (8080 Mitchell Road). There are both short and long term impacts for the property that would need to be mitigated.
- 23) Section 3.2.4.4 Subp. B. (Bicycle and Pedestrian) – The loop trail around the Purgatory Creek pond and wetland area is a primary and heavily used recreation amenity within

Eden Prairie and any closure of this trail would have significant impacts. The functionality of this trail must be maintained throughout construction.

24) Section 3.2.4.4 Subp. B. (Bicycle and Pedestrian) – The design of Southwest LRT should not preclude or increase the cost of providing a direct trail connection between the Prairie Center Drive / Technology Drive intersection and the Southwest Station platform.

25) Section 3.2.4 (Utilities) – The City of Eden Prairie has a number of large diameter collector and distribution water lines within the proposed SWLRT project limits. Shut down of these lines would have a significant impact on the City's water operation and cannot be permitted during the peak demand months. Shut downs to other lines may also need to be restricted. All watermain shut downs must be coordinated with the City and impacted businesses, residents, and property owners. In addition any impacts to sanitary sewer lines and services must also be coordinated with the City and impacted businesses, residents, and property owners.

26) Exhibit F-32 (LRCIs) – LRCIs 5 and 7 should also be shown along Eden Road.

Sincerely,



Rick Getschow
City Manager

CC: Mayor and City Council

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

RESOLUTION NO. 2015-73

**SUBMIT COMMENTS ON THE
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)
FOR THE SOUTHWEST LIGHT RAIL TRANSIT PROJECT**

WHEREAS, the Southwest Light Rail Transit Project is a proposed 16-mile light-rail line serving Eden Prairie, Minnetonka, Hopkins, St. Louis Park and Minneapolis; and

WHEREAS, in response to public comments received on the Southwest Transitway Draft Environmental Impact Statement (DEIS), the Metropolitan Council made changes to the proposed design on the Southwest Light Rail Transit Project; and

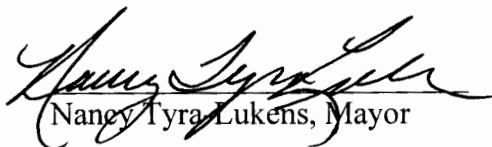
WHEREAS, the Federal Transit Administration and the Metropolitan Council determined that a Supplemental Draft Environmental Impact Statement (SDEIS) is needed to document environmental impacts that were not identified in the DEIS; and

WHEREAS, the Supplemental Draft Environmental Impact Statement (SDEIS) is available for public comment through July 21, 2015; and

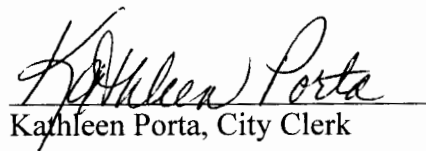
WHEREAS, the City Council appreciates the opportunity to review the SDEIS and desires to respectfully submit comments on the SDEIS.

NOW, THEREFORE, BE IT RESOLVED that the Eden Prairie City Council authorizes the City Manager to submit comments on the SDEIS consistent with the Council Agenda Memorandum during the SDEIS public comment period.

ADOPTED by the Eden Prairie City Council on July 14, 2015.


Nancy Tyra Lukens, Mayor

ATTEST:


Kathleen Porta, City Clerk

From: [Lavelle, Ray](#)
To: [swlrt](#)
Cc: [Schroeder, Michael](#)
Subject: Comment Letter from MPRB
Date: Tuesday, July 21, 2015 4:58:25 PM
Attachments: [2015-07-21 SDEIS Response Letter from Liz Wielinski.pdf](#)

Please see the attached comment letter from Mpls. Park & Recreation Board.

Thank you.

Ray

Ray Lavelle
Executive Assistant/Planning Division
Minneapolis Park and Recreation Board
2117 West River Road
Minneapolis, MN 55411
(612) 230-6472
www.minneapolisparcs.org



**Minneapolis
Park & Recreation Board**

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

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

Phone
612-230-6400

Fax
612-230-6500

www.minneapolisparcs.org

President
Liz Wielinski

Vice President
Scott Vreeland

Commissioners
Brad Bourn
John Erwin
Meg Forney
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Jayne Miller

Secretary to the Board
Jennifer B. Ringold



July 21, 2015

Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit – Southwest LRT Project Office
6465 Wayzata Blvd., Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson:

The Minneapolis Park & Recreation Board (MPRB) welcomes this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit (SWLRT) project. The MPRB's comment letter builds upon statements and outcomes noted in comments on the Draft Environmental Impact Statement (DEIS) while focusing on the changes to the project noted in the SDEIS. To best recognize the MPRB's earlier comments, members of a Community Advisory Committee formed to guide comments on the DEIS were assembled to offer insights related to the SDEIS.

In 1883, the Minneapolis Park & 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 one of ten 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 the proposed SWLRT alignment received more than 6 million visits.

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. As stated in the MPRB's comments on the DEIS, there are several overarching messages the MPRB wishes to express

regarding the SWLRT project:

- MPRB remains 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, Cedar Lake Regional Trail, and Cedar Lake Park. 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.
- Other parks in or near the corridor include Alcott Triangle, Park Siding Park, and Bryn Mawr Meadows. These parks serve more neighborhood use and maintaining existing park settings, access, and use are clear priorities of the MPRB.
- Visual quality and noise are key areas of concern for the MPRB. The introduction of light rail transit in combination with freight rail poses the potential for significant disturbance to a corridor that, once disturbed, may never regain the "dense regular massing of trees bordering the corridor [that] creates a highly memorable element," as noted in the SDEIS.
- The seamless connections between and among parks and trails is a key attribute of the Kenilworth Corridor, one which the MPRB believes should be present in the corridor to at least to the extent it is today after introduction of the combination of LRT and freight rail.
- The perpetuation of freight rail in the Kenilworth Corridor, which the MPRB believes makes that infrastructure a permanent element, is a substantive change from the DEIS, one that varies dramatically from a long-held understanding of the use of the corridor and one that poses significant safety concerns for trail users and the natural setting and environment of the corridor.

The MPRB believes many of its comments offered as part of its response to the DEIS remain valid and should be perpetuated. To that end, we have attached our comments on the DEIS to this response to the SDEIS.

Thank you for this opportunity to comment on the SDEIS for the SWLRT project. If you have any questions, please do not hesitate to contact Michael Schroeder, Assistant Superintendent for Planning, at mschroeder@minneapolisparcs.org.

Sincerely,



Liz Wielinski
President, Minneapolis Park & Recreation Board

Attachments: SDEIS Comments (July 21, 2015)
SDEIS Comments (December 5, 2012)

Comments Submitted by the Minneapolis Park & Recreation Board in Response to the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project

July 21, 2015

CONTINUATION OF FREIGHT RAIL OPERATIONS IN THE KENILWORTH CORRIDOR

REVIEW

As described in the SDEIS, changes to the St. Louis Park/Minneapolis Segment of the SWLRT project would continue freight rail operations in the corridor by co-locating those facilities with the proposed LRT infrastructure. This change presents concerns related to the baseline comparison of impacts evaluated in the SDEIS.

In a *relocation* solution, issues related to freight rail operations in the Kenilworth Corridor are eliminated. The impacts of LRT on the setting and experience of the corridor can be based solely on the introduction of LRT. The baseline for noise is greatly reduced with the elimination of freight rail operations in the corridor, the need for expanding the corridor is limited, the existing significant and character-defining visual features are largely retained, and concerns for safety can be limited to the interactions of corridor users with light rail operations only.

With *co-location*, the noise of LRT is additive to freight rail, the corridor must be significantly expanded by impacting features noted in the SDEIS as definitive of the character of the Kenilworth Corridor, safety concerns related to trail access and blockage of trail connections are increased, and concerns related to park and trail user safety relative to the potential for spills and combustion of conveyed freight becomes significant. In addition, significant disturbance and additional construction is required near sensitive environmental and recreational features.

The MPRB is interested in a more direct comparison of impacts related to visual quality, noise, safety, and construction using re-location as a baseline. While we understand the solution proposed in SDEIS is co-location, we believe the impacts and, importantly, the strategies for mitigation, are best documented using parallel comparisons of co-location and relocation.

OUTCOMES

- A. A comparison of the effects of co-location based on a solution where freight rail is not present in the Kenilworth Corridor.

SDEIS SECTION 3.4.1.3 (CULTURAL RESOURCES)

REVIEW

The Kenilworth Corridor is a resource enjoyed by tens of thousands of visitors each year. While it serves as a bicycle commuting route between Minneapolis and southwest suburbs, users are attracted to the corridor as a recreation resource based on its location relative to features of the Minneapolis' Grand Rounds and the Minneapolis Chain of Lakes Regional Park and the unique settings of each. Cultural resources are prominent as an attraction and the SDEIS identifies features important to the MPRB and, notes adverse effects of the SWLRT project on those features and resources.

July 21, 2015

The MPRB offers the following comments relative to Section 3.3.1.3 (Cultural Resources) provided in the SDEIS:

1. Table 3.4-4 (Cultural Resources in St. Louis Park/Minneapolis Segment that would be adversely affected under the LPA), Historic Districts, XX-PRK-001, notes impacts to the Grand Rounds from the introduction of LRT. The MPRB is keenly interested in preserving the qualities and integrity of the Grand Rounds, a resource under its jurisdiction. The MPRB agrees that the project poses the potential for adverse impacts, but also notes those impacts cannot be fully understood from information presented in the SDEIS. The MPRB anticipates the Metropolitan Council will provide information sufficient and comprehensive in nature to understand and evaluate impacts on the Grand Rounds, particularly as it relates the visual quality and encroachments of LRT and LRT-supporting infrastructure, as well as any new freight rail infrastructure, on the setting and viewsheds of the Grand Rounds.
2. Table 3.4-4 (Cultural Resources in St. Louis Park/Minneapolis Segment that would be adversely affected under the LPA), Individual Resources, HE-MPC-1822 cites the impacts on the Kenilworth Lagoon. The MPRB agrees that passage under the proposed bridges is a significant issue and that the introduction of additional bridge deck area poses an impact on the experience of users of the Kenilworth Channel (referred to as the Kenilworth Lagoon in the SDEIS). The MPRB, through a Memorandum of Understanding (MOU) created between the MPRB and the Metropolitan Council, have agreed to cooperate on the design of the bridge crossings of the channel. That process has not concluded so comment on the impacts cannot be offered. In the MOU, a process for designing the bridges and concepts for their design were framed. The MPRB anticipates the design will be aligned with the terms of the MOU. Significantly, the MPRB seeks a solution that encourages passage for channel users by reducing or eliminating encroachment of bridge components into the channel as the primary method of respecting the historic qualities of the channel.
3. Table 3.4-4 (Cultural Resources in St. Louis Park/Minneapolis Segment that would not be adversely affected under the LPA), Individual Resources, HE-MPC-1833 cites Cedar Lake Parkway as unaffected by the project. It notes effects considered include "LRT tunnel portal outside of the parkway" but views from the parkway to this portal are part of the experience of the parkway. In fact, views demonstrated for the tunnel portal and the necessary fencing (Appendix J, Exhibit J-13) suggest that infrastructure is significant to the viewshed from the parkway. In addition, Section 3.4.1.5 (Visual Quality and Aesthetics) notes the positive effects of the "dense regular massing of trees bordering the corridor creates a highly memorable moment." That visual feature is, in the view of the MPRB, part of the experience of the parkway. As a result, the MPRB disagrees that Cedar Lake Parkway is unaffected by the project and recommends it be included with other adversely impacted resources.

OUTCOMES

- A. Encroachments of LRT and LRT-supporting infrastructure as well as freight rail and its infrastructure are demonstrated for their visual impacts on cultural resources present on MPRB parklands and recreation areas and that methods of reducing those visual impacts on the experience of parks and trails users is minimized.

July 21, 2015

SDEIS SECTION 3.4.1.4 (SOURCE: MNDOT CRU, 2014.IMPACTS ON PARKLANDS, RECREATION AREAS, AND OPEN SPACES)

REVIEW

The Kenilworth Corridor and the North Cedar Lake Trail are maintained or owned and maintained by the MPRB as significant regional recreation resources. The introduction of LRT in a co-location scenario is a concern for the MPRB particularly from the perspective of impacts on these resources and safety concerns resulting from co-location. For the MPRB, the Kenilworth Corridor serves 550,000 users annually and the North Cedar Lake Trail serves 414,000 users annually (estimates provided by the Metropolitan Council), making these parklands, recreation areas, and open spaces areas of primary concern for the MPRB. Because this section deals, in part, with access to those facilities, the MPRB believes safety at crossings of LRT and freight rail infrastructure should be addressed.

The MPRB offers the following comments relative to Section 3.4.1.4 (Source: MnDOT CRU, 2014, Impacts on Parklands, Recreation Areas, and Open Spaces) provided in the SDEIS:

1. Section 3.4.1.4 (Source: MnDOT CRU 2014.Parklands, Recreation Areas, and Open Spaces) notes “there would be no long-term direct impacts from the LPA on parklands, recreation areas, and open spaces in the segment.” Co-location poses the potential for safety impacts, which the MPRB considers to be a long-term and direct impact on resource users. The presence of freight rail and its impacts on safety for users of the Kenilworth Corridor has not been fully addressed in the SDEIS from the perspective of any failure of LRT or freight rail infrastructure and the ability to respond to an emergency condition.
2. Table 3.4-6 (Parks, Recreation Areas, and Open Spaces in the St. Louis Park/Minneapolis Segment) notes resources and impacts in this segment of the project. The MPRB agrees this list is complete and accurate based on its understanding of the project as demonstrated through the SDEIS, but notes that safety concerns noted in the introduction to this section are not included in the “Types of Impacts.” From the perspective of the MPRB, any crossing of LRT or LRT and freight rail that is not grade-separated poses an impact on users of the parkland, recreation area, or open space resource. In particular, the MPRB is concerned that the combination of LRT and freight rail compromises safety for pedestrian and bicycle crossings when those crossings occur at-grade and recommends the Metropolitan Council address those crossings in greater detail and for any changes where grade separation is eliminated that the Metropolitan Council demonstrate the ways in which an at-grade crossing can be made equally safe as the grade-separated crossing. While the SDEIS references Appendix G for information related to crossings, the diagrams are too general to understand the specific measures to be implemented to maintain a safe crossing for pedestrians and bicyclists of LRT or LRT and freight rail.
3. Under Long-Term Direct and Indirect Parklands, Recreation Areas, and Open Spaces Impacts, it is noted the “The indirect impacts of the LPA would be in the form of visual, noise, and/or access impacts, addressed in greater detail in Sections 3.4.1.5, 3.4.2.3, and 3.4.4.4 of this Supplemental Draft EIS.” This section of the SDEIS references the North Cedar Lake Regional Trail and correctly notes it is owned and operated by the MPRB. However, Section 3.4.1.5 (Visual Quality and Aesthetics) does not fairly or fully address the visual impacts of a bridge crossing of LRT and freight rail. The MPRB believes this structure poses the potential for a significant visual impact on the

Comments Submitted by the Minneapolis Park & Recreation Board in Response to the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project

July 21, 2015

setting of Cedar Lake Park due to its length and height. While the MPRB supports inclusion of the bridge to provide safe crossing of LRT and freight rail, its design poses the potential for a significant impact on the parkland resource of Cedar Lake Park and on users of the North Cedar Lake Regional Trail.

OUTCOMES

- A. The corridor design fully addresses potential safety impacts posed by LRT and freight rail in the corridor, including accommodation of emergency response in the event of a spill, leak, or combustion of any conveyed freight.
- B. Fire, police, and emergency medical personnel and equipment are able to access parklands adjacent to the corridor and provide response times that meet relevant laws and standards.
- C. At-grade trail crossings at LRT and freight rail, especially where the trail must cross both facilities in the same location, are made equally as safe as a grade-separated crossing.
- D. The visual quality of all structures within or visible from parklands are addressed in ways that minimize their intrusion upon the natural settings or activity areas
- E. The North Cedar Lake Trail bridge crossing LRT and rail infrastructure is designed to minimize its visual impact and any adverse impacts to its setting in Cedar Lake Park.

SDEIS SECTION 3.4.1.5 (VISUAL QUALITY AND AESTHETICS)

REVIEW

The Kenilworth Corridor presents a visual quality that is recognized in the SDEIS as “dominated by the existing trails themselves and adjacent active freight rail track. The trails and freight rail alignment are generally surrounded by overstory and understory deciduous vegetation.” The SDEIS further describes the visual quality of the corridor by stating “Dense regular massing of trees bordering the corridor creates a highly memorable element.” The MPRB confirms these points as the key visual elements of the corridor, both of which are central to the experience of the corridor. It also notes that the SDEIS, in general, considers visual quality impacts during a limited portion of the year, but because of the year-round use of parks and recreation areas addressed in the SDEIS, impacts on visual quality should consider “leaf-off” conditions.

The MPRB offers the following comments relative to Section 3.4.1.5 (Visual Quality and Aesthetics) provided in the SDEIS:

- 1. While the process of documenting existing visual character is clear and follows processes to which the MPRB agrees, the nature of views as static are contrary to the experience of corridor users. The nature of an assessed view should be translated to the experience of a traveler in the corridor; that is, instead of a limited number of viewpoints attempting to characterize the visual experience, the constantly changing viewpoints of a bicyclist or a pedestrian should be considered. It is from that perspective that the “dense regular massing of trees bordering the corridor” becomes important.

July 21, 2015

2. Section 3.4.1.5 (Visual Quality and Aesthetics) indicates that Traction Power Substations (TPSS) will be sited in “fully developed areas, including surface parking lots, existing roadway right-of-way, and vacant parcels where feasible.” The Kenilworth Corridor, a primary concern of the MPRB, has none of these siting opportunities. Because these features should be considered a visual intrusion similar to the “addition of the station infrastructure and the overhead equipment required by the LRT,” Table 3.4-8 (Anticipated Direct Change and Impact in Visual Quality and Aesthetics from St. Louis Park/Minneapolis Segment Viewpoints, Viewpoint 6, Intactness), they should be considered a significant factor for the change in visual quality in the corridor.
3. Table 3.4-7 (Existing Visual Quality and Aesthetics by Viewpoint in the St. Louis Park/Minneapolis Segment) reinforces the roles of the dense massing of trees in forming the vividness and unity of the corridor from the perspective of visual quality. It further suggests the viewpoints are generally free of visual encroachments. To these points, the MPRB offers its concurrence.
4. Table 3.4-8 (Anticipated Direct Change and Impact in Visual Quality and Aesthetics from St. Louis Park/Minneapolis Segment Viewpoints) indicates the primary thresholds for visual character are decreased or diminished by the removal of trees to accommodate the transit and freight rail improvements and by the introduction of LRT-supporting infrastructure. In essence, the MPRB would interpret this to mean the existing visual character—and therefore, the visual experience—is denigrated by the proposed changes. From that perspective, and regardless of the formula applied to achieve the visual impact ratings, each viewpoint should be considered substantially impacted. In addition, this table seems to underestimate the impacts of LRT-supporting infrastructure. In demonstrations included in Appendix J, every preliminary rendering with LRT running at grade includes LRT-supporting infrastructure that becomes an intrusion upon the visual experience for users of the Kenilworth Corridor.
5. Table 3.4-8 (Anticipated Direct Change and Impact in Visual Quality and Aesthetics from St. Louis Park/Minneapolis Segment Viewpoints) for Viewpoint 3 describes the view from Cedar Lake Parkway toward the tunnel and the channel crossing. The description notes the tunnel portal as a part of the view, but the lack of notation regarding the portal suggests that it has no visual impact. In fact, the preliminary rendering shown in Exhibit J-13 would suggest the portal has a substantial visual impact. Replacing the existing split rail fence with a taller and more expansive fence at the portal does not respect the intactness described for this viewpoint in Table 3.407. While the SDEIS notes this as a substantial visual impact, the MPRB remains very concerned that mitigation will not restore the visual experience currently enjoyed by trail users.
6. Table 3.4-8 (Anticipated Direct Change and Impact in Visual Quality and Aesthetics from St. Louis Park/Minneapolis Segment Viewpoints) for Viewpoint 5 indicates the “increased clearance and openness under the bridge would create a visual connection between the segments of the lagoon north/south of the new bridges.” The MPRB agrees this is a positive change. However, the narrative description for Viewpoint 5 suggests “the bridge, as currently conceived, will have an attractive design that will become a positive focal point in the view.” From the perspective of the MPRB, this set of bridges has the potential of substantially improving the visual experience of the lagoon by removing as many piers as possible from the water, thereby reinforcing the lagoon itself as the focal point—not the bridge. As the design of the bridges proceeds, the MPRB encourages enhancement of the openness of the view, removal of bridge encroachments into the lagoon, and minimizing the

July 21, 2015

visual focus of the new bridges. The narrative description of this viewpoint indicates the impact as “Not Substantial,” but this determination is largely dependent on the design of the introduced bridges.

7. Table 3.4-8 (Anticipated Direct Change and Impact in Visual Quality and Aesthetics from St. Louis Park/Minneapolis Segment Viewpoints) for Viewpoint 6 indicates the same response for Intactness and Unity. But more important, the description of the change suggests “the addition of the station structures will make a positive contribution to the level of vividness that counterbalances the loss of vividness due to vegetation removal.” While a formulaic application of a visual quality assessment might allow for the substitution of one factor of visual quality for another, the MPRB suggests the introduction of a station cannot be considered a reasonable replacement for the loss of trees, especially when the assessment of views for the corridor suggests the dense massing of trees is a central feature of the corridor and that two of the three factors evaluating the view indicate the loss of trees decreases or reduces the factor (and the third factor cannot be determined from the SDEIS because of an apparent typographical error).
8. Section C (Mitigation Measures) indicates mitigation measures will “include landscaping, visual treatment and continuity with the elevated light rail structure design, lighting, and signage.” A footnote references Section 3.4.1.3, but is suggesting measures of mitigation will be achieved through “sensitive design and the incorporation of protective measures” (Table 3.4 (Cultural Resources in St. Louis Park/Minneapolis Segment that would be adversely effected under the LPA), Individual Resources, HE-MPC-1822). The MPRB suggests that further definition is required to understand how sensitive design and protective measures will replace the “dense regular massing of trees bordering the corridor” that is indicated in the SDEIS as creating a “highly memorable element.”
9. While this section of the SDEIS addresses key viewpoints of concern to the MPRB, it fails to address other significant points of visual quality related to MPRB resources. In particular, this section does not address the impacts on visual quality of the proposed grade-separated crossing of LRT and freight rail of the North Cedar Lake Regional Trail (an MPRB-owned and operated facility) and Cedar Lake Park. In addition, there is no mention of the landing for a bridge extending from Van White Memorial Boulevard and its impacts on Bryn Mawr Meadows, parkland under the jurisdiction of the MPRB. Finally, Table 3.4-6 (Parks, Recreation Areas, and Open Spaces in the St. Louis Park/Minneapolis Segment) notes visual changes as an impact at Park Siding Park, but no mention of the visual quality impacts are noted in Section 3.4.1.5.

OUTCOMES

- A. The “dense regular massing of trees bordering the corridor” remains a defining element of the corridor.
- B. Assessments of visual quality address “leaf-off” conditions in recognition of the year-round use of the Kenilworth Corridor and MPRB parks and recreation areas.
- C. LRT-supporting infrastructure, including features not addressed or not fully addressed in the Visual Quality and Aesthetics section such as traction power substations and the LRT tunnel portal, is designed in ways that minimize visual impacts upon trail users.

July 21, 2015

- D. The experience of Kenilworth Channel users is orchestrated to maintain focus on the channel as the primary feature, with bridges that remain background elements for channel users.
- E. Stations, while significant structures in the setting of the Kenilworth Corridor, are not substitutes for the visual quality of the existing natural setting.
- F. Visual impacts to all parklands are addressed through a process that emphasizes the quality of the visual experience with the natural setting as the dominant feature.

SDEIS SECTION 3.4.2 (ENVIRONMENTAL EFFECTS)

REVIEW

The physical location of the Kenilworth Corridor is important to the MPRB not only as a recreation resource, but because of its geographic context among several lakes of the Chain of Lakes Regional Park. Instances of environmental degradation related to the introduction of LRT are of primary concern because of the proximity of the natural features along the corridor. Still, the corridor is an important recreation feature, offering a route for pedestrians and bicyclists totaling more than 550,000 visits per year. The introduction of LRT alongside freight rail poses changes related to safety and connectivity that are a paramount concern for the MPRB.

The MPRB offers the following comments relative to Section 3.4.2 (Environmental Effects) provided in the SDEIS:

1. Section 3.4.2.1 (Geology and Groundwater) notes “there is the potential for long-term pumping of surface water from the tunnel portals (predominantly stormwater) that collects inside and at the lowest point of the tunnel portals and is routed to underground infiltration chambers.” This section notes further “As described in the Draft EIS, in areas of high groundwater elevations and granular soils, there is an increased potential for groundwater contamination as a result of previous hazardous and contaminated materials spills.” In a description of the effects of the tunnel on lake levels, the SDEIS indicates “Groundwater and lake levels in the area surrounding Cedar Lake, Lake of the Isles, and Lake Calhoun are very similar, with little change in elevation across the system” and “there is little or no groundwater gradient among the lakes; groundwater does not ‘flow’ from one water body to another.” During the MPRB’s study of alternative crossing of the Kenilworth Channel, consultant reports suggest there is a directional movement of groundwater in this area, with a general direction along the alignment of the LRT corridor. The MPRB notes these statements as inconclusive relative to the potential for contamination and adverse impacts on the lakes. That construction activities could increase the potential for groundwater contamination, that groundwater (now potentially contaminated) would be collected upon entering portion of the tunnel and then infiltrated using underground chambers, and that there is evidence the groundwater system in this area is connected (regardless of flow), suggests a risk for groundwater contamination from the presence of the tunnel that needs to be addressed.

The SDEIS focuses on the potential impacts of groundwater contamination resulting from LRT operations and suggests “The potential to contaminate groundwater from operation of the light rail system would be low, because the trains would be electric and, generally, no activities that generate

July 21, 2015

pollutants would occur in this area.” Notwithstanding the MPRB’s comments above related to groundwater, the SDEIS does not address the potential for contamination of groundwater from the operations of freight rail in the Kenilworth Corridor. Because co-location is the basis of the SDEIS and because the LPA makes freight rail a permanent component of the corridor, the potential for groundwater contamination from freight rail operations should be addressed.

2. Section 3.4.2.1 (Geology and Groundwater), part C (Mitigation) addresses a groundwater management plan to be prepared as part of the project and that it would address “collection, storage, and disposal of surface water runoff from the light rail track systems, stations, and other infrastructure developed as part of the project.” Because the LPA is based on co-location with freight rail becoming a permanent component of the corridor, freight rail is part of the “other infrastructure developed as part of the project” and should be addressed in the groundwater management plan.
3. Section 3.4.2.2 (Water Resources: Wetlands, Floodplains, Public Waters, and Stormwater Management, Part B. Potential Water Resource Impact, Public Waters and Stormwater Management) indicates that “runoff from newly poured concrete surfaces can have high alkalinity, often above pH 9, which can result in degraded water quality and can affect fish.” This section further states “The concrete used for this project would take several months to cure enough so that the pH of exposed surfaces decreased to acceptable levels. Stormwater runoff would be tested, and if excessive levels of pH or turbidity are found, the runoff would be treated before it is released to storm sewers or a receiving water body.” From the perspective of the MPRB, “acceptable levels” would be at least the same as those levels found prior to the construction of the improvements. In addition, when the receiving water bodies include those under the jurisdiction of the MPRB or are related to its park resources, the MPRB would urge the Metropolitan Council to treat any runoff from those surfaces that might degrade water quality or affect fish, and to not rely upon finding excessive levels of pH or turbidity (at which point, the MPRB assumes, some stormwater runoff would have already entered receiving water bodies).

In addition, the SDEIS fails to address the potential impacts to water resources from a spill or leak of conveyed freight in the Kenilworth Corridor. Because the LPA makes freight rail a permanent component of the corridor, the potential impacts should be recognized and addressed as a part of the SDEIS.

4. Section 3.4.2.3 (Noise), A. Existing Conditions indicates that east of West Lake Station and the Kenilworth Lagoon “Currently, the dominant noise source in the segment is existing freight rail traffic.” The nature of the park setting suggests that this noise level not be exceeded by the combination of LRT and freight rail in the corridor. In fact, and as noted at the beginning of these comments, the MPRB believes a more fair demonstration of impacts would be achieved by indicating a comparison to a re-location solution where the impacts of noise from freight rail would be eliminated from the corridor.
5. Section 3.4.2.3 (Noise), B. Potential Noise Impacts, Long-Term Direct and Indirect Noise Impacts indicates that “The presence of the proposed tunnel in the Kenilworth Corridor eliminates almost all noise impacts relative to an at-grade LRT system within the same segment of the corridor,” yet it fails to identify what noise impacts remain. The MPRB desires clarity on those impacts that remain after “almost all” have been eliminated so that it can better understand the mitigation that might be

July 21, 2015

proposed. Table 3.4-12 (Summary of Noise Impacts for Category 1 and Category 3 Land Use – St. Louis Park/Minneapolis Segment) summarizes impacts of noise on the Kenilworth Channel and Kenilworth Lagoon Bank. A MOU between the MPRB and the Metropolitan Council addresses concerns related to noise at the Kenilworth Channel crossing and suggests that a design for the bridges would “incorporate strategies or features in the design of a bridge that respond to findings of MPRB’s study of channel crossing concepts.” The MOU indicates “The MPRB undertook a study of the channel crossing and determined visual quality and noise as the MPRB’s highest priorities for consideration in the design of the bridge.” Notwithstanding the statements of this section, the MPRB expects the Metropolitan Council will maintain adherence to the MOU and determine methods of reducing noise impacts in the area of the Kenilworth Channel and Kenilworth Lagoon Bank regardless of the type and number of impacts indicated in the SDEIS because, as is noted in this section of the SDEIS, “quietude is essential feature of the park.”

6. Section 3.4.2.4 (Vibration), C. Mitigation Measures indicates mitigation for vibration impacts will be incorporated in a vibration mitigation plan. For the MPRB, vibration impacts at the Kenilworth Channel bridges remain a concern. Preliminary design directions for the bridges suggest the potential for a trail bridge separated from an LRT bridge. The MPRB believes this is significant in reducing vibration impacts for trail users, even as we understand that vibration for outdoor receptors are not a consideration.
7. Section 3.4.2.5 (Hazardous and Contaminated Materials) indicates the design of the tunnel would include measures that would, “In the unlikely event of a spill of hazardous or contaminated materials in the tunnel... prevent infiltration of groundwater through the tunnel bottom and allow contaminated materials to be collected... and not released into the groundwater.” While these measures for unlikely events are appreciated, the MPRB remains concerned about the potential for construction activities to change conditions and allow contaminated materials to move toward lakes or other water bodies.
8. Section 3.4.4.5 (Bicycle and Pedestrian) describes the impacts of the LPA on bicycle and pedestrian facilities, many of which are under the jurisdiction of the MPRB in this segment of the corridor. The MPRB desires further information on the safe crossing of LRT and freight proposed in the area of the 21st Street Station due to its proximity to East Cedar Beach. The combination of rail crossings at this location poses concerns for pedestrian and bicycle access, in particular resulting from those users becoming suddenly and temporarily “trapped” between rail crossings. Recent discussions of the Metropolitan Council related to cost reductions suggest elimination of the North Cedar Lake Trail Bridge which would present the same concerns to the MPRB. Crossings for pedestrians in the area of the West Lake Street Station are also concerns for the MPRB, in part because of the attraction of Lake Calhoun and desires for movement to the Minneapolis Chain of Lakes Regional Park. This section notes Appendix G offers a conceptual design of improvements but the diagrams are too general to understand the ways in which pedestrian and bicycle safety will be provided.
9. Section 3.4.4.5 (Bicycle and Pedestrian) describes impacts related to LRT for pedestrians and bicyclists, but the significant change presented in the SDEIS is the presence of freight rail in the Kenilworth Corridor. The MPRB believes freight rail can be a safety concern for trail users and it should be addressed in a Final Environmental Impact Statement. Further, other portions of the SDEIS describe the potential for blockage of local roadways by freight trains, but the SDEIS does not describe the potential for blockage of trail intersections. In particular, if the proposed North Cedar

July 21, 2015

Lake Trail bridge is eliminated as a cost saving measure, an FEIS must address the blockage of the intersection of the North Cedar Lake Trail and address any safety concerns for trail users resulting from such a blockage. In addition, the MPRB is concerned about potential blockage by freight rail at West 21st Street, not only from the perspective of access to East Cedar Beach by park users but recognizing the need to maintain access to the beach for emergency vehicles.

10. Section 3.4 does not address the impacts on wildlife and wildlife migration in the Kenilworth Corridor or Cedar Lake Park. These are significantly large natural and habitat areas and the impacts of LRT and freight rail infrastructure, particularly fencing and walls, should be addressed by the project.

OUTCOMES

- A. Any permanent dewatering methodologies applied to the corridor protect water table levels and quality, and habitat within the parklands that is dependent on those water levels.
- B. The groundwater management plan addresses impacts of all rail infrastructure, not just new LRT infrastructure.
- C. When dealing with construction impacts to water bodies within or near parklands, best practices are implemented as a baseline for project activities, not as a response to discovered excessive pH or turbidity levels.
- D. Noise and vibration impacts are minimized for park and trail users and maintained at levels not greater than the extant condition.
- E. Because co-location makes freight rail a permanent condition in the corridor, comparisons are made to conditions that do not use freight rail as a baseline to ensure proper mitigation is included as part of the project.
- F. Bridge crossings of the Kenilworth Channel are achieved with a separated trail structure to ensure vibrations from rail are not translated through the structures to pedestrians or bicyclists.
- G. Technologies are incorporated that reduce track noise and vibration.
- H. Potential contamination, spills, and leaks from freight rail operations will not impact the natural features or environmentally sensitive elements of the corridor, and the potential for combustion of conveyed freight is addressed with considerations of impacts on park and trail users and emergency response requirements.
- I. Fire, police, and emergency medical personnel and equipment are able to access parklands adjacent to the corridor and provide response times that meet relevant laws and standards.
- J. The potential for construction activities to change conditions and allow contaminated materials to move toward lakes or other water bodies is addressed as a core component of the implementation plan.

Comments Submitted by the Minneapolis Park & Recreation Board in Response to the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project

July 21, 2015

- K. Bicycle and pedestrian intersections with LRT and freight rail infrastructure if required to be at-grade are developed in ways that are equal in safety to grade separated crossings.
- L. Trail crossings of rail infrastructure does not create blockage for trail users except when trains are passing (in motion through) the crossing.
- M. The trail design meets the needs of current and projected users.
- N. All trail connections are maintained or improved.

SDEIS SECTION 3.5 (DRAFT SECTION 4(F) IMPACTS)

REVIEW

The MPRB provided information to the Metropolitan Council related to its park properties along and near the SWLRT corridor. The MPRB agrees that the list of properties included in the SDEIS is complete and correct.

The MPRB offers the following comments relative to Section 3.5 (Draft Section 4(f) Impacts) provided in the SDEIS:

1. Table 3.5-2 (Summary of FTA's Preliminary Section 4(f) Property Use Determinations) lists and describes the impacts of SWLRT on MPRB park properties. The MPRB agrees with the determinations provided the comments of this section are recognized and addressed by the project.
2. Section 3.5.1.4 (Section 4(f) Use Definitions and Requirements), A. Individual Section 4(f) Evaluation indicates "*de minimus* use is described below in Section 3.5.1.6." The SDEIS published by the Metropolitan Council does not include this section.
3. Section 3.5.4.1 (Publicly Owned Parks and Recreation Areas), I. Park Siding Park – Preliminary No Section 4(f) Use Determination, Preliminary Determination of Temporary Section 4(f) Use indicates that 0.016 acre of the park would be used to construct and remove a temporary trail detour as a result of the SWLRT project. It has been discussed that changes made necessary by the SWLRT tunnel will result in the need to reconstruct a portion of sanitary sewer in the area of Cedar Lake Parkway, a part of which will impact Park Siding Park. The FEIS should identify this need, if in fact the park is required for this construction activity.
4. Section 3.5.4.1 (Publicly Owned Parks and Recreation Areas), J. Kenilworth Channel/Lagoon (as an element of the Minneapolis Chain of Lakes Regional Park) – Preliminary *De Minimis* Determination, Preliminary Determination of Permanent Section 4(f) Use: Section 4(f) *de minimis* Use indicates the channel "would not be adversely impacted under the LPA and the horizontal clearances between the banks and the new piers [of bridges supporting the trail, LRT, and freight rail] would be of sufficient width to accommodate recreational activities that occur within the channel/lagoon." The MPRB has been active in the design of bridges and understands it is possible to span the channel for the purposes of the trail crossing with no piers extending into the water and that it may be possible to span the channel for the purposes of the LRT crossing with no piers extending into the water. The MPRB considers this possibility to be a positive feature of a proposed bridge as it maximizes the

July 21, 2015

open water available in the channel for recreation use. However, the bridge decks are more expansive than in the extant trail/freight rail bridge causing concerns for the amount of snow that might be collected on the channel under the bridge. Winter activities, including cross-country skiing are important features of this part of the park and must be considered as a part of the crossing.

5. Section 3.5.4.1 (Publicly Owned Parks and Recreation Areas), J. Kenilworth Channel/Lagoon (as an element of the Minneapolis Chain of Lakes Regional Park) – Preliminary *De Minimis* Determination, Preliminary Determination of Permanent Section 4(f) Use: Section 4(f) Use indicates the new bridge crossings of the Kenilworth Channel “would have an attractive design that would become a positive focal point in the view.” In the visual quality assessment, this view change is indicated to be Not Substantial, but in fact views of the bridges should be of secondary importance when compared to the channel—the historic resource.
6. Section 3.5.4.1 (Publicly Owned Parks and Recreation Areas), J. Kenilworth Channel/Lagoon (as an element of the Minneapolis Chain of Lakes Regional Park) – Preliminary *De Minimis* Determination, Preliminary Determination of Permanent Section 4(f) Use: Section 4(f) *de minimis* Use indicates the areas of the Kenilworth Channel would be moderately impacted by noise. The MPRB, through an MOU with the Metropolitan Council, has identified noise generated by LRT to be a primary concern and one that will be addressed as a part of the bridge design process.
7. Section 3.5.4.1 (Publicly Owned Parks and Recreation Areas), K. Cedar Lake Park – Preliminary *De Minimis* Determination, Preliminary Determination of Permanent Section 4(f) Use: Section 4(f) *de minimis* Use, Cedar Lake Junction indicates the realignment of an existing trail to create a grade-separated crossing of LRT and freight rail. Because of the intensity of trail use, managing crossings for pedestrian and bicyclist safety remains a primary concern for the MPRB. In addition, the MPRB recognizes this crossing, due to its height and length, would permanently alter the setting in the north portion of Cedar Lake Park. The design of the bridge should, in the opinion of the MPRB, find ways to minimize its visual impact on trail and park users. In the SDEIS, this bridge was not addressed in the section related to Visual Quality and Aesthetics.
8. Section 3.5.4.1 (Publicly Owned Parks and Recreation Areas), L. Bryn Mawr Meadows Park – Preliminary *De Minimis* Determination, Preliminary Determination of Permanent Section 4(f) Use indicates a bridge and a new elevated section of the Luce Line Trail would be constructed in a portion of the park and trails connecting to this bridge would be reconstructed in a portion of the park. While the MPRB is supportive of the demonstrated alignment, the presence of the bridge in the park setting is significant. In the SDEIS, this bridge was not addressed in the section related to Visual Quality and Aesthetics.

OUTCOMES

- A. Minneapolis Chain of Lakes Regional Park and adjoining parkland remains a quiet, tranquil, and natural park destination.
- B. The area between Lake Street and I-394 is naturally beautiful and serene.
- C. 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.

Comments Submitted by the Minneapolis Park & Recreation Board in Response to the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project

July 21, 2015

- D. The trail design meets the needs of current and projected users.
- E. All trail connections are maintained or improved.
- F. 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.
- G. Trail crossings of LRT and freight rail are safe and logical, and do not present unnecessary delays for trail or park users.
- H. The combination of LRT and freight rail does not impact the safety of park, trail or beach users.
- I. Fire, police, and emergency medical personnel and equipment are able to access parklands adjacent to the corridor and provide response times that meet relevant laws and standards.
- J. Structures introduced to parklands to support LRT or accommodate its presence or to support freight rail are designed to allow the park setting to remain the prominent feature of the park or recreation use.
- K. Recreation activities currently available in the Kenilworth Corridor and MPRB parks are equal to or better upon completion of the SWLRT project as those that exist.
- L. Park or recreation features are restored upon completion of temporary construction activities to match as closely as possible the extant conditions.

Minneapolis Park and Recreation Board Southwest Transitway DEIS Comment Letter



Lake Calhoun



Cedar Lake



Lake of the Isles



Lake of the Isles

TABLE OF CONTENTS

Transmittal Letter	1
Introduction	3
MPRB Community Advisory Committee	3
Comment Letter Structure	4
Corridor and Comment Location Map	5
Co-Location Alternative	6
1 Entire Corridor	7
1.1 Location and Description	7
1.2 Issue: Section 4(f) analysis.....	7
1.3 Issue: Design character.....	8
1.4 Issue: Trail access, use, and maintenance	9
1.5 Issue: Noise and Vibration.....	10
1.6 Issue: Visual appeal	11
1.7 Issue: Safety.....	12
1.8 Issue: Construction	12
2 Linden Avenue	14
2.1 Location and Description	14
2.2 Issue: Access, flow	14
3 Luce Line Regional Trail Junction	15
3.1 Location and Description	15
3.2 Issue: Access, flow	15
4 Spring Lake Trail Junction	16
4.1 Location and Description	16
4.2 Issue: Access, flow, and connectivity	16
4.3 Safety.....	16
4.4 Issue: Comprehensive approach	16
5 Bryn Mawr Meadows Park	17
5.1 Location and Description	17
5.2 Issue: Access and safety	17
5.3 Issue: Visual appeal	17
5.4 Issue: Comprehensive approach	17
6 Cedar Lake Regional Trail and LRT Crossing Area	18
6.1 Location and Description	18
6.2 Issue: Safety, use, access, connectivity	18
6.3 Issue: Environmental protection	19
7 Intersection with West 21st Street	20
7.1 Location and Description	20
7.2 Issue: Park access	20
7.3 Issue: Safety.....	20
7.4 Issue: Aesthetics, noise.....	20
8 Kenilworth Channel, Bridge	22
8.1 Location and Description	22
8.2 Issue: Historic character, aesthetics, tranquility	22
8.3 Issue: Connectivity and recreational use.....	23
8.4 Issue: Safety.....	23
9 Cedar Lake Parkway-Grand Rounds	24
9.1 Location and Description	24
9.2 Issues: Integrity, flow, and access	24

9.3	Issue: Safety.....	25
9.4	Issue: Noise and air quality.....	26
10	Park Siding Park.....	27
10.1	Location and Description.....	27
10.2	Issue: Access and safety.....	27
10.3	Issue: Visual appeal.....	27
10.4	Issue: Noise.....	27
11	Trail Access at Abbott Avenue S (by new West Lake Station).....	29
11.1	Location and Description.....	29
11.2	Issue: Park and trail access.....	29
12	Northwest Corner of Lake Calhoun Area.....	30
12.1	Location and Description.....	30
12.2	Issue: Park and trail access.....	30
13	Appendix A – Cedar Lake Parkway/ Southwest Transitway.....	32

Transmittal Letter

December 5, 2012



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

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

Phone
612-230-6400
Fax:
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.

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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

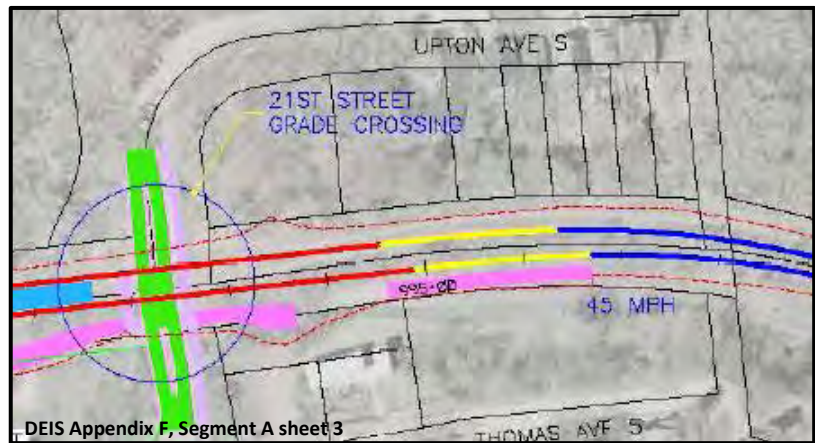
1.1 Location and Description

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.

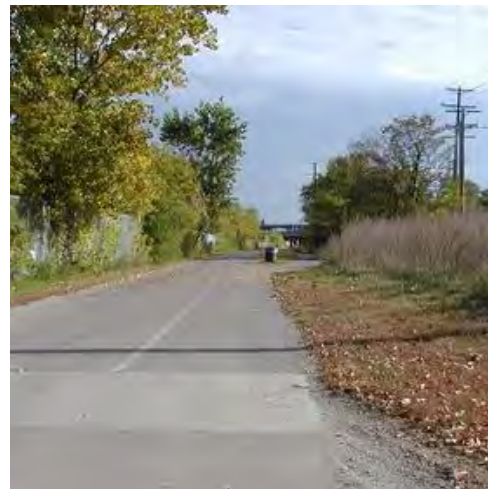


Below are the critical outcomes that the MPRB has adopted and must be addressed in the FEIS and preliminary engineering.

- 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

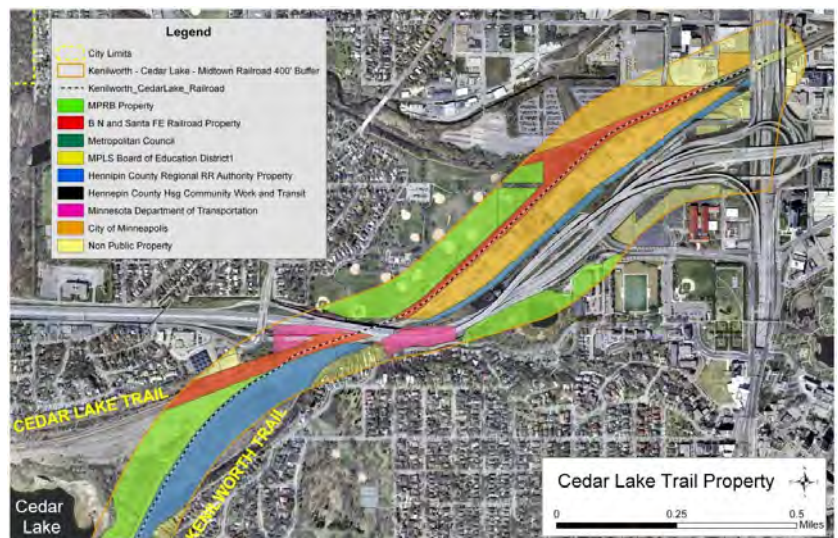
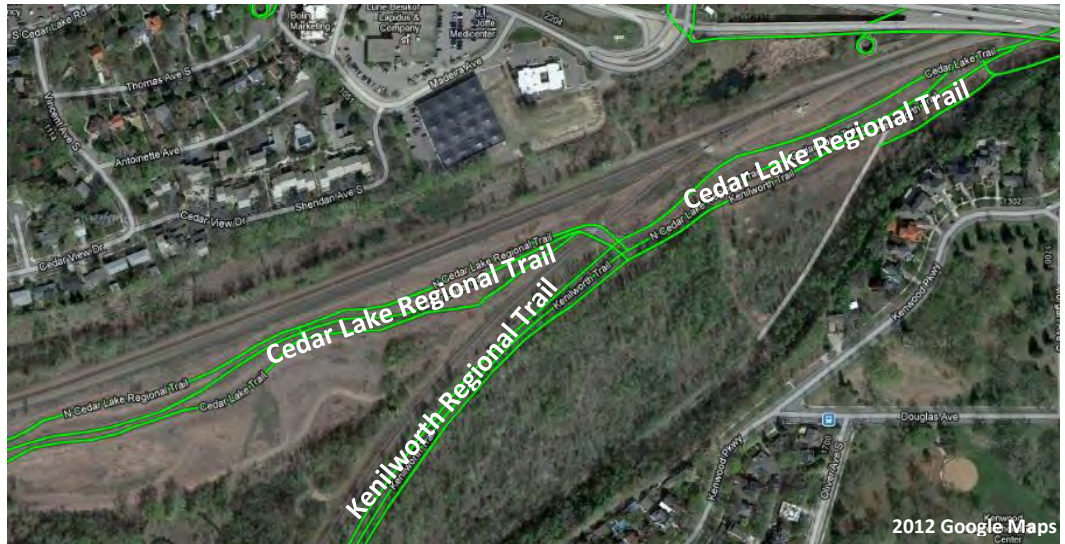
6.1 Location and Description

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

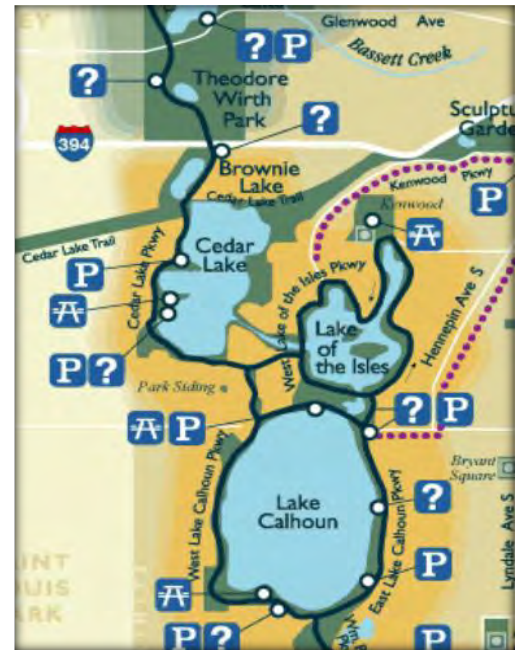
From Kenilworth Regional Trail looking along Kenilworth Channel – City of Lakes Loppet

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

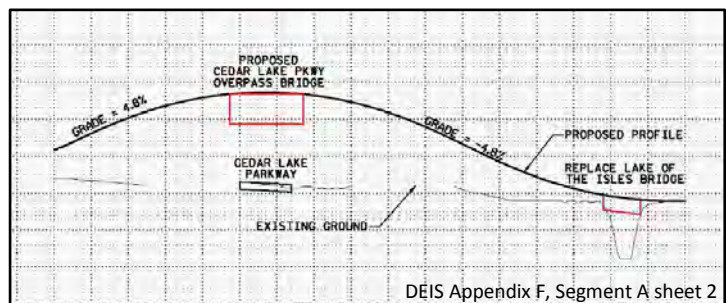
9.1 Location and Description

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.

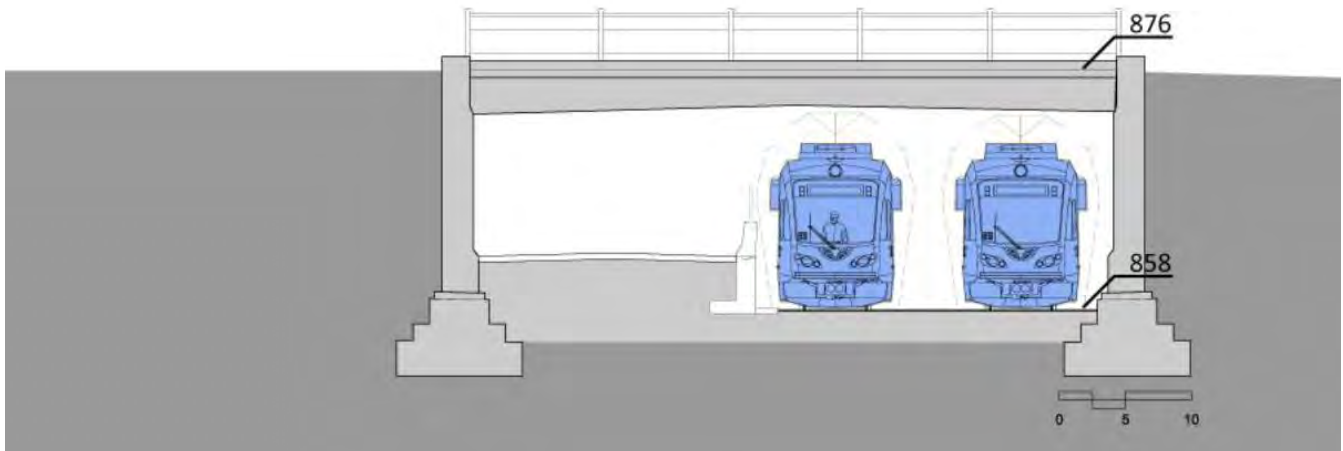
- 12.2.1 **Statement:** Multimodal traffic patterns in a roughly 1/2-mile radius of the West Lake station must be studied in partnership with the street/trail property owners (Hennepin County, City of Minneapolis, MPRB). Deliverables of the study should include traffic volume and flow projections, and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

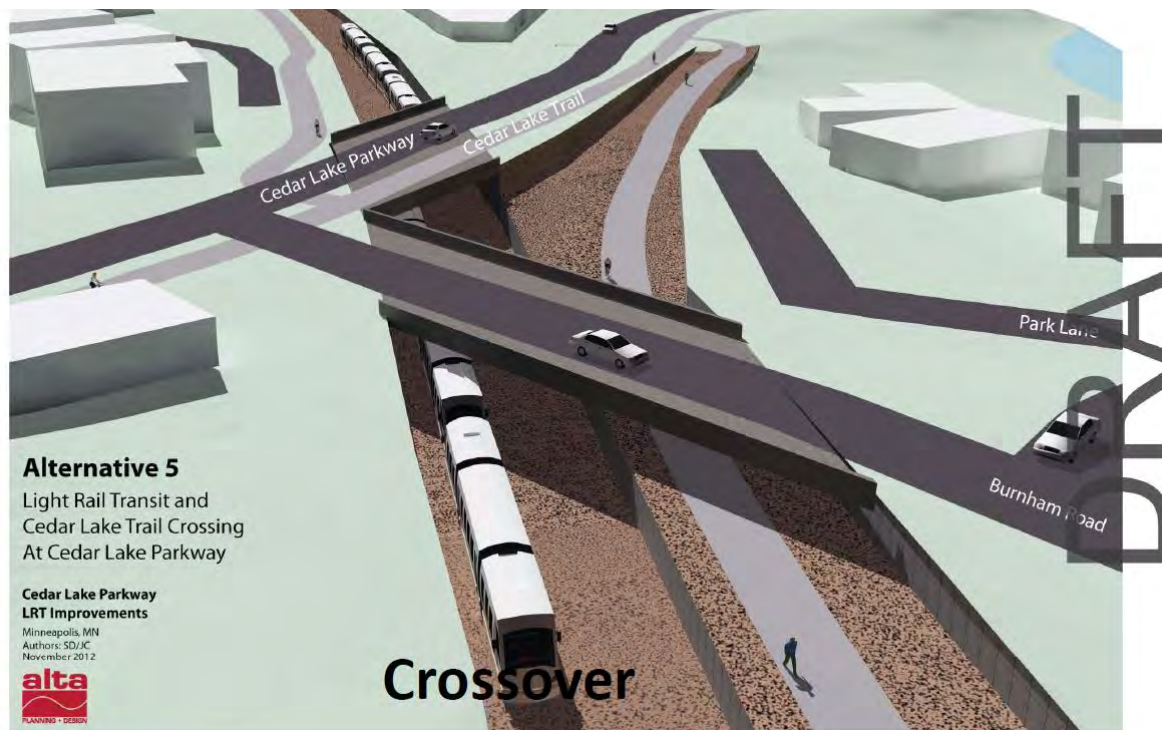
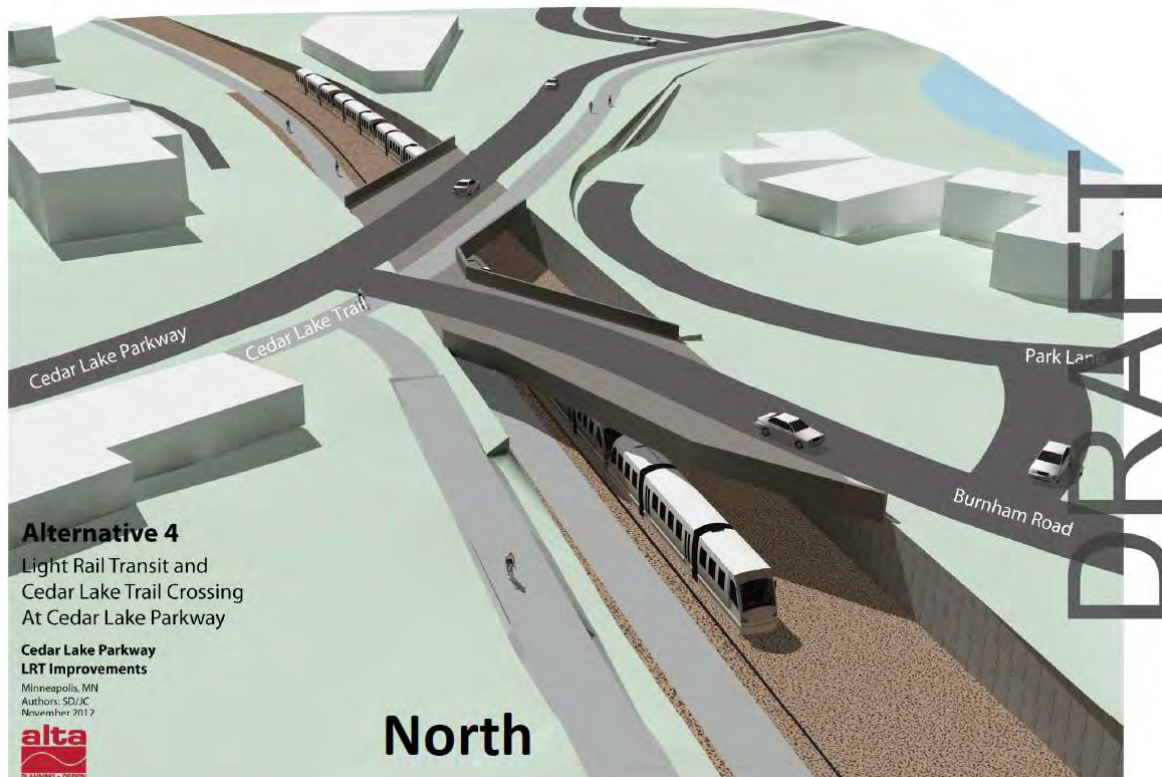
Appendix A is intended to illustrate the concept of lowering the train and trail and bridging Cedar Lake Parkway at the Cedar Lake Parkway/Southwest Transitway intersection. This concept is discussed in Section 9 of this comment letter. The following pages contain a few key images of the analysis conducted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



From: [Haworth, Brooke \(DNR\)](#)
To: [swlrt](#)
Subject: DNR comments-Supplemental DEIS- SW Light Rail Transit
Date: Tuesday, July 21, 2015 5:30:58 PM

Dear Ms. Jacobson,

The Minnesota Department of Natural Resources (DNR) has reviewed the Supplemental Draft EIS for the Southwest Light Rail Transit. We offer the following brief comments.

For the most part we agree with document statements regarding Environmental Effects (the “no effect” determination in the DEIS) for Biota and Habitat, including Threatened and Endangered Species.

- As project designs move forward, we request that consideration be given to identification of high profile areas for wildlife crossings (wetlands, public waters, open park spaces), and that wildlife fencing and turn-back structures be incorporated to minimize wildlife mortality.
- We request that wildlife friendly erosion materials (natural materials, no welded webbing) be used throughout the project, especially around wetland and open water areas, to minimize mortality to small mammals and herpetofauna.
- Before construction begins, we request that an updated DNR Natural Heritage Inventory (NHIS) data review be requested to determine if any new records of rare species have been identified within the project footprint. An NHIS review is considered valid if performed within one year.

Design of public water crossings identified in the document should avoid impacts below the ordinary high water level; if this is not possible, steps to minimize impacts will be required during consideration of DNR public water permits. Unavoidable impacts may be waived to WCA at the DNR’s discretion if deemed appropriate. DNR will continue to follow the progress of the project and provide guidance as needed.

We appreciate the attention given to control of potential groundwater contamination in the document, as well as consideration of groundwater flow and withdrawal. A DNR dewatering permit is required for withdrawals in excess of 10,000 gallons/day. Groundwater models and management plans will be reviewed by DNR staff during the application process.

Thank you for the opportunity to review this document. Please feel free to contact me with any questions.

Sincerely,

Brooke Haworth

Environmental Assessment Ecologist, Central Region
MnDNR Division of Ecological and Water Resources
1200 Warner Road, St. Paul, MN 55106
Phone: 651-259-5755
Email: Brooke.haworth@state.mn.us

From: [Jacobson, Nani](#)
To: [swlrt](#)
Subject: FW: HC Comments to SWLRT Supplemental DEIS
Date: Tuesday, July 21, 2015 5:10:46 PM
Attachments: [HC Comments Southwest SDEIS July 2015 FINAL.xlsx](#)

From: David J Jaeger [mailto:David.Jaeger@hennepin.us]
Sent: Tuesday, July 21, 2015 3:16 PM
To: Jacobson, Nani
Cc: John Q Doan; Debra R Brisk; Alene G Tchourumoff
Subject: HC Comments to SWLRT Supplemental DEIS

Nani.

Attached are comments from Hennepin County's internal review of the SWLRT's SDEIS report.

We appreciate the chance to provide this input and appreciate all of your hard work on the very important project.

Regards, Dave.

David Jaeger

Planning, Policy and Land Management | Hennepin County Public Works
701 Fourth Ave. South, Suite 700, MC L606 | Minneapolis, MN | 55415-1842
direct: 612-348-5714 | cell: 763-478-7319
david.jaeger@hennepin.us

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Southwest LRT Supplemental Draft EIS - Review Form

Reviewed by:

John Evans, Chuck Darnell, Kim Zlimen, Kerri Pearce Ruch, Kristy Morter, Katie Walker, Dave Thill, Ali Durgunoglu, Jim Kujawa, Stacey Lijewski, Dave Jaeger

Date: 7/15/2015

Organization: Hennepin County Public Works

Contact Info: david.jaeger@hennepin.us

Ch./Sec. Number	Page	Comment	Recommendation
3.1.2.12	3-17	The forecast year for modeling should be updated to 2040 as it is expected to be for the FEIS. This should be made clear and reflected as needed throughout the SDEIS.	
		Due to scope and budget reduction, discussion on segments from Southwest Station to Mitchell Station is no longer applicable - will this document be updated or will that be addressed in the FEIS?	
3.2.1.5	3-55	Ensure that mitigation measures for substantial adverse impacts are fully identified and addressed in the FEIS, as stated that they will be in this section of the SDEIS.	
3.2.2.2	3-60	In the first paragraph under "Agency Coordination", "Hennepin County Conservation District" should be changed to "Hennepin County".	
3.2.2.2	3-59 thru 61	4.70 acres of various types of wetland impacts are proposed in 16 wetlands. WCA Rule 8420.0544 specifies that wetlands impacted by public transportation projects in the seven-county metropolitan area must be replaced in the seven-county metropolitan area or in one of the major watersheds that are wholly or partially within the seven-county metropolitan area, but at least one-to-one must be replaced within the seven-county metropolitan area.	Hennepin County recommends that the one-to-one portion of the replacement should be done in Hennepin County.
3.2.2.2	3-61	Floodplain elevations at Purgatory Creek at Technology Drive have not been established. The floodplain is classified by FEMA as Special Flood Hazard Area (SFHA) Zone A.	Floodplain elevations at SFHA Zone A should be estimated through model studies to determine the exact volumetric impact (not by area) in floodplains.
3.2.2.2	3-63	As shown on Exhibit 3.2-5, approximately 13.4 acres of floodplain within the proposed Eden Prairie improvements would be filled by the proposed improvements. The floodplain impact should be estimated in volume.	Mitigation measures are also explained on page 68. Mitigation must be done according to the local government unit's floodplain ordinance. Mitigation usually requires one-to-one volume replacement and should be hydrologically connected to the impact area.
3.2.2.2	3-65	Public Waters and Stormwater Management	Per new state stormwater treatment guidelines, up to 1.1" of runoff originating from all new impervious surfaces must be abstracted.

3.2.5-B, 3.3.5-B & 3.4.5-B	3-93, 3-129, & 3-212	Outreach to Minority and Low-income Populations references the composition of Community Advisory Committee (CAC). It should be noted that CAC membership includes both Met Council and Southwest Community Works, but could then also include policymakers from cities and Hennepin .	
Table 3.2-18	3-96	Parking Impacts are noted at 250 displacements throughout this section. This suggests correlating parking impacts to better understand actual parking impact as is done in subsequent sections.	
3.2.5	3-98	In Parking section, 4th sentence, LPS should be LPA	
3.3.1.1	3-102	The county disagrees with the statement that the OMF would not "influence growth patterns and neighborhood characteristics on adjacent land". The OMF could be within sightlines of the station and future redevelopment along 17th Avenue in Hopkins and Minnetonka, which would have an indirect impact on these areas.	
3.3.1.1	3-104	Under "Mitigation Measures" - visual impacts of OMF and its operations should be addressed. Mitigation should include measures similar to those being used at other identified locations such as landscaping, visual treatments, and continuity with LRT structure designs.	
3.3.2	-	While technically part of the Shady Oak station and not the Hopkins OMF site, what, if any, additional environmental impacts might be realized by the addition of 300+ temporary parking stalls on the property to the east of the OMF?	
3.3.2.2	3-111	0.7 acres of type 3 wetland will be impacted.	Hennepin County recommends that the one-to-one portion of the replacement should be done in Hennepin County.
3.3.2.2	3-112	Approximately 0.61 acre of MnDNR-mapped floodplain would be filled as a result of the proposed Hopkins OMF. Type of floodplain designation needs to be specified, the impacts must be measured in terms of volume and replaced according to MDNR and local regulations.	Mitigation should be hydraulically connected to the impact area.
3.3.2.2	3-112	Public Waters and Stormwater Management	Per new state stormwater treatment guidelines, up to 1.1" of runoff originating from all new impervious surfaces must be abstracted.
Table 3.3-9	3-130	Table lists acquisitions and displacements. Will this number be updated to reflect additional acquisitions disclosed in Spring 2015? And if so, does that change the finding of no impact on EJ populations?	

3.3.2.3	3-117	1st paragraph, last sentence - add petroleum waste to list, since this is a separate category pursuant to federal statutes.	
3.3.2.3 B.	3-117	Given the contamination issues and the proximity of the methane source (landfill), vapor mitigation features may need to be incorporated into the OMF buildings.	
3.3.2.3 B.	3-119	Soil vapor samples, analyzed for volatile organic compounds, should be a part of Phase II investigations since the landfill and other high risk sites could be sources of these compounds as well.	
3.3.2.3 C.	3-120	Vapor barriers and venting systems may need to be part of the Mitigation Measures depending on soil vapor sampling results.	Given the proximity of the potentially significant methane source (landfill), it may be prudent to install a vapor mitigation system as part of the building, regardless of soil vapor sampling results, should vapor conditions change over time. It is cheaper to incorporate such as system during building construction than to retrofit an existing building.
3.3.4.1		In Existing Conditions section Excelsior Avenue should be changed to Excelsior Boulevard.	
3.4.1.5	3-168	Ensure that mitigation measures for substantial adverse impacts are fully identified and addressed in the FEIS, as stated that they will be in this section of the SDEIS.	
3.4.2	3-181	Figure 3.4-6, moderate and severe noise impacts north of the Kenilworth channel are overlapping on the map and difficult to read at this scale.	Perhaps an inset could be provided since this doesn't appear to be addressed in greater detail in Appendix H: Noise and Vibration Memoranda either?
3.4.2.2	3-173	0.5 acres of various types of wetlands will be impacted.	Hennepin County recommends that the one-to-one portion of the replacement should be done in Hennepin County.
3.4.2.2	3-176,177	Public Waters and Stormwater Management	Per new state stormwater treatment guidelines, up to 1.1" of runoff originating from all new impervious surfaces must be abstracted.
3.4.2.1 B.	3-170	Since the impact to lake levels has been raised as a concern with regard to the tunnel, it may be worthwhile to compare the 190,000 gallons/year pumping rate to the overall lake volumes, which should demonstrate that the pumping rate is miniscule compared with lake volumes. Another approach would be to compare the tunnel area to the recharge area for the lakes.	

From: [Allwood, Paul \(MDH\)](#)
To: [swlrt](#)
Cc: [Kelly, James \(MDH\)](#); [Bell, David \(MDH\)](#); [Ehlinger, Ed \(MDH\)](#)
Subject: MDH Comments
Date: Tuesday, July 21, 2015 5:10:02 PM
Attachments: [MDH Comment Letter South West LRT SDEIS.pdf](#)

MDH comments are hereby submitted on the SW LRT SDEIS. Please contact David Bell if you have questions. Regards,

Paul Allwood
Assistant Commissioner
Minnesota Department of Health
Phone: 651-201-5711

Administrative Assistant
Toni Gillen
651-201-4817
Toni.Gillen@state.mn.us



Protecting, maintaining and improving the health of all Minnesotans

July 21, 2015

Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit – Southwest LRT Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson,

Thank you for providing the Minnesota Department of Health (MDH) with the opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit project (SW LRT).

Health begins in the environments where we live, learn, work, and play. Transportation projects, such as highways, public transit and sidewalks, shape these environments. The Southwest Light Rail Transit project offers real potential to improve health for communities living near transit stations. People from all over the region who travel on the light rail line could also benefit. The new transitway could have health benefits for communities by improving physical activity levels, job access, housing and transportation costs, traffic safety, education access, and access to healthy food.

The following comments highlight these areas of potential health improvement and MDH also wants to stress that a project of this magnitude must be planned carefully so as to maximize these potential benefits.

Health Equity

- ❖ Research indicates that 60% of our health status is influenced by social and environmental conditions and only 10% is influenced by health care¹. Access to transportation is one of the social and environmental conditions that influence health. Ensuring equal access to the SW LRT for all people will help maximize the potential health benefits resulting from this project.

- ❖ In Hennepin County, low-income communities and communities of color have higher rates of preventable health problems such as obesity and type II diabetes than do

¹ Schroeder, S. A. (2007). We can do better—improving the health of the American people. *New England Journal of Medicine*, 357(12), 1221-1228.

whites and higher income populations. These differences in health are the result of a wide set of forces: economics, social policies, politics, and our built environment. It is important that the health-promoting benefits of the transitway reach low income communities and communities of color. This is particularly important along the Eden Prairie segment of the SW LRT where these communities are more concentrated along the proposed route than in greater Eden Prairie and Hennepin County. The health impacts of the SW LRT on these populations will depend on efforts to ensure that these communities have a healthy environment in which to live, learn, play, and work and this includes ensuring their access to light rail.

- ❖ Transportation planning and land use regulations need to be designed carefully to ensure that everyone benefits, including low income people and people of color. However, if planned poorly, research has shown that transit investments can result in more expensive housing, more wealthy residents, and higher vehicles ownership, all of which can price out core transit users, such as renters and low-income households.

Economics and Jobs

- ❖ Land use changes toward higher density and mixed-use development promotes job growth and economic opportunity along the SW LRT route. When people have quality jobs that provide a living wage they tend to live longer and have better physical and mental health. Many factors affect whether a person is employed and what type of job they have. One of those factors is transportation.
- ❖ The SW LRT should help make transportation more affordable because neighborhoods with access to transit, walkable streets, and a variety of services have lower transportation costs. Households that have lower transportation costs have more left over in their budgets for resources that promote health like nutritious food and health care. Budgets that are less burdened by transportation costs can also help to reduce stress and prevent homelessness.

Housing

- ❖ New fixed rail transit investments tend to lead to greater housing demand and increased land values around revitalized transit stations. While this can lead to an increase in housing options and economic benefits, it also creates the potential for rents and housing costs to rise, potentially leading to the involuntary displacement of low-income residents. This may disproportionately affect persons of color along the transit route, who are statistically more likely to be low-income than whites. Displacement can have several negative health outcomes, including increases in infectious disease, chronic disease, stress, and impeded child development.

- ❖ Increases in rent and home costs along the SW LRT route could lead to a decrease in racial diversity. Due to the racial income gap in the Twin Cities, incoming households that will be able to afford higher home prices along the route will likely be white. Preserving existing affordable housing and supporting the development of new affordable and mixed-income housing near transit locations could help ensure transit-dependent, minority and low-income communities have access to the new SW LRT line and ultimately experience improved health. This appears to be particularly important along the Eden Prairie segment of the SW LRT as both minority communities and low-income communities are higher here than in greater Eden Prairie and Hennepin County.

Education Access

- ❖ The SW LRT will bring riders close to Dunwoody College of Technology and Minneapolis Community and Technical College as well as other educational and vocational training institutions in the project area. When people have more education they have better chances of securing jobs that pay well and do not expose them to dangerous or unhealthy conditions. They also gain knowledge and skill that help them access health information and resources. The Health Impact Assessment for the Bottineau Transitway² reported that some students living in Hennepin County find that limited car access and high transportation costs are barriers to attending college. The SW LRT could assist by eliminating this barrier for some prospective students living or attending schools along this proposed route.

Accessibility/Physical Activity

- ❖ Exercise is vital for good health; however, about half of adults and three-quarters of children living in Hennepin County do not get recommended levels of exercise³. Research shows that streets that are safe and comfortable for pedestrians and bicyclists encourage people to get exercise as part of their daily routine.
- ❖ Transit accessibility is especially critical for lower-income residents and other transit dependent populations who rely on transit to access their basic needs including work, groceries, and medical care. In Hennepin County it is estimated that people of color are twice as likely as whites to rely on public transportation for their work commute⁴.
- ❖ The SW LRT could lead to increases in ridership, residents, and commercial destinations along this new route. This increase in density along the route could cause vehicular traffic to surge and, when combined with the increase in ridership, these factors could

² 2013 Hennepin County Bottineau Transitway Health Impact Assessment: <http://www.hennepin.us/~media/hennepinus/residents/transportation/bottineau-transitway/HIA%20Full%20Report%20Final%2012192013.pdf>

³ From Hennepin County 2010 SHAPE survey: <http://www.hennepin.us/SHAPE>

⁴ Combined from commuting statistics for race/ethnicity of individuals in the 2009-2013 American Community Survey 5-year Estimates for Hennepin County: http://factfinder.census.gov/faces/nav/jsf/pages/guided_search.xhtml

put pedestrians and cyclists at a greater risk for injuries related to collisions. Therefore, pedestrian infrastructure and bicycle connection improvements are an important consideration throughout the SW LRT route. Such improvements not only help ensure ease of use but also provide health benefits by encouraging people to be active and through improved safety.

- ❖ A new light rail line is only one piece of a neighborhood transportation system and it is also necessary to promote the use of, and access to, successful bus service and bicycle and pedestrian infrastructure for a truly sustainable transportation system.

General Comments

- ❖ Two Health Impact Assessments (HIAs) have been completed for other sections of the Twin Cities metro transit light rail lines. These HIAs provide valuable information about transportation projects of this scale and scope and describe how light rail transit contributes to the health and well-being of many different populations. The Bottineau Transitway HIA⁵ and the Central Corridor HIA⁶ can both be accessed on-line and MDH encourages the Metropolitan Council to consult these resources when making project decisions for the SW LRT.
- ❖ Transit oriented development, such as light rail transitways, can benefit communities by providing opportunities for people to live, work, and play without having to get into a car. This can reduce roadway congestion and air pollution, it can increase physical activity and provide access to jobs and other opportunities for transit dependent households.
- ❖ Investments in station areas and an increase in residents along the SW LRT route could encourage the placement of grocery stores nearby. When people have access to healthy food options they are better able to include healthy food in their diets. Good nutrition is vital to health, disease prevention, and childhood development.

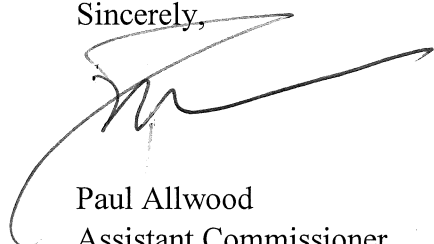
Health starts where we live, learn, work, and play. To create and maintain healthy Minnesota communities, we have to think in terms of health in all policies. Thank you again for the opportunity to provide comments on this Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit project. Feel free to contact David Bell at (651) 201-4907 or david.bell@state.mn.us if you have any questions regarding this letter.

⁵ 2013 Hennepin County Bottineau Transitway Health Impact Assessment:
<http://www.hennepin.us/~media/hennepinus/residents/transportation/bottineau-transitway/HIA%20Full%20Report%20Final%2012192013.pdf>

⁶ 2011 Healthy Corridor for All:
http://www.policylink.org/sites/default/files/HEALTHYCORRIDOR_SUMMARY_FINAL_20120111.PDF

Nani Jacobson
Southwest Light Rail Transit
Page 5
July 21, 2015

Sincerely,

A handwritten signature in black ink, appearing to be 'PA', with a long horizontal stroke extending to the right.

Paul Allwood
Assistant Commissioner
Minnesota Department of Health
PO Box 64975
Saint Paul, MN 55164-0975

From: [Jacobson, Nani](#)
To: [sw/rt](#)
Subject: FW: Minneapolis SDEIS comments
Date: Tuesday, July 21, 2015 5:05:38 PM
Attachments: [DOC071715-07172015154842.pdf](#)

-----Original Message-----

From: Pflaum, Donald C. [<mailto:Donald.Pflaum@minneapolismn.gov>]
Sent: Tuesday, July 21, 2015 3:13 PM
To: Lamothe, Craig; Jacobson, Nani
Cc: Miller, Paul D.; Hager, Jenifer A; Jack Byers
Subject: Minneapolis SDEIS comments

Craig/Nani,

Please see the attached SDEIS comments from the City of Minneapolis. You should also be receiving the attached letter via US mail.

Thanks

-Don
612-673-2129

7/16/2015

Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit Southwest LRT Project Office
6465 Wayzata Blvd.
Suite 500 St. Louis Park, MN 55426

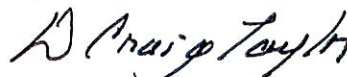
Dear Ms. Jacobson,

The City of Minneapolis appreciates the ability to comment on the Supplemental Draft Environmental Impact Statement for the Southwest LRT Corridor (Green Line Extension) project. The attached comments were presented to the Transportation and Public Works Committee of the Minneapolis City Council on July 14, 2015 and will be approved by the full City Council on July 24, 2015. Please let our staff know if you have any questions regarding the comments.

Sincerely,



Steven A. Kotke
Director of Public Works



D. Craig Taylor
Director of Community Planning and
Economic Development

**Attachment #2 - SW LRT
Supplemental Draft Environmental
Impact Statement Comments
City of Minneapolis
June 2015**

City of Minneapolis comments pertaining to the SW SDEIS are split into two categories; general comments that highlight the City of Minneapolis position on a particular topic and specific comments that include more technical detail. Specific comments pertain to a given chapter or page within the SDEIS document.

City of Minneapolis comments on the Supplemental DEIS are based on three principles:

1. Comments are based on unresolved topics and the need to clarify, correct, or mitigate an issue in preparation for the FEIS. Comments are also intended to inform the final design, project specifications, construction means/methods, and long-term operation of the line. The City will not be commenting again on past decisions such as LRT alignment, freight alignment, or scope/budget. **The City's perspective has been captured in previous council actions including the municipal consent resolution adopted on August 29, 2014.**
2. Comments are based on the SDEIS, but also reflect the city's understanding of recent changes to the scope and budget recommendations made by the July 1, 2015 Corridor Management Committee meeting and adopted by the Metropolitan Council on July 8, 2015.
3. The City of Minneapolis continues to support the **Southwest LRT project contingent on adherence to the Memoranda of Understanding reached between the City of Minneapolis and Met Council and between the City of Minneapolis and Hennepin County, both of which were adopted on August 29, 2014.** Comments are intended to lessen the negative impacts to residents and businesses near the corridor and to improve the quality of the project.

It should be noted that these comments are supplemental to the previously submitted December 2012 City of Minneapolis DIES comments and to the August 2013 City of Minneapolis SDEIS scoping letter to the Southwest Project Office.

The city appreciates the work of the Metropolitan Council to address the concerns that the city has raised to date. The City of Minneapolis will continue to work closely with the Southwest LRT Project Office and with other partnering agencies to help make this project a long-term success.

General Comments:

Below are several general comments pertaining to the SDEIS. These topics require further analysis, clarification, or detail and need to be addressed prior to the completion of the FEIS:

Ridership – It is difficult to understand station ridership data in this document. It is very time consuming to cross-reference data between the original DEIS and the SDEIS. Data is often

presented, compared, and contrasted in different baseline and forecast years. It would be helpful for the document to include a large table that shows accurate ridership values for each station. The data needs to be based on the latest regional model and the table needs to include opening day (2020) projected ridership, 2040 projected ridership, reverse commute ridership, new transit trips, and transit dependent user ridership.

Construction Impacts – Construction impacts pertaining to the shallow tunnel design such as noise and vibration are discussed in the SDEIS. The SDEIS states that “Construction noise impacts are expected to be localized, temporary, and transient.” While in general this may be true, the document minimizes and understates impacts of the shallow tunnel to residents. While the City of Minneapolis recognizes that additional design work and construction methods will better inform the extent of these impacts, the known impacts should be better identified in the SDEIS. These impacts will increase with proximity to the physical improvements. It is understood that additional details regarding potential short-term noise impacts will be evaluated further and provided in the forthcoming FEIS, based on the equipment, duration, and type of work effort. These details and the respective short-term impact determinations need to be provided when additional design and construction information is available not when the FEIS is published.

Given the close proximity of homes and townhomes to the construction work, effort must be made to dampen or minimize the noise and vibration caused by sheet pile driving. There will also be tree loss along the corridor. The means and methods for removing trees are not defined in the DEIS. It should be noted that there is concern about potential noise created by chain saw activity in addition to wood chipping. Hours of construction operation must be limited to ensure that residents are not disrupted at night; the City of Minneapolis Noise Ordinance will be enforced restricting hours of operation on week nights, weekends, and Holidays.. In addition to noise and vibration, light pollution must be considered when securing the project at night. An effort must be made by the project and its contractors to control dust, to maintain safe truck routes, to comply with truck weight limits, and to follow jake breaking laws.

The project needs to identify proper mitigation for properties impacted by construction. The project needs to develop and implement a construction management plan that addresses hours of operation, access routes, BMPs for mitigating dust and debris on public streets and private property. The City of Minneapolis would like to be consulted in the development of this plan.

Shallow Tunnel; Environmental Issues – 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 needs to be a section in the FEIS on the impact to the tunnel on existing utility infrastructure and what mitigation will be provided.

Freight Rail Safety - There must be coordination between the SPO and the railroad to minimize the risk of a derailment, especially if trains are carrying hazardous materials. Emergency vehicle access of the construction site must be coordinated prior to construction. The SPO shall include

both the Minneapolis Fire Department and the Police Department in future Emergency Response planning for both the construction period and long term operations. Members of the public have expressed great concern regarding the risks of a train derailment during construction. The SDEIS needs to address these risks.

LRT Operation - The document states that there will be emergency vehicle delays of approximately 50 seconds, 12 times per hour at 3 at-grade locations within Minneapolis and St. Louis Park once the LRT opens for service. Alternate routes for emergency vehicles may need to be suggested. The SPO shall include both the Minneapolis Fire Department and the Police Department in future Emergency Response planning for both the construction period and long term operations. The City of Minneapolis is pleased that improvements to the tunnel ventilation system will be made to ensure passenger safety. As previously stated in the DEIS comments, it is important that noise from LRT bells, whistles, and horns be evaluated and minimized. While some warning devices are required by federal law, policies and procedures regarding some rail operations are local (at the discretion of the Metropolitan Council).

Visual Impact - The City of Minneapolis agrees that the project will result in a substantial level of visual impact in the Kenilworth corridor. The impact must be mitigated and the corridor improved in the manner described in the memorandum of understanding between the Metropolitan Council and the City of Minneapolis. The City looks forward to continued conversations with the project office and the community regarding the restoration of the corridor, and expects these measures to be included in the FEIS and implemented by the project.

Regional Transit Connections – A significant amount of work has occurred within the region to advance other transit projects since the DEIS was published in 2012. This includes the Midtown Greenway Corridor, which was the subject of an Alternatives Analysis document. This project needs to be discussed more within the SDEIS since track accommodations at the West Lake Street station have been made for that project. The Lake Street ABRT project was also identified as part of that study and makes a direct connection to the Green Line at West Lake Street. The C-Line along Penn Avenue has also advanced to the design phase. As proposed, customers using the C-Line can transfer to the Green Line at the proposed Royalston Avenue Station. Proposed bus connections at the Van White station and improved sidewalks near the Penn Station will also help transit dependent riders get to destinations along the entire Green Line travelshed. Mention of these projects within the SDEIS would be helpful.

Specific Comments (By Chapter):

Executive Summary

Table ES-1 on page ES-15 states that there are 67 moderate and 3 severe noise impacts. More information is needed on how these properties will be mitigated.

Table ES-1 on page ES-16 states that 6 high-risk environmental sites could require remediation prior to construction, that there could be potential spills during construction, and that sites with existing contamination could be encountered during construction. More information is needed regarding the identified sites and what will be done (and how long it takes) to remediate a site or situation.

Chapter 1 –Purpose and Need

Page 1-1 – “The Southwest LRT Project will improve access and mobility to the jobs and activity centers in the Minneapolis central business district, as well as along the entire length of the corridor for reverse-commute trips to the expanding suburban employment centers.” When looking at the FTA’s 2014 response to the SW Corridor scope, suburban land use was one of the areas identified for improvement. By increasing corridor density, the project will become more competitive at the federal level. As mentioned in the general comments, calculating the number of reverse commute riders is an important equity measurement that needs to be shown in a table station by station.

Chapter 3 –Affected Environment, Impacts, and Mitigation

Section 3.4.1.5 (Visual Quality and Aesthetics) analyzes the anticipated changes to visual quality from six viewpoints between the West Lake Street and 21st Street stations. The SDEIS assigns a substantial level of impact for three of these:

- Viewpoint 2, looking north near Lake Street
- Viewpoint 3, looking north toward the tunnel portal south of the canal crossing
- Viewpoint 4, view from the bike trail at the south side of the channel crossing

The City of Minneapolis agrees that the project will result in a substantial level of visual impact in these areas. The impact must be mitigated and the Kenilworth corridor improved in the manner described in the memorandum of understanding between the Metropolitan Council and the City of Minneapolis. The City looks forward to continued conversations with the project office and the community regarding the restoration of the corridor, and expects these measures to be included in the FEIS and implemented by the project.

The City of Minneapolis has the following concerns about visual quality and aesthetics not covered in the SDEIS:

- The drawings and discussion of the tunnel portal near the channel do not acknowledge that among the substantial visual impacts are a six-foot concrete crash wall adjacent to the freight tracks and an eight-foot fence between the portal and the bike trail. The FEIS should state these facts explicitly and include a level of mitigation that is commensurate with the substantial level of impact.
- While the SDEIS includes an analysis of the area around the tunnel portal near the channel, it does not discuss the tunnel portal near Lake Street. The City of Minneapolis expects that equal attention will be given to the mitigation of visual impacts at both tunnel portals.
- The project will substantially impact visual quality and aesthetics between the 21st Street and Penn Avenue stations, but an analysis of that impact is not included in the main body of the SDEIS. Previous work by the Metropolitan Council quantifies the anticipated tree loss in the Kenilworth corridor under the since-discarded two-tunnel option. Tree loss and a change to aesthetics will remain an issue with the construction of LRT at grade in this segment, and the City of Minneapolis expects the same level of restoration and improvement in this segment as the West Lake to 21st segment.

Section 3.4.2.3 (Noise) and Section 2.4.2.4 (Vibration) identifies both severe and moderate noise and ground-borne noise impacts in the Kenilworth corridor. The City of Minneapolis expects both severe and moderate noise and ground-borne noise impacts to be mitigated. We look forward to working with the project office on the development of these mitigation measures.

Page 3-12- It is not clear whether all relevant noise issues will be covered in the FEIS document. It is important to be clear about what studies are remaining in addition to what has been done to date.

Page 3-17- The SDEIS uses 2030 model information when the CMC and staff have been using projected 2040 model numbers to make decisions. It is important that the SDEIS include the 2040 data to help justify the context of these decisions.

Page 3-18- The operating assumption has always been that 7.5 minutes headways will be used. It is clear now that 10 minute headways will be used to match Central Corridor frequency. The SDEIS needs to state whether or not 7.5 minute headways will work in the future.

Page 3-20 - “As noted in Section 2.5 of this Supplemental Draft EIS, the LPA would result in short-term and long-term shifting of the freight rail tracks prior to tunnel construction in the Kenilworth Corridor. Changing the physical operations of freight railroads can result in community impacts such as running freight trains at night. While TCW is allowed to operate at night; they currently choose to run during the day. They also choose to run at 10 mph instead of 25 mph. It is important that the agency partners continue to work with the railroad to try to minimize the number of night trains they run and the frequency and speed of those trains to maintain quality of life for residents.

Page 3-21 Freight Table 3.1-5 - It should be noted that noise and vibration analysis modeling was done using 10mph vs 25mph. We support that assumption since that is the current operating speed of trains in the corridor.

Pages 3-23 Table 3.1-6 – This table identifies many upcoming mitigation elements not included in the SDEIS. The City of Minneapolis is very interested in reviewing and commenting on all future plans and mitigation efforts identified in the DEIS and SDEIS prior to the issuance of the FEIS, these include but are not limited to:

- Construction Communication Plan
- “Forthcoming aesthetic guidelines”
- Groundwater Management Plan
- Noise Mitigation Plan
- Vibration Mitigation Plan
- Section 106 review

Page 3-26 Bicycle & Pedestrian - “Because there would be no long-term adverse impacts from the LPA on bicycle and pedestrian facilities, no long-term mitigation measures have been identified” Given that the Cedar Lake Trail Bridge has been eliminated from the project scope, it is important to mitigate any risks associated with crossing three rail tracks (two light rail tracks

and one freight rail track). It is recommended that gate arms be considered at the trail crossings give the high trail counts.

Page 3-27 Environmental Justice. The DEIS used 2000 Census data and the SDEIS uses the American Community Survey (ACS) from 2007-2011 to identify low income populations. More recent ACS data is available 2009-2013. The City of Minneapolis suggests that the most recently available data is used to determine environmental justice compliance.

Page 3.135 – Table 3.4-1, Summary of Findings: For the Public Waters and Stormwater Management Sub-category of the Water Resources Category, please add, Stormwater runoff would be treated to meet local requirements.

Page 3-136 Section 3.4.1.1 Land use . The list of planning documents consulted to inform the Land Use section does not include The Minneapolis Plan for Sustainable Growth (2009), the City’s Comprehensive Plan. It also does not include the Midtown Greenway Land Use and Development Plan (2007). These plans provide general and site specific guidance for land use and development intensity in Minneapolis. The City of Minneapolis is concerned that the oversight in listing the plans equates to an oversight in reviewing the plans and understanding their relevant recommendations. This impacts the Land Use and Economic impacts analysis in the SDEIS. The City of Minneapolis requests that these documents and their relevant guidance be reviewed and considered where relevant in the FDEIS.

Page 3-138 – The City of Minneapolis does not support park and rides within the city limits. The City of Minneapolis appreciates the attention the SPO staff has given to bicycle and pedestrian infrastructure approaching each of the Minneapolis stations. Careful attention to this detail will increase transit ridership and will promote TOD.

Page 3-139 Section 3.4.1.1, Long Term indirect Land Use Impacts. The SDEIS makes the following statement regarding redevelopment potential and land use changes: “While some redevelopment within the West Lake 21st Street, and Penn Station areas would be possible, land uses surrounding the stations would be expected to generally remain unchanged because of the relatively high level of existing development in those areas.” The West Lake Street station is adjacent to nearly 14 acres of single story shopping center development. The City has adopted policy direction (Midtown Greenway Land Use and Development Plan -2007) that calls for mixed use transit oriented development of five or more stories. Additionally, at the Penn Station along Madeira Avenue and Wayzata Boulevard there is approximately 3.5 acres of low scale commercial and industrial development. The Bryn Mawr Land Use Plan, adopted by the City in 2005, calls for mixed use development. For both the West Lake and Penn stations, these are significant areas of potential changes and intensification of the uses which the SDEIS does not recognize.

Page 3-168 – 3.4.2.1 It is stated, “Construction activities and potential light rail-related improvements both have the potential to affect groundwater by potentially changing the flow of or contaminating groundwater within the project vicinity.” Please REPHRASE to add the potential of changing the flow of previously contaminated groundwater, such as, “. . . by

potentially changing the flow of groundwater (including previously contaminated groundwater if present), or contaminating groundwater, within . . .”

Page 3.169 – 3.4.2.1 - It is stated that groundwater removal would be required during construction of the light rail. Please identify if groundwater removal is expected to be required after completion of the tunnel in order to keep it functional. Other sections of the document appear to indicate this.

Page 3.169 – It is highly recommended that more accurate methods be utilized to determine the high groundwater elevation in the location of the tunnel. Typical soil borings may not be very reliable in this regard. If any post-construction groundwater discharges are proposed to the City of Minneapolis sewer systems, the City of Minneapolis will require the discharges be quantified based on the anticipated high groundwater elevation on the site.

Page 3.170 – Discharge of groundwater from the internal tunnel to the City of Minneapolis sanitary sewer will require additional review. Any proposed groundwater discharges will need to be quantified and testing of the groundwater for the presence of contaminants will be required. It should not be assumed that discharge to the City of Minneapolis sanitary sewer system will be granted.

Page 3.170 – It is the expectation that any waterproofing that is necessary in order to limit groundwater infiltration into and, in turn, groundwater discharges from the tunnel be maintained for the life of the improvements. It is recommended that the maintenance of any waterproofing proposals be thoroughly evaluated and selected with this in mind.

Page 3-170 – Footnote 34 addresses discharge as a result of a larger than 100-year storm event from tunnel portals. The proposed location(s) and rate(s) would need to be reviewed and approved by the City of Minneapolis.

Page 3.172 – The filtration tanks, infiltration basins or other means identified in The Risk of Groundwater Contamination during Construction section would also need to be reviewed and approved by the City of Minneapolis. The discharge as a result of a larger storm event would also need to be approved by the City of Minneapolis.

Page 3.172, C. Mitigation Measures – The groundwater management plan must also be reviewed and approved by the City of Minneapolis.

Page 3.177, list of potential BMPs, bullet 7 – straw bales are not allowed as BMPs in Minneapolis.

Page 3.179, C. Mitigation Measures – add that Stormwater runoff (long-term) will need to be in compliance with MPCA NPDES General Construction Permit Section III.D., PERMANENT STORMWATER MANAGEMENT SYSTEM, and will need to be reviewed and approved by the City of Minneapolis under Minneapolis Code of Ordinances Chapter 54, Stormwater Management.

Page 3-184 – The SDEIS makes the following statement regarding short term noise and vibration “Construction noise impacts are expected to be localized, temporary, and transient. These impacts would increase with proximity to the physical improvements. Additional details regarding potential short-term noise impacts will be evaluated further and provided in the forthcoming Final EIS, based on the equipment, duration, and type of work effort. These details and the respective short-term impact determinations will be provided when additional design and construction information is available.” While it is recognized that substantially more design work is ahead, many areas of major infrastructure, such as a shallow tunnel, are known and should be listed in the SDEIS.

Page 3-186 – The SDEIS concludes that “the results of ground-borne noise impacts for residential land use are presented in Table 3.4-14. There would be no vibration or ground-borne noise sensitive institutional land uses in the St. Louis Park/Minneapolis segment.” This statement needs to be substantiated or clarified.

Page 3-200 - Among the potential strategies for improving traffic operations at intersections is the modification of light rail at-grade crossings from preemption to a priority strategy. It is the understanding of the City of Minneapolis that priority signalization (not preemption) will be the standard for all Minneapolis intersections.

Chapter 4 –Public and Agency Coordination

Page 4.21 – Table 4.5-2, Preliminary list of Required Permits/Approvals and Reviews (by Agency Jurisdiction)

Under City of Minneapolis, add Stormwater Management – Approval. (Per Minneapolis Code of Ordinances Title 3 Chapter 54 Stormwater Management)

From: [Meg McMonigal](#)
To: [swlrt](#)
Cc: [Jacobson, Nani](#)
Subject: SDEIS Comments from St. Louis Park
Date: Tuesday, July 21, 2015 1:46:19 PM
Attachments: [SDEIS Letter and Comments City of St. Louis Park 7-21-15.pdf](#)

Attached are City of St. Louis Park's SDEIS comments. A hard copy will be delivered as well.

Meg J. McMonigal

Principal Planner | City of St. Louis Park

5005 Minnetonka Blvd, St. Louis Park, MN 55416

Office:952-924-2573

mmcmonigal@stlouispark.org

www.stlouispark.org

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July 21, 2015

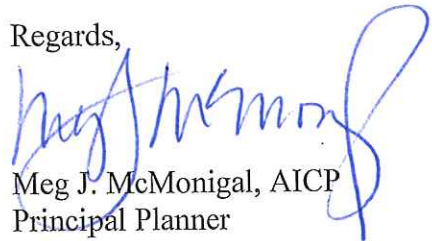
Nani Jacobson
Assistant Director, Environmental and Agreements
Metro Transit – Southwest LRT Project Office
6465 Wayzata Blvd. Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson,

The City of St. Louis Park appreciates the opportunity to comment on the Supplementary Draft Environmental Impact Statement (SDEIS) for Southwest LRT. Enclosed are the City's comments.

Please contact me if you have any questions or need clarifications.

Regards,



Meg J. McMonigal, AICP
Principal Planner

Enc.



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City of St. Louis Park

Supplementary Draft Environmental Impact Statement Comments (SDEIS)

July 21, 2015

These comments on the SDEIS are in addition to the comments on the Southwest Transitway DEIS submitted by the City of St. Louis Park December 31, 2012. They are not intended to replace or diminish the previous City of St. Louis Park comments. These comments focus exclusively on the SDEIS.

1. Noise impacts:

The SDEIS notes noise impacts near the Wooddale Station, at the Camarata Apartments and 6 unspecified locations near 37th Street and the rail corridor. These 6 locations need to be specifically identified for the City and the property owners. There is not an indication of what types of mitigation could be utilized for severe and moderate impacts. There is also not any indication if/when/how the property owners will be notified of the impacts and the proposed mitigation for their properties.

The SDEIS does not note any noise impacts to the Cityscape Apartments at 5707 State Highway 7 or the Townhomes located at 4400 Park Glen Road. Both are within 90-150 feet of the rail line.

2. Contaminated Sites

The map on page 3-190 shows "High-Risk Hazardous and Contaminated Materials" however 17 are noted in the text to be ranked "high" in the Modified Phase I Environmental Site Assessment. Why certain locations were elevated to "high" versus other locations must be explained, along with what the risks are to people in these locations.

3. Maps

- a. Several maps show open space around the Wooddale Station in St. Louis Park inaccurately. The land to the north and south of the station area may be publicly

owned, however it is not park land. Please see attached map and revise accordingly for the following properties:

- Map 3.4-1 on P 3-141
 - Map 3.4-5 on p 3-175
 - Map 3.4-6 on p 3.181
 - Map 3.4-7 on p 3-190
- b. Maps 3.4-9 and 3.4-10 (pages 3-210 and 3-211) do not show the entire buffer area. The concern is that this cuts off Meadowbrook Manor apartments; they should be included in the analysis.

4. Traffic

Roadway improvements noted on page 2-55 do not discuss the additional traffic analysis that has occurred since the DEIS in 2012. Notably, there has been an access modification on Wooddale Avenue that restricts traffic to right-in/right-out at the east frontage road and this should be called out in the document. This restriction impacts the access for the existing and future development in the area, and this impact is significant for area circulation and must be addressed and mitigated. Traffic on Wooddale Avenue in the SWLRT station area is problematic now and with the addition of LRT, this situation will be worsened. The existing residents and future development is seriously impacted by this change to the roadways system.

5. Park & Ride Traffic

The traffic generated by the park & ride facilities at Beltline and Louisiana Stations and the kiss & ride facilities at all three St. Louis Park stations will create congestion, consume local street traffic capacity and create potential safety issues. These impacts need to be clearly identified and effectively mitigated.

6. Bicycle Traffic, Parking and Safety

The Cedar Lake Regional Trail is already heavily used through St. Louis Park. SWLRT will increase the vehicle and bicycle traffic in the station areas in general and increase bicycle – vehicle conflicts where Beltline Blvd and Wooddale Ave cross the regional trail. The SDEIS does not address bicycle parking and safety adequately. No long term direct or indirect bicycle and pedestrian impacts in the St. Louis Park/Minneapolis Segment are identified. St. Louis Park disagrees. We believe there will be negative impacts on the quality of the trail experience in St. Louis Park and safety impacts where the regional trail is crossed by Beltline Blvd and Wooddale Ave. These impacts need to be addressed and mitigated.

The FEIS and final SWLRT design should address these issues in a manner that is consistent with the recommendations in the Southwest Light Rail Transit Bicycle Facility Assessment Technical Memorandum #2, prepared by the Toole Design Group and submitted to stakeholders on May 15, 2015. Safe station area bicycle circulation and bicycle parking is addressed in the Toole Design Group Technical Memorandum.

7. Freight Rail Route Conclusions

While the City of St. Louis Park agrees with the conclusion that incorporating the “Shallow LRT Tunnels – Over Kenilworth Lagoon” into the LPA is the best solution for SWLRT, the rationale for this conclusion is difficult to find in the SDEIS and buried in Appendix F – Development and Evaluation of Design Adjustments Since Publication of the Draft EIS. In addition Appendix F states in a footnote (P. F-71) that, “The *Conclusion* at the end of this section...summarizes the Council’s evaluation of the MN&S North design adjustment.” However there is no subsection titled conclusion and it is difficult to find the explanation for why the last freight rail relocation option under consideration - the modified version of the Brunswick Central design created by TranSystems - was dismissed in favor of the Shallow Tunnel alternative. The freight rail route selection was a difficult and crucial decision in the SWLRT design process. It is important that the conclusion is clear and the document structured in such a way that the conclusion can be found. At a minimum a heading identifying the conclusion in Appendix F should be added to the report. Likewise, for clarity and historical accuracy, the critical fact that the railroads did not support any of the freight rail re-route options, while included in the SDEIS, should be consistently and clearly stated in the document.

From: [Frank Hornstein](#)
To: [swlrt](#)
Subject: SWLRT Comments
Date: Tuesday, July 21, 2015 5:55:04 PM
Attachments: [Hornstein Dibble Met Council Comments SWLRT.pdf](#)

Hello,

Please see the attached document from Representative Hornstein and Senator Dibble regarding their comments on the **Southwest Light Rail Transit (LRT) (METRO Green Line Extension) Supplemental Draft Environmental Impact Statement**. Please let me know if you have any questions or concerns.
Thank you,

Frank Hornstein

Minnesota House of Representatives

100 Rev. Dr. Martin Luther King Jr. Blvd
Saint Paul, Minnesota 55155



Minnesota Senate

75 Rev. Dr. Martin Luther King Jr. Blvd
Saint Paul, Minnesota 55155

July 21, 2015

Adam Duininck
Metropolitan Council
390 Robert St. North
St. Paul, MN 55101-1805

Dear Chair Duininck,

We are writing to express our strong concerns with the sections of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail project that deal with freight rail issues.

Our concerns are rooted in the longstanding decisions by the Metropolitan Council and other jurisdictions to ignore Minn. Stat. Sec. 383B.81, Subd. 6. On a number of occasions, in person and memorialized in correspondence to Metropolitan Council Chair, Sue Haigh, we cited this legal requirement that freight rail be eliminated from this reroute which was always intended to be temporary.

In late 2013, Governor Dayton convened and attended several meetings to discuss Southwest Corridor freight rail issues. The meetings included Metropolitan Council leaders, area legislators, local elected officials, and staff from cities along the alignment. The discussions led to a March 2014 Metropolitan Council report indicating that alternatives to permanent location of freight in the Kennilworth alignment were financially, technically and environmentally feasible.

Following the Council's April 2014 decision to uphold the longstanding intention, despite state law, to make freight routing through the Kenilworth Corridor permanent, the Metropolitan Council indicated that environmental and safety issues posed by that decision would be a key purpose of the SDEIS.

The document lacks an adequate discussion of freight rail issues, particularly safety concerns.

The proximity of homes, businesses, and large condominium and apartment complexes within a few hundred yards of the alignment is one of the unique challenges of permanently transporting ethanol and other hazardous materials through the Kenilworth corridor. The City of Minneapolis estimates that 20,274 residents, 54,576 employees, and 11,148 households live and work in ethanol train disaster evacuation zones along the Southwest Light Rail alignment. The level of community concern, especially among residents who live within proximity of the freight rail tracks, is extremely high.

Over the last eighteen months the state legislature initiated a number of policies and devoted significant resources to address the safety challenges of transporting Bakken crude and ethanol across Minnesota. The resulting examination has identified significant gaps in the state's emergency response to Bakken oil transportation. In 2015 those statutes were amended to add ethanol transportation to state studies and emergency response planning already underway on crude oil transportation.

The legislature took this step because ethanol carries similar safety risks as crude oil transport by rail. The cargo is highly explosive and flammable, and in recent years, like Bakken crude, is transported via unit trains composed of up to 100 cars of ethanol. Unit trains hauling ethanol regularly travel through Kenilworth, constituting 17% of the corridor's rail freight.

According to the Minnesota Department of Public Safety's January 15, 2015 report, Minnesota's Preparedness for an Oil Transportation Incident, "Local governments generally do not have the equipment or personnel to respond to a significant oil transportation incident, such as a large spill or fire (page 11)." In addition, the report stated, "None of the responders rated their area's preparedness as excellent, and "As a whole, first responders surveyed for this study rated their area's preparedness for an oil transportation incident as below moderate 2.6 on a 1 to 5 scale (page 12)."

Given these realities, the SDEIS's contention that the LPA would "generally result in no changes to current operations of freight rail" (3-194) is a significant concern. The document further asserts that "no long term impacts [of freight relocation] are anticipated and therefore no mitigation measures have been identified" (3.4.3.B).

The particular safety challenges of hauling ethanol and other hazardous materials through the corridor during construction of the south shallow tunnel are not adequately addressed.

The SDEIS calls for a "freight rail operations and coordination plan," the purpose for which is to avoid, "short term economic impacts on freight operators and owners during construction" (3-196). It would appear that the Council takes impacts of construction on commerce into account without mention of residents' and business' safety concerns that would need to be addressed during construction. The SDEIS assures the railroad that, "during the time when freight rail tracks are shifted...freight rail operations would not be obstructed, discontinued or slowed (3-204)." The study discusses flagging procedures in which freight trains would be directed through the construction zone and that the costs of this operation would be "borne by the project."

The SDEIS must address serious questions regarding the safety issues posed by freight relocation both during and after construction:

- Has Twin Cities and Western Railroad Company (TC&W) shared specific information with the Minneapolis Fire Department and emergency management personnel regarding the chemical contents of ethanol and hazardous materials transported through the Kenilworth Corridor?
- Has TC&W shared specific information with the Minneapolis Fire Department and emergency management personnel regarding the frequency and size of ethanol and hazardous materials shipments through the Kenilworth corridor?

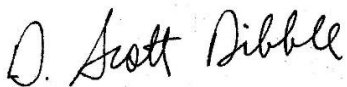
- Has an emergency response plan been developed in consultation with the Minneapolis Fire Department to address potential issues of access to the site during construction in the event of a derailment, explosion, or fire?
- Are there other examples around the country where light rail and freight rail are co-located (including the transportation of hazardous materials in close proximity of light rail trains, businesses, and residences)? If so, what safety and mitigation measures are in place in those communities?
- Are the St. Louis Park and Hopkins fire departments and emergency management personnel involved in discussions regarding co-location of light rail and freight rail in their communities?
- Given the growth of oil and ethanol transportation in the region, and associated safety concerns since co-location was made permanent two years ago, does the Metropolitan Council have any plans to discuss re-routing freight trains carrying ethanol and other hazardous materials away from Hopkins, St. Louis Park, and Minneapolis during and after construction of the Southwest Light Rail project?

Thank you very much for your consideration.

Sincerely,



Frank Hornstein
State Representative, District 61A



D. Scott Dibble
State Senator, District 61

From: [Jacobson, Nani](#)
To: [swlrt](#)
Subject: FW: SWLRT SDEIS EPA letter 07/16/2015
Date: Tuesday, July 21, 2015 5:26:06 PM
Attachments: [EPA-Ltr 07-16-2015 SWLRT-SDEIS.pdf](#)

From: Laszewski, Virginia [mailto:Laszewski.Virginia@epa.gov]
Sent: Thursday, July 16, 2015 5:02 PM
To: Marisol R. Simon (marisol.simon@dot.gov)
Cc: william.wheeler@dot.gov; melissa.m.jenney@usace.army.mil; Jacobson, Nani; Horton, Andrew; Maya.Sarna@dot.gov; lisa.joyal@state.mn.us; kate.drewry@state.mn.us; brooke.haworth@state.mn.us; william.wilde@state.mn.us; catherine.neuschler@state.mn.us; jim.brist@state.mn.us; sara.beimers@mnhs.org; Leslie Stovring (Istovring@edenprairie.org)
Subject: SWLRT SDEIS EPA letter 07/16/2015

Ms. Simon,

Please see attached file for EPA's comment letter dated 07/16/2015 regarding the SDEIS for the Southwest Light Rail Transit project. Signed/dated originals are in the mail.

Thank you,

Virginia Laszewski
Environmental Scientist
US EPA, Region 5
Office of Enforcement and Compliance Assurance (OECA)
NEPA Implementation Section
77 West Jackson, Mail Code E-19J
Chicago, IL 60604
312/886-7501 (voice)
312/679-2097 (fax)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 16 2015

REPLY TO THE ATTENTION OF:

E-19J

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

Mark Fuhrmann
Program Director, Rail New Starts
Metropolitan Council
390 Roberts Street North
St. Paul, Minnesota 55101-1805

Re: Supplemental Draft Environmental Impact Statement – Southwest Green Line Light Rail Transit (LRT) Extension (SWLRT), Hennepin County, Minnesota CEQ # 20150132

Dear Ms. Simon and Mr. Fuhrmann:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Transit Administration's (FTA) May 2015, Supplemental Draft Environmental Impact Statement (SDEIS) for the Metropolitan Council's (Council) Southwest Green Line Light Rail Transit (LRT) Extension (SWLRT) Project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The limited-scope SDEIS evaluates the environmental effects associated with adjustments the Council made to the locally preferred alternative (LPA) since the 2012 Draft EIS (DEIS). It updates the DEIS to reflect the design adjustments to the LPA in two specific geographic areas: 1) the Eden Prairie Segment and 2) the St. Louis Park/Minneapolis Segment, and the identification of the location of a proposed Operation and Maintenance Facility (OMF) in Hopkins. The SDEIS includes a description of the process and analyses used to identify adjustments to the LPA for those three topics and includes additional preliminary Section 4(F) *de minimis* impact findings not included in the DEIS.

EPA reviewed the 2012 DEIS and provided comments to FTA on December 27, 2012. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (See attached "Summary of EPA Rating Definitions and Follow-Up Actions"). Our comments and primary recommendations were to clarify the project purpose and need, and adequately analyze

alternative impacts related to the OMF, aquatic resources, water quality, neighborhoods with environmental justice concerns, air quality, and noise. We also recommended undertaking an evaluation of a possible modification to DEIS Alternative LRT-3 to avoid impacts to a major wetland area. Since the SDEIS is limited in scope, the SDEIS discloses that substantive comments FTA received during the DEIS public comment period will be addressed in the Final EIS (FEIS) and not this SDEIS (page ES-24).

Based on our review of the SDEIS, EPA rates the SDEIS as Environmental Concerns – Insufficient Information (EC-2). EPA’s detailed comments on the DEIS still apply and we remain particularly concerned with potential impacts to aquatic resources, water quality and associated mitigation. See the enclosure for EPA’s detailed comments regarding the SDEIS.

According to the SDEIS (page i), FTA will issue a single FEIS and Record of Decision (ROD) document. EPA recommends FTA convene a meeting of cooperating and participating resources agencies to present and discuss FTA’s proposed draft written responses to SDEIS and DEIS comments prior to FTA issuing the combined FEIS/Record of Decision (ROD). This will allow the resources agencies opportunity to react to the proposed responses to the agencies’ SDEIS and DEIS comments, and for revisions to be made (if appropriate) prior to release of the FEIS/ROD.

Virginia Laszewski of my staff is EPA’s lead NEPA reviewer for this project. She may be reached by calling 312/886-7501 or by email at laszewski.virginia@epa.gov. EPA requests at least a two-week advance notice prior to our receipt of project materials for review and/or prior to project meetings/conference calls. We also request one hard copy and 3 DVDs of the FEIS/ROD, when it is available.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosures (2): 1) EPA Comments - FTA SWLRT SDEIS, and 2) “Summary of Rating Definitions and Follow-Up Actions.”

Cc (email):

Nani Jacobson, Assistant Director, Environmental and Agreements, Metro Transit,
Southwest LRT Project, Nani.Jacobson@metrotransit.org.

Melissa Jenny, USACE-St Paul, Melissa.m.jenny@usace.army.mil

Andrew Horton, USFWS-Twin Cities Field Office, Andrew_Horton@fws.gov

Maya Sarna, FTA, HQ, Maya.Sarna@dot.gov

Bill Wheeler, FTA-Chicago, william.wheeler@dot.gov

Lisa Joyal, MnDNR, lisa.joyal@state.mn.us

Kate Drewry, MnDNR, kate.drewry@state.mn.us

Brooke Haworth, MnDNR, brooke.haworth@state.mn.us

Bill Wilde, MPCA, william.wilde@state.mn.us

Catherine Neuschler, MPCA, Catherine.neuschler@state.mn.us

Jim Brist, MPCA, jim.brist@state.mn.us

Sarah Beimers, Minnesota State Historic Preservation Office, sarah.beimers@mnhs.org

Leslie Stovring, City of Eden Prairie, lstovring@edenprairie.org

**EPA Comments - Federal Transit Administration (FTA) May 2015 Supplemental Draft
Environmental Impact Statement (SDEIS) – Southwest Green Line LRT Extension,
Hennepin County, Minnesota
(CEQ # 20150132)**

BACKGROUND

The Federal Transit Administration's (FTA) 2012 Draft Environmental Impact Statement (DEIS) presented the transportation and environmental impacts associated with the construction and operation of an approximately 16-mile Southwest Light Rail Transit (LRT) (METRO Green Line Extension) project as an extension of the METRO Green Line (Central Corridor LRT). The Southwest LRT (SWLRT) would operate from downtown Minneapolis through the communities of St. Louis Park, Hopkins, Minnetonka, and Eden Prairie, passing in close proximity to Edina. The DEIS identified a Locally Preferred Alternative (LPA). The DEIS LPA encompassed DEIS Alternative 3A (relocate freight line) and Alternative 3A-1 (co-locate SWLRT along existing freight line corridor). Since the 2012 DEIS, the Metropolitan Council (Council) has made design adjustments and modifications to the LPA.

The limited-scope Supplemental DEIS (SDEIS) updates the DEIS to identify and evaluate the environmental effects to reflect the Council's revised LPA adjustments in three specific areas:

1. Eden Prairie Segment

Adjustments were made to the light rail alignment, stations, and park-and-ride lots in the Eden Prairie Segment with related bus, roadway, and bicycle/pedestrian improvements. This includes but is not limited to:

- The western terminus station (Mitchell Station) would be located on the south side of Technology Drive, west of Mitchell Road, instead of immediately south of highway 212 as identified in the DEIS.

2. Location of the Operation and Maintenance Facility

- A 15-acres site in Hopkins is proposed for the OMF (Hopkins OMF 9A). The Hopkins OMF site would be located 1,000 feet south of the proposed Shady Oak Station within an existing office/warehouse and light manufacturing development. The Hopkins site was not evaluated in the 2012 DEIS.

3. St. Louis Park/Minneapolis Segment

Adjustments were made to the light rail alignment, stations, and park-and-ride lots within the St. Louis Park/Minneapolis Segment with related bus, roadway and bicycle/pedestrian improvements, and freight rail modifications. This includes but is not limited to:

- Co-location of the light rail in this segment, retaining existing Twin Cities and Western (TC&W) freight rail service in the Kenilworth Corridor, with some modification to freight rail tracks to accommodate the light rail.
- Placement of the proposed light rail alignment in a shallow tunnel in the Kenilworth

Corridor generally between West Lake Street and the Kenilworth Lagoon (a constructed waterway that connects Lake of the Isles and Cedar Lake). The light rail alignment would rise back to grade to cross the lagoon on a new bridge and would continue at-grade throughout the remaining eastern portion of the Kenilworth Corridor.

WETLANDS

- USACE correspondence dated October 16, 2014 (SDEIS Appendix E) indicates that impacts to Waters of the United States associated with the LPA have risen from approximately 8.7 acres, identified as of April 2014, to approximately 18.5 acres, as a result of wetland delineations and further project development. Thoughtful project design and consideration of staging areas and access will likely allow for smaller permanent wetland impacts or fewer temporary wetland impacts.

Recommendations: EPA hereby reiterates our comments on avoiding and minimizing wetland impacts, as discussed in our DEIS comment letter dated December 27, 2012. Additionally, many of the wetland impacts appear to be due to installation of pedestrian/sidewalk areas (as shown in Appendix G Conceptual Engineering Drawings). FTA and MnDOT should determine if alternatives to fill, such as elevated pedestrian boardwalks, are feasible to be used in delineated wetland areas. Reduction of fill by use of elevated boardwalks or, removal or relocation of proposed sidewalks in wetland areas, could or will significantly reduce impacts and related wetland mitigation requirements under Section 404 Clean Water Act Section 404 permitting requirements. Alternatives to fill, particularly in these areas, should be discussed in the FEIS.

- A number of Traction Power Substations (TPSSs) will be required to supply electrical power to the traction networks and passenger rail stations. They will need to be sited at approximately one-mile intervals along the final route. Page 3-46 of the SDEIS states, *“In addition to the light rail related improvements described above, the LPA will also include TPSS facilities. The specific locations for TPSSs have not been defined; however, siting of these facilities will be determined by utilizing fully developed areas, including surface parking lots, existing roadway right-of-way, and vacant parcels where feasible.”* However, specific (though general) overall locations of TPSS facilities were shown in Appendix G Conceptual Engineering Drawings. The SDEIS does not analyze or discuss detailed potential wetland impacts associated with these TPSS locations, nor are such impacts reflected in the wetland impact figures (Exhibit 3.2-5; Exhibit 3.3-2; and Exhibit 3.4-5).

Recommendation: Review of Appendix G drawings shows potential wetland impacts due to siting of TPSS stations. TPSS stations should be sited in upland (non-wetland) locations. As there is some flexibility in siting of TPSS stations, thoughtful design and planning may further reduce wetland impacts. Examples include, but are not limited to:

- TPSS SW-21 (Eden Prairie Segment) includes a circled area on the north side of Technology Drive, which appears to be wetland. This area does not appear to have been included as a delineated wetland but may be in the vicinity of Wetland EP-02. Approximate location: 44.857997, -93.464456.

- TPSS SW-20 (Eden Prairie Segment) includes a circled area on the north side of Technology Drive, which appears to be wetland. This may have been delineated as the wetland north of Wetland EP-12. Approximate location: 44.858280, -93.456599.
- The SDEIS stated that the Hopkins Operations & Maintenance Facility (OMF) has been selected as the LPA. The Hopkins OMF currently has mixed industrial land uses, though construction would require approximately a total of 0.68 acre of wetland fill (three separate fill locations) to Wetland NM-HOP-13, a 2.67-acre wetland.

Recommendation: While EPA commends the use of an existing industrial site for the OMF, wetland impacts may be able to be further minimized during final site design. EPA recommends that further wetland impact minimization at this location be investigated.

- The SDEIS clarifies that the LPA, LRT 3A-1, involves freight co-location¹ instead of freight rail relocation in the St. Louis Park/Minneapolis Segment. Wetland impacts associated with the St. Louis Park/Minneapolis Segment are estimated to be approximately 0.5 acres. The SDEIS was not clear as to whether or not this 0.5 acre impact estimate includes wetland impacts associated with the 45-foot relocation of the freight rail. Specifically, the SDEIS was unclear if the areas to which the freight rail will be moved have been delineated, and if wetland impacts associated with that relocation of the freight rail have been included in wetland impact totals. Additionally, the SDEIS was unclear if the areas to which the Cedar Lake LRT trail will be moved have been delineated, and if wetland impacts associated with that trail relocation have been included in wetland impact totals.

Recommendation: In the FEIS, please provide clarification on whether or not the new freight rail and trail corridors have been delineated. If not, a delineation should be performed and any additional wetland impacts added to impact summary tables. Updated information should be provided in the FEIS.

STORMWATER AND CONSTRUCTION STAGING

- Page 3-65 of the SDEIS states, “*The project would construct additional stormwater facilities as needed, and construction would be coordinated with the local jurisdictions to connect the new facilities to existing stormwater management facilities.*” There was no discussion of implementation of permanent best management practices (BMPs), to include detention and infiltration facilities to control and treat stormwater runoff caused by an increase in impervious surfaces as a result of project implementation. The SDEIS did not discuss any green BMPs to control stormwater, including the use of pervious pavement at park and ride

¹ Design adjustments to 3A-1 would generally place the proposed light rail alignment and stations within the current freight rail right-of-way, and the freight rail alignment would be moved approximately 45 feet north onto right-of-way currently owned by the Hennepin County Regional Railroad Authority (HCRRA) (purchased as future light rail right-of-way and where light rail would have been under the conceptual design of LRT 3A and LRT 3A-1 within Draft EIS). In addition, the Cedar Lake LRT Trail, which is a permitted temporary use within the HCRRA-owned right-of-way north of the existing freight rail alignment, would be reconstructed further north within that same right-of-way, staying north of the repositioned freight rail alignment.

areas. Most importantly, the SDEIS did not confirm that stormwater detention basins will not be built in any wetland areas.

Recommendations: All stormwater BMPs and detention areas should be built and located outside of natural wetlands and streams. Existing natural wetlands should not be used as primary detention facilities, and any treated stormwater discharged to natural wetlands should not cause a change of existing use of the wetland (e.g., should not change an emergent wetland to an open water wetland, etc.) Green stormwater technologies, including the use of pervious or porous pavement, should be utilized throughout the project where feasible. The FEIS should include figures and project plans detailing stormwater basin locations, and ensure that no stormwater/sediment/erosion control measures are proposed to be constructed in wetlands or other Waters of the U.S. This should be clearly stated and supported in all figures provided with the Final EIS.

- The SDEIS did not discuss any construction access or staging areas that may be required to implement the LPA.

Recommendations: The FEIS should include proposed construction measures, including a discussion of staging areas and their locations, access to the worksite(s), and detailed discussion on any proposed in-stream construction. EPA recommends that equipment not work actively from within any stream, and that dewatering measures such as temporary portable dams or cofferdams be installed to isolate stream flow from any active work areas. Temporary impacts to wetlands and other Waters of the U.S. should be first avoided, then minimized. Any unavoidable temporary impacts to wetlands and other Waters of the U.S. should be included in the calculation of impacts and mitigation.

WELL HEAD PROTECTION - DRINKING WATER SUPPLY

The SDEIS (page 3-59) states: *“The west end of the Eden Prairie Segment, including the area around the Mitchell Station, is located within the Wellhead Protection Area, and the remainder of the segment is located in the Drinking Water Supply Management Area. In advance of construction, the Council will coordinate with the City of Eden Prairie to insure that the construction and operation of the LPA meets the provisions of the Wellhead Protection Plan (WHPP).”*

Recommendation: We recommend the FEIS disclose how construction and operation of the LPA could meet the provisions of the WHPP.

ACRONYMS AND ABBREVIATIONS

Recommendation: Include TPSS (Traction Power Substation) in *Acronyms and Abbreviations* (pages xvii – xix).

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

From: [Jacobson, Nani](#)
To: [swlrt](#)
Subject: FW: Comments- Southwest Light Rail Transit (Metro Green Line Extension), Hennepin County, Minnesota
Date: Wednesday, July 22, 2015 5:07:07 PM
Attachments: [er15-311.pdf](#)

SDEIS comment.

From: Mathis, Gregory (DOT) [<mailto:greg.mathis@state.mn.us>]
Sent: Wednesday, July 22, 2015 3:09 PM
To: Jacobson, Nani; Leon Skiles
Cc: Campbell, Kelcie
Subject: FW: Comments- Southwest Light Rail Transit (Metro Green Line Extension), Hennepin County, Minnesota

Nani and Leon – FYI

Greg Mathis
Cultural Resources Unit
Office of Environmental Stewardship
Minnesota Department of Transportation
395 John Ireland Boulevard, Mail Stop 620
St. Paul, MN 55155
Office: 651-366-4292 / Fax: 651-366-3603
greg.mathis@state.mn.us

From: Sarah Beimers [<mailto:sarah.beimers@mnhs.org>]
Sent: Wednesday, July 22, 2015 11:20 AM
To: Mathis, Gregory (DOT)
Subject: Fwd: Comments- Southwest Light Rail Transit (Metro Green Line Extension), Hennepin County, Minnesota

FYI

Sarah Beimers
Manager of Government Programs & Compliance | Minnesota Historic Preservation Office
Heritage Preservation Department | Minnesota Historical Society | 345 Kellogg Boulevard West | St. Paul MN 55102
tel: 651-259-3456 | e: sarah.beimers@mnhs.org

----- Forwarded message -----

From: **Barbara Howard** <barbara.howard@mnhs.org>
Date: Sat, Jul 18, 2015 at 6:59 AM
Subject: Fwd: Comments- Southwest Light Rail Transit (Metro Green Line Extension), Hennepin County, Minnesota
To: Kelly <kelly.graggjohnson@mnhs.org>, Sarah Beimers <sarah.beimers@mnhs.org>

Sent from my iPad.

Begin forwarded message:

From: "Darby, Valincia" <valincia_darby@ios.doi.gov>
Date: July 17, 2015 at 10:56:21 AM CDT
To: <Marisol.simon@fta.dot.gov>
Cc: <barbara.howard@mnhs.org>, <commissioner.mclaughlin@hennepin.us>
Subject: **Comments- Southwest Light Rail Transit (Metro Green Line Extension), Hennepin County, Minnesota**

Ms. Simon,

The U.S. Department of the Interior offers the following comments on the subject project. If there are questions, please contact this office at [\(215\) 597-5378](tel:(215)597-5378).

Best Regards,

Valincia

--

Valincia Darby

Regional Environmental Protection Assistant

Department of the Interior, OEPC

200 Chestnut Street, Rm. 244

Philadelphia, PA 19106

Phone: [\(215\) 597-5378](tel:(215)597-5378) Fax: [\(215\) 597-9845](tel:(215)597-9845)

Valincia_Darby@ios.doi.gov



IN REPLY REFER TO:

United States Department of the Interior

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

July 17, 2015

9043.1
ER 15/0311

Ms. Marisol Simon
Regional Administrator, Region 5
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, Illinois 60606

Dear Ms. Simon:

As requested, the Department of the Interior (Department) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) and Section 4(f) Evaluation for the Southwest Light Rail Transit (Metro Green Line Extension), Hennepin County, Minnesota. The Department offers the following comments and recommendations for your consideration.

Section 4(f) Comments

This document considers effects to properties identified in the project study area as eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303 § 771.135) associated with a 15-mile light rail transit (LRT) line in the Minneapolis/St. Paul region, the proposed Southwest Transitway (Project). 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 Project that connects downtown Minneapolis to the cities of St. Louis Park, Hopkins, Edina, Minnetonka, and Eden Prairie. The intent of the Project 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 Project was identified by the RTB in the late 1990's as warranting a high-level of transit investment to respond to increasing travel demand in a highly congested area of the region. A draft environmental impact statement (EIS) for the Project was released in the late fall of 2012 and the Department provided comments on the Section 4(f) impacts. We felt at that time the analysis in the Section 4(f) was too preliminary to be able to concur in any findings.

In 2013 and 2014, the FTA determined that design adjustments made to the preferred alternative that was identified in the Draft EIS needed to be evaluated for environmental impacts not documented in the Draft EIS and with the potential to result in new adverse impacts. The FTA, with the RTB, further determined those design changes in the preferred alternative warranted a specific review in a supplemental draft EIS document.

In the SDEIS, the FTA considered the impacts to several 4(f)-eligible resources; 12 were parks or recreation areas and 28 were historic properties either individually eligible for or listed on the National Register of Historic Places (NRHP), or were contributing elements to historic districts. A few properties were eligible both as park/recreation and historic properties. After considering the changes to the preferred alternative and its impacts on these resources, the FTA has made preliminary determinations that of the 12 park properties, 1 property (Purgatory Creek Park) would be affected only temporarily by construction (no permanent use), and 3 properties (Kenilworth Channel/Lagoon, Cedar Lake Park, and Byrn Mawr Meadows Park) would have *de minimis* impacts; the rest of the eligible park properties would have no 4(f) use. Of the 28 eligible historic properties, the FTA made preliminary determinations that the Project would have adverse effects on two properties (the Grand Rounds Historic District and Kenilworth Lagoon), and a *de minimis* effect on one property (the St. Paul, Minneapolis & Manitoba Railroad Historic District). In addition, two properties (the Minikahda Club and Cedar Lake Parkway/Grand Rounds Historic District) would be temporarily affected by construction activities, but no permanent use would occur.

The FTA will allow the public to comment on the SDEIS and this 4(f) evaluation before finalizing their determinations. For now, the FTA has concluded at least preliminarily that there are no feasible or prudent avoidance alternatives, other than the preferred alternative, that results in disturbances to 4(f) eligible properties. The Department concurs with the preliminary determinations of effect by the FTA, assuming that there are no subsequent changes to the preferred alternative or in the impacts to the eligible properties. We have no authority to agree to the determinations of *de minimis* impacts, but we would state that those determinations appear to have been decided correctly. The Department would likely concur with the preliminary determination that all measures to minimize harm have been employed concerning the two historic resources that will be subject to 4(f) use. This concurrence assumes the FTA and the State Historic Preservation Officer, along with the Section 106 consulting parties, come to some agreement on the mitigation necessary for the two resources, and an agreement document is signed by all parties. We will reserve our concurrence until we are provided a copy of the signed agreement.

The Department has a continuing interest in working with the FTA and the RTB to ensure impacts to resources of concern to the Department are adequately addressed. For issues concerning section 4(f) resources, please contact Regional Environmental Coordinator Nick Chevance, Midwest Region, 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". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lindy Nelson
Regional Environmental Officer

cc:

SHPO-MN (Barbara Howard barbara.howard@mnhs.org)

HCRRRA (Peter McLaughlin commissioner.mclaughlin@hennepin.us)