

# **Section 5:**

## **Comments on SDEIS**

# **General Public Comments**

improving  
mobilityEasing  
congestionStrengthening  
our communities

# Central Corridor Light Rail Transit

Supplemental  
DEIS Comment Sheet

Name: GEORGE ULRICH BOALIK Email:

Address: 3142 4<sup>th</sup> St SE, MRS MN 55414

Please take a moment to share your comments on the Central Corridor Light Rail Transit project in the space provided below. Your comments will be transcribed in the public hearing record and responded to in the Final Environmental Impact Statement. Thank you for taking the time to share your views on this important transit project.

At a public hearing I expressed my unhappiness at the proposed fare increase. I now express my doubts about the proposed corridor along University Avenue. Cannot St. Paul and Minneapolis be Light Rail along the 94 Freeway. Too many bus lines are in danger of closing if the Corridor is along the University.

I hope that no bus line will be discontinued (except the #50). Those on assisted living depend on busses for shopping.

To submit your comments electronically, please visit the website at [www.centralcorridor.org](http://www.centralcorridor.org) and click on SDEIS under "hot topics".

To send your comments via U.S. mail, please print this document and mail to:

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104

The final date to receive comments is August 25, 2008

Rec'd  
8/25/08  
RC

David Rasmussen  
409 Roy Street North  
Saint Paul, MN 55104  
August 24, 2008

Ms. Kathryn L. O'Brien, AICP  
Project Manager, Central Corridor Project Office  
540 Fairview Ave. North, Suite 200S,  
Saint Paul, MN 55104

Dear Ms. O'Brien,

Attached are 1000 signatures in support of the following statement:

**We support a 1000 slot park and ride at the bus barn site and under Midway Center (Snelling Avenue and Saint Anthony Blvd./Snelling Avenue and University Avenue) to serve State Fair goers, the I94 bus route, the 84 bus route, the 21/53 bus route, the 16/50 bus route, the 144 bus route, the future Central Corridor rail, a future Snelling Avenue rail line, and small businesses and local residents who lose parking with construction of the rail. This park and ride should serve parkers and those transferring between buses with safe pedestrian and bicycle access under the very busy streets of Snelling Avenue and University Avenue, as Snelling Avenue in this neighborhood has the highest traffic accident rate in the state. Ideally, the park and ride will exit under Snelling Avenue, directly to I-94 ramps to avoid further traffic congestion on Snelling Avenue. The park and ride does not preclude development of the bus barn site and the neighboring lot, because the park and ride can be relocated below ground.**

In my neighborhood, adjacent to the proposed station at Snelling and University, 100% of the twenty people I spoke with today support the resolution, and signed the petition.

Thank you for accepting this petition into the SDEIS for the Central Corridor project.

  
David Rasmussen

**See Appendix 2 for the following Comment Attachments: Signatures on petition for a park and ride at Midway Center bus depot**

Improving  
mobilityEasing  
congestionStrengthening  
our communities

# Central Corridor Light Rail Transit

Supplemental  
DEIS Comment Sheet

Name:

Joel Clemmer

Email:

joel@joelclemmer.org

Address:

2154 Fairmount Avenue Saint Paul MN 55105

Please take a moment to share your comments on the Central Corridor Light Rail Transit project in the space provided below. Your comments will be transcribed in the public hearing record and responded to in the Final Environmental Impact Statement. Thank you for taking the time to share your views on this important transit project.

The communities along the planned route along University Avenue in Saint Paul are disadvantaged communities and disproportionately dependent on transit. Transit investment should improve, not diminish their options and quality of service. We have a problem ultimately stemming from the decision to place stations one mile apart and not service on the #16 bus.

- Stations are too far apart by standards of other cities
- The so-called "infill" stations should be top priority
- Rather than mitigating that deficiency we make it worse by cutting parallel bus service.

To submit your comments electronically, please visit the website at [www.centralcorridor.org](http://www.centralcorridor.org) and click on SDEIS under "hot topics".

To send your comments via U.S. mail, please print this document and mail to:

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104

Received

AUG 8 2008

CCPO/Met Council

The final date to receive comments is August 25, 2008

# Central Corridor Light Rail Transit

## Supplemental DEIS Comment Sheet

Strengthening  
our communities

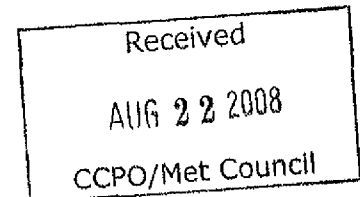
**Name:** Scott Daby

**Email:** scott\_daby@yahoo.com

**Address:** 3146 Pierce Street NE Minneapolis, MN 55418

Please take a moment to share your comments on the Central Corridor Light Rail Transit project in the space provided below. Your comments will be transcribed in the public hearing record and responded to in the Final Environmental Impact Statement. Thank you for taking the time to share your views on this important transit project.

It is short-sighted to run the proposed line at grade through Washington Avenue. Although a tunnel would cost more, it should be considered an investment in Minnesota's transportation infrastructure. Traffic congestion is heavy on this street and rerouting cars off of Washington Avenue will be next to impossible. If the University of Minnesota is to remain accessible to students and those who work there, a tunnel option is clearly a better option.



To send your comments electronically, please click Send.

**Send**

To send your comments via U.S. mail, please print this document and mail to:

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104

**The final date to receive comments is August 25, 2008**

Leslie Davis  
Earth Protector, Inc.  
P.O. Box 11688  
Minneapolis, MN 55411  
612/522-9433

August 25, 2008

**SENT BY E-MAIL, HARD COPY WILL BE MAILED**

Metropolitan Council  
c/o Kathryn O'Brien  
Central Corridor LRT Project Office  
540 Fairview Avenue North, Suite 200  
St. Paul, MN 55104

Re: Comments on proposed Central Corridor light rail line and the Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Kathryn O'Brien,

These are the comments of Leslie Davis and the Earth Protector environmental group for a proposed light rail line from downtown St. Paul to downtown Minneapolis, with specific attention to a recently published incomplete Supplemental Draft Environmental Impact Statement (SDEIS) for a specifically selected corridor generally along University Avenue in St. Paul, to connect to the current Hiawatha rail line in Minneapolis, thus sharing certain tracks.

Several years ago we commented on a central corridor rail line and suggested that the area near and along the Pierce Butler Road, where rail lines and a rail corridor already exist and development would be virtually unlimited, would be a more appropriate place for such transportation...if such transportation is even needed. By reference to those comments we incorporate these comments.

We considered making more extensive comments after carefully reviewing the misleading SDEIS documents for the Central Corridor project, but we feel that this project is so ill-conceived that it will likely not get the wished for federal funding, and we can better spend our time elsewhere.

Buses (94, 50, and 16) run beautifully along the proposed corridor mentioned for change in the SDEIS. The placement of light rail transit (LRT) is simply for the personal financial interest of various politicians, government appointees, government employees, private contractors, consultants, and their various operatives. There is no reason to put LRT in a Central Corridor along University Avenue unless it is to line the pockets of those mentioned above.

We would like to tie off the comments I heard at one Central Corridor meeting at which a person testified that it would take much more than 50% longer to go from one end of the proposed Central Corridor line to the other end than the project proposers are claiming.

We are concerned about several items at this time that are not addressed in the environmental review of the proposed project. They are:

1. The security factor. Having a million people in the Twin Cities area linked to rail lines that can be taken out of commission by sabotage has not been addressed and must be.



2. With more electricity being used in people's lives, and soon to include electric cars, it is important to analyze and report on the effects that the stray and stationary electricity voltage will have on people who ride and work in and around the LRT system.

Furthermore, the combined debt of various Minnesota entities, city, county, township, exceeds \$30 billion and a likely multi-billion dollar shortage for operations of the state in the next biennium. Adding more debt with a rail line as proposed is irresponsible. Whether the money for the proposed Central Corridor LRT project comes from the state or the federal government, it is money created from debt and **THAT MUST STOP**. Creating more money as debt, according to the U.S. Constitution, could be considered by many to be treasonous.

With the United States government trillions of dollars in debt, we would like an explanation of where the Federal Transit Administration will obtain hundreds of millions of dollars to send to Minnesota to pay for this project.

Sincerely,

Leslie Davis

---

Greetings; I have made an extensive review of the SDEIS and I have many major concerns that I did not have time to properly address. I am very concerned about the outdated statistics and projections that were made in the SDEIS and the DEIS.. I thank you very much for carefully reviewing the information and making the appropriate decisions bases upon the facts and in the best interests of all taxpayers and transit users.

Scott Halstead

---

□ Û

August 24, 2008

Metropolitan Council  
C/O Central Corridor LRT Project Office  
540 Fairview Avenue N., Ste. 200  
St. Paul, MN 55140  
Attn.: Kathryn O'Brien

Dear Ms. O'brian;

The following letter and attachment are my comments about the Central Corridor Supplementary Draft Environmental Impact Statement. Please forward these comments to the Metropolitan Council.

I have made extensive research and analysis of employment, demographics, growth and housing in the central cities, developed suburbs, and developing suburbs. I reviewed bus performance and transit projections, compiled and calculated the bus performance times for the bus schedules utilized on the DEIS and the current schedules. I have reviewed capital costs, operating and maintenance costs and safety records for various types LRT systems. I have talked to staff members at the Minnesota Dept. of Land Admen., Land Management Information Center, Metropolitan Council research staff, Metropolitan Transit planners and other Government Officials.

The Metropolitan Council/Central Corridor LRT supplemental environmental impact statement (SDEIS) contains many projections and estimates that are not based upon proper data. Many of the projections are based upon data that is 5 - 8 years old. The Metropolitan Council has issued several recent reports on metro area employment and the communities populations, but that information was not utilized to prepare the projections. Why? The population, new housing and employment projections are particularly concerning.

The SDEIS projections don't reflect the large number U.S., Minnesota and local problems's. Minnesota's unemployment is at its highest in 25 years and worse than the national average. Family sizes are declining and the population is getting much older. The rates of crime in St. Paul and Minneapolis are unacceptably high. Home

foreclosures have increased rapidly, home values have declined, 22% of homes on the market are lender mediated (stressed home owners are selling to prevent foreclosure) and mortgage qualifications have been raised. Many high paying jobs have been relocated to lower labor cost locations. Companies, governments and non-profit organizations are reducing staffs, companies are closing plants, offices, service and retail facilities and many are going out of business entirely. The U.S. inflation rate is the highest in 17 years, the rate of earnings declined nationally by more than 3% this past year, discretionary spending is severely limited and energy costs are rising rapidly. The vacant and foreclosed homes will result in reduced property tax receipts. As earnings decline, unemployment increases, the stock market declines and income tax receipts will decline. As vehicle purchases decline, motor vehicle tax receipts will decline which directly reduces the tax subsidy for transit. Sales tax receipts will decline dramatically. The rate of bankruptcies has increased dramatically. Minnesota's economy is in decline. The projected growth in population, employment, and housing for 2010 won't be met and the differences are large and that will carry forward to future projections utilized in the SDEIS.

In analyzing the bus performance times on the 2001/2002 bus schedules utilized in the draft environmental impact statement, (deis) I found out that performance times stated were higher than the applicable schedules that were in effect when the draft environmental impact statement was prepared and are higher than they are on the current bus schedules. The actual bus transit times were incorrect on draft environmental impact statement which translates into an inaccurate cost effectiveness index calculation. The Federal Transit Administration may never have funded this project if the correct times were utilized.

The Central Corridor LRT is going to burden each of Minnesota's current 2.3 million approximately \$40.00 annually for operating and maintenance cost of the Central Corridor LRT in 2030. The Central Corridor is a vital location for mass transit. The route, design, lack of congestion relief on I-94, capital cost, operating and maintenance cost, insignificant additional passenger revenue and large taxpayer subsidies are the problems. It is

very apparent that the metropolitan Council did not conduct any realistic total cost and revenue analysis for this project. It fails to address the lost time by passengers, commuters, fuel wasted, safety, congestion relief, and future extension and expansion. The Metro area lacks a long term transit strategy, proper governance, big picture leadership and adequate funding. The Environmental Impact Statements reflect Metropolitan Council and Project/Community Leaders desires rather than good sound use of statistics and business practices to build a cost effective transit system.

If you have any questions or wish to discuss the information further, please call me at 651/486-9861 or contact me via e-mail at [snhalstead@gmail.com](mailto:snhalstead@gmail.com)

Sincerely,

Scott W Halstead

#### ATTACHMENT

##### Chapter 1, 1.3.1 Demographics

###### Population of St. Paul

Organization 1990 2000 2006 2007 2010 2020 2030  
 Metropolitan Council Forecasts Revised Jan. 9, 2008 286,840 305,000 320,000 331,000  
 U.S. Census Bureau 287,151 272,217  
 City of St. Paul 287,151 273,535  
 State of Minnesota 272,235 286,840 286,620  
 Metropolitan Council Twin Cities Region, Population Estimate 4/1/07 286,620 287,669

###### Population of Minneapolis

Organization 1990 2000 2006 2007 2010 2020 2030  
 Metropolitan Council Forecasts Revised Jan. 9, 2008 382,747 402,000 423,000 435,000  
 U.S. Census 368,383 382,618  
 State of Minnesota 388,020  
 Metropolitan Council Twin Cities Region, Population Estimate 388,020

I reviewed the U.S. Census Bureau, State of Minnesota and Metropolitan Councils estimates/forecasts for St. Paul, Minneapolis and the major inner city suburbs. Through 2007, St. Paul, Minneapolis and many of the Twin Cities developed suburbs lost population from 2000 - 2007. According to the local newspapers, several housin

g development projects in downtown St. Paul have been cancelled and there is a significant number of vacant homes caused by the housing finance problems. New housing starts have dropped significantly. The developing suburbs are gaining population. The Minnesota Demographic Center projects that the Ramsey county population is going to decline through 2035 and Hennepin County will increase less than 10%. The Minnesota working age population (25 -64) is going to increase approximately 290,812 (10.4%) through 2035. The ages 65+ population is increasing 776,719 (125%). It is very unlikely that St. Paul's population will be near the Metropolitan Councils revised forecast dated January 9, 2008. The Metropolitan Council's most recent population forecasts for St. Paul's population to increase 44,160 from 2000 to 2030 is not based upon the period 2000 - 2007 actual data, current conditions and Minnesota demographic forecasts.

The Metropolitan Council 2030 plan forecasts a 37% increase in population for the metro area. According to various Metropolitan Council documents, the vast majority of growth is in the developing suburbs. The population projections from SDEIS the Metropolitan Council Table 1-2 for the Central Corridor are unrealistic and will not be achieved in the time frame.

### Employment

Metropolitan Council Publication 74-08-022 dated July 2008 reports the employment in the Twin Cities Region, 2000-2007 through the second quarter of 2007. The central cities of Minneapolis and St. Paul lost 21,300 jobs (-4.3%) compared to 2000. Metropolitan Council Table 1-4 projects a growth of 15,650 jobs in the central corridor study area compared to a 21,303 loss in jobs in the central cities by the year 2010. The Central cities is larger than the Central Corridor study area. As of the year 2000, the Central Corridor provided 64% of the Central Cities jobs. With the 2008 national, state and local economy even worse than 2007 and not anticipated to improve significantly for sometime, the 2010 employment projections for the Central Corridor will probably be 25,000 - 40,000 short.

Place - Employment in 2000 - Employment in 2007 - Chan

ge % change % of Metro area jobs □ □ Minneapolis □ 308,127 □ 293,485 □ -14,642 □ -4.8% □ 18% □ □ St. Paul □ 188,124 □ 181,463 □ -6,661 □ -3.5% □ 11.% □ □ Developed Suburbs □ 709,258 □ 690,781 □ -18,477 □ -2.6% □ 43.2% □ □ Developing Suburbs □ 374,295 □ 432,898 □ +58,603 □ 15.7% □ 26.5% □ □ Minnesota and the central cities is trailing other U.S. Metropolitan economies and still faces the pending closure of a Ford motor plant and Northwest Airlines merger with Delta airlines. Most of the Metro area job growth is in the developing suburbs. St. Paul's job growth has been in education, health services, leisure and hospitality and financial services. In the Twin Cities, there has been a large reduction in good paying manufacturing, trade, transportation, utilities and information jobs. Reduction in the quantity, quality of jobs and unemployment are major problems, but the area is also negatively affected by the loss of high quality jobs which are replaced with service industry jobs at lower pay and frequently without essential employee benefits.

## Housing

Residential building Permits □ Source: Metropolitan Council, Data from 1990 and 2000 U. S. Census

### Community

□ Permits 1970's □ Permits 1980's □ Permits 1990's □ Permits 2000 □ Permits 2001 □ Demolitions 1990 - 2001 □ Permits/Demolitions

1990 - 2001 □ □ St. Paul □ 11,312 □ 6,720 □ 1,026 □ 360 □ 703 □ 1,322 □ +767 □ □ Minneapolis □ 12,634 □ 7,642 □ 3,735 □ 536 □ 1,176 □ 5,171 □ +1,276 □ □

The 1990 - 2001 period resulted in a little over 2000 additional housing units in St. Paul and Minneapolis. I was not able to find current permit data for St. Paul and Minneapolis or LRT transit corridors. How many Minneapolis housing units were demolished for the Hiawatha LRT right of way? Have they been replaced?

Residential Building Permits □ Source: U. S. Census Housing units □ Building Permits for Metropolitan area 1/1- 1/6/08 □ 2007 □ 2006 □ 2005 □ 2004 □ 2003 □ 2002 □ 2001 □ □ 2,568 □ 9877 □ 15,614 □ 22,196 □ 27,348 □ 27,661 □ 25,427 □ 22,600 □ □ 2001 □ 2000 □ 1999 □ 1998 □ 1997 □ 1996 □ 1995 □ □ 22,600 □ 21,987 □ 23,010 □ 20,641 □ 16,717 □ 18,277 □ 17,705 □ □

Comparing the St. Paul/Minneapolis permits with the Metropolitan area permits shows that the vast majority of residential building is in the suburbs. In addition, it indicates the dramatic decrease in building permits in the entire metro area.

With the aging population, cost of fuel, highway congestion and lack of transit in the suburbs, the central cities will gain some individuals that want to be closer to their jobs. The employment and population declines in the Central Cities and the nationwide problems with the housing and mortgage markets are not going to be corrected quickly. St. Paul and Minneapolis have significant crime problems which will dissuade many from moving back to the central cities. The crime school problems in the central cities will be the justification many people utilize to move to the suburbs. With the large number of individuals entering retirement and loss in high quality jobs, income tax receipts levels will decline, property taxes will decline because of vacant and foreclosed upon homes. Government jobs are likely to decline. Migration rates are declining.

#### Downtown St. Paul

The SDEIS for downtown St. Paul adds 4,870 housing units (8,740 increase in population) and 26,600 additional employees. Providing parking for a single vehicle per household, and estimating 2,000 square foot housing units which includes general purpose space (hallways, elevators, entrances and amenities). Each building for housing and employment needs 1 level for building support. I calculated that each employee averages 200 square feet to include general space (hallways, bathrooms, mechanical rooms, lunchrooms, break areas etc,) for office buildings. Certainly the majority of employees in the service industry don't require offices, but restaurants, bars, entertainment facilities utilize a lot of space. I estimated 50% of the employees would drive and 50% would take transit, walk, bike or live downtown.

Reference SDEIS Table 1-3 for additional households and Table 3-5 for additional employment in 2030. Estimated additional buildings to meet the forecast population and employment increases.

Type □ Quantity □ Sq. ft. each □ Building size □ Levels □ Bu

---



Buildings □ Housing Units □ 4,870 □ 2,000 □ 400' x 400' = 160,000 sq. ft. □ 60 □ 6 - 13 story buildings □ Residents vehicle parking □ 4,870 □ 400 □ 400' x 400' = 160,000 sq. ft. □ 12 □ Included with housing □ Employees □ 26,600 □ 200 □ 400' x 400' = 160,000 sq. ft. □ 33.25 □ 2 □ 17 story buildings □ Parking □ 13,300 □ 400 □ 400' x 400' = 160,000 sq. ft. □ 33.25 □ 8 parking ramps □ □

Downtown St. Paul would need approximately 16 buildings with the number of levels in the table that are 160,000 sq. ft per level or approximately a square block. It does not include restaurants, entertainment venues, shopping, grocery stores, and recreation and skyways. How many actual buildable sites are there in downtown St. Paul to meet the space needs for 2030 projected housing units and jobs?

Downtown St. Paul is very unattractive to those moving from the suburbs and younger professionals that have the means to purchase higher priced housing or pay higher rental rates. It lacks restaurants, entertainment venues, shopping, grocery stores, and recreation. According to the most recent Dex Yellow pages for St. Paul, there isn't a single new automobile dealer in the city. The airport and Mall of America is more than a 1 hour ride on the LRT.

The larger questions are; Who are the employers? What advantages does St. Paul have compared to other locations? What additional changes in infrastructure and transit are needed to persuade them to locate in downtown St. Paul? With the current bad economy, what impact does a downtown employer that downsizes, moves or merges have upon the downtown St. Paul and transit ridership/revenue?

St. Paul's and Minneapolis's population is stable or declining. Utilization of noncurrent data misportrays and results in the incorrect decisions. The decisions made if put into action will set back rapid transit in the Metro area as the passengers, commuters and taxpayers realize the results.

### 1.3.2 Roadway system

The SDEIS reports that traffic congestion is a problem

on I-94 and that it is a critical link in the Twin cities road network. I-94 between downtown St. Paul and Minneapolis will be at capacity soon and adding lanes is impractical. Drivers are expected to utilize University and Washington Avenue for relief which would increase congestion on the crossing arterial roads as well as University and Washington Avenues. As congestion increases, the remaining I-94 buses will be delayed and vehicles will get off the freeway and go on the local arterial streets. The Central Corridor Light Rail does nothing to help reduce the primary congestion problem in the Central Corridor study area.

### 1.3.3 Transit

The DEIS included average performance times for Route 16, 50 and I-94B,C and D. I was never able to find any report, table or chart with time savings in the DEIS. After 2 months of phone calls and e-mail requests, and nearly notifying threatening the Minnesota Data Practice Act, I met with several several Central Corridor and Met. Transit employees. Within a few days the bus schedules that were utilized on the draft environmental impact statement were provided. I compiled the scheduled bus times for the entire daily schedule for Route 16, 50 and I-94B,C and D and averaged the time for the comparable LRT route.

The average bus performance times utilized in the draft environmental impact statement were higher than the applicable schedules that were in effect when the draft environmental impact statement was prepared and are higher than they are on the current bus schedules. The actual bus transit times were incorrect on draft environmental impact statement and thus the cost effectiveness index was incorrect. The Federal Transit Administration may never have funded this project if the correct times were utilized.

In analyzing the present central corridor bus service, Route 50 and I-94 bus routes were extended in downtown Minneapolis. That increased the schedule time 2 minutes for westbound buses. That would reduce the average schedule time by 1 minute.



0:10 Route length increased 4 blocks. Increased the schedule time 1-2 minutes because of the the I-35W bridge collapse. LRT N/A N/A 35 40:00 According to the SDEIS

In the 6 - 7 years since the DEIS, Route I-94 buses average time is less than it was in 2001/02. The Route 16 buses increased 30. seconds. I've observed Route 16 and 50 buses on University Avenue during rush and non rush hours. The buses often are slowing down to stay on schedule. The bus schedules could be compressed. There is only 2 locations with congestion; The University of Minnesota and downtown Minneapolis.

The existing times are inaccurate and those who prepared the DEIS should provide their documentation to support their findings. This has a major impact upon the calculation of Cost Effectiveness Index. There isn't any basis for the performance time forecasts given the minimal changes in average performance in the 6 -7 year, the loss in population and employment and less congestion on the roads. The entire time savings calculation needs to be recalculated.

A review of the previous and current bus schedules reveal additional interesting information. Bus travel times increased in downtown Minneapolis after the Hiawatha LRT started operations. The at grade LRT caused rerouting of buses and vehicles onto less streets. Some buses have an extended turn around route. There are more buses in downtown Minneapolis with the increase in ridership on local and especially express buses from the suburbs. There is more automobile congestion with lane reduction on the LRT route. Crossing the LRT line increases congestion and adding the Central Corridor will increase the impact upon vehicles with a marginal decrease in bus traffic which will be quickly negated by the increased suburban ridership from I-35 and Cedar Avenue and other routes. Every time you adjust routes on a finite road system, you negatively impact someone else. Travel time on I-94 between St. Paul and Minneapolis is nearly identical except for the 1-2 minute increase between Snelling Avenue in St. Paul and downtown Minne

apolis. That increase was recently enacted and is likely the result of the collapse of the I-35W bridge, rerouting vehicle traffic onto I-94, loss of the shoulder for bus use and downtown congestion.

#### Chapter 5 Economic effects

Property values will increase and have an adverse effect upon low income individuals, families and many small businesses. Even if property values remained unchanged, the larger tax subsidy will adversely affect them.

This entire project is paid from taxes plus interest which probably more than doubles the total cost. In addition, the transit vehicles and probably some other items are manufactured in a foreign country which adversely affects our balance of payments.

#### Chapter 6 Transportation Effects

Drivers will lose time caused by prioritizing traffic signals, adding 6 traffic signals on University Avenue, manipulation of traffic signals for optimal light rail performance, reducing the lanes available for vehicles and increased congestion caused by the Central Corridor Light Rail. The financial impact will be hundreds of millions of dollars in wasted fuel and millions of hours in lost time by vehicle occupants.

The type of right of way utilized by the Central Corridor incurs the largest number of accidents with pedestrians and vehicles. The Metropolitan Council does not properly calculate the total impact of various approaches and does not take into account the time and costs of others that share this metropolitan area.

LRT riders will lose millions of hours because of the slowness of the Central Corridor LRT. Use your computer and calculate the lost time by transportation analysis zone if you had LRT that traveled the entire length from 25 -30 minutes instead of 40+ minutes. How many additional revenue paying passengers would you attract. How much congestion could be relieved from I-94? The impact by the lost opportunity is tremendous.

Refer to SDIS Table 6-5 for average daily traffic level

---

s Traffic levels in 2006 have generally decreased in 11 out of 12 segments since the 2001 counts utilized in the DEIS. How would utilization of more accurate population, employment and development data impact travel demand and performance of the buses?

## Chapter 8 □ Financial Analysis

### Capital Cost Estimate

The financial aspects of this project are terrible. The cost per mile in 2014 would be approximately 91.8 million dollars. That is the second highest cost LRT project in the United States. The average LRT project cost is approximately \$35,000,000.00. The Central Corridor LRT project is at grade, the tunnel was deleted, there is a new bridge across I-35W, there isn't any underground or elevated stations. Where is your fiscal responsibility to provide to provide rapid transit at a cost within reason? This project should have cost \$500,000,000. The cost of the infrastructure is estimated at \$415,500,000.00. The estimated cost of professional services for the infrastructure is \$163,527,012.00 which is more than 39%. I purchased, coordinated and managed acquisition of Architect-Engineering Services for a Federal Agency for many years and I would have never considered payment of that ridiculous amount for 9.9 miles of uncomplicated new LRT. There is also the additional costs that are not included in the Central Corridor project costs including the Union Depot Station, the 3 additional transit stations and some of the road changes around the University of Minnesota and perhaps others which I'm not aware. Our minimal transit dollars should be getting maximum transit results.

#### 8.2.1 Operating and Maintenance Costs

The Central Corridor LRT operation and maintenance costs are excessive because; slow speed, excessive number of stations, 30 mile per hour speed limit, approximately 40 traffic signals, operating in a shared right of way almost the entire length, sharing the road with a large number of vehicles and lengthy layover times. That increases the number of vehicles, operators, security personnel, maintenance and administrative staff and supervision. Maintenance/storage facilities need to be larger

and more replacement parts and replacement vehicles required. The supplemental environmental impact statement states that dedicated transit taxes and general taxes are revenue. Taxes are a subsidy. The chart below factors inflation at 3% and 4% through 2030.

Annual Operating and Maintenance costs with 3% and 4% inflation through 2030

2007 □ 2014 □ 2020 □ 2025 □ 2030 □ □ \$53,900,000 □ □ □ □ □ 3% inflation - approximately □ \$66,000,000. □ \$79,000,000. □ \$91,000,000. □ \$106,000,000. □ □ 4% inflation - approximately □ \$68,200,693. □ \$89,747,455. □ \$104,991,820 □ \$127,738,580. □ □

How much new passenger revenue will be brought in by the Central Corridor Referring to table 6-2 transit ridership forecasts for 2030, the forecast increased Central Corridor boardings is 11,300. I estimated a \$3.50 the average fare in 2030, which is more than double the present fare.

Calculation of Central Corridor additional passenger revenue in 2030

Day □ Additional corridor trips □ 2030 average bus fare □ Daily increase in revenue □ Annual increase in revenue □ □ Weekday passenger revenue per day X 255 days □ 11,300 □ \$3.50 □ \$39,550.00 □ \$10,085,250.00 □ □ Saturday passenger revenue per day 60% of weekday ridership X 52 days □ 6,780 □ \$3.50 □ \$23,730.00 □ \$1,233,960.00 □ □ Sunday passenger revenue per day 50% of weekday ridership X 58 □ 5,650 □ \$3.50 □ \$19,775.00 □ \$1,146,950.00 □ □ Total estimated additional passenger revenue in 2030 in the central corridor □ □ □ □ \$12,466,160.00 □ □

The implementation of the Central Corridor LRT will result in cancellation of the Route 50 buses and lengthening the headway for Route 16 and I-94 buses. Extra buses will be utilized to feed the Central Corridor LRT and others are likely to be programmed on other routes. The best way of comparing and project is total passenger revenue and costs before and after. advertising revenue in most cases is a shared revenue and not a direct result of the Central Corridor LRT. Taxpayers are probably going to subsidize the Central Corridor LRT for 80 □ 85% of the operation and maintenance costs or \$85 □ 9

0 million dollars in 2030. The taxpayers are going to be very displeased and other transit riders are likely to see even larger fare increases.

Building three first LRT systems primarily within the local rate structure, providing park and ride facilities at high cost with no revenue is poor financial and transit management. Transit ridership doesn't mean anything. Additional revenue, effective use of revenue producing equipment and operating and maintenance costs are the important factors. The supplementary environmental impact statement doesn't include passenger revenue or cost breakdowns.

### History

The Central Corridor was and is severely impacted by the construction of I-94. It was a complete disservice not to help the neighborhood at that time and ever since. The Hiawatha LRT route negatively impacted Minneapolis for 30 years. First the homes and businesses in an approximate 50 block area were purchased. A guestimate 3,000 - 5,000 residents were displaced and many moved from Minneapolis. The land sat unutilized. The property tax burden fell on the remaining residents. Many surrounding businesses, churches and other organizations were negatively impacted and eventually failed. The remaining residents had to travel further. Metro Transit lost ridership for the entire period and I would bet that bus service was reduced in the corridor. Now we hear about the Hiawatha LRT growth in housing. It took 30 years to perhaps restore the housing units. Show me the number of new jobs and types of jobs. Minneapolis had a underutilized rail line 1 block east of the present route. What a waste!



# Central Corridor Light Rail Transit

## Supplemental DEIS Comment Sheet

**Name:**

Sheldon Gitis

Please take a moment to share your comments on the Central Corridor Light Rail Transit project in the space provided below. Your comments will be transcribed in the public hearing record and responded to in the Final Environmental Impact Statement. Thank you for taking the time to share your views on this important transit project.

In comments on the DEIS for the Central Corridor project, the City of Minneapolis stated: "The City of Minneapolis supports the future construction of Granary Road through the SEMI (Southeast Minneapolis Industrial) redevelopment area. The benefits of Granary Road connecting to the Pierce Butler and Phalen corridors in St. Paul need to be better recognized as (a) mitigation measure to traffic operations(,) limitations(,) and challenges along University Avenue created by Central Corridor LRT. The Granary corridor will provide operational and capacity relief to University Avenue and will provide a viable detour route as the project is constructed. This corridor has been designated as an A-minor Augmenter by the Metropolitan Council and will eventually connect I-35W to I-35E."

<http://www.regionalrail.org/DOCS/Public%20Comment%20Record/Comment%2007%20Official%20Comment%20on%20DEIS.pdf> Rather than considering the "benefits" of an additional I-35E to I-35W expressway to accommodate horrendous volumes of suburban commuters, driving into, out of, and through all the St. Paul neighborhoods from Phalen to St. Anthony Park, the Metropolitan Council should consider putting a frequent, high capacity public transit service on the Central Corridor route connecting Phalen Boulevard to Granary Road.

To send your comments electronically, please click Send. To send your comments via U.S. mail, please print this document and mail to: Kathryn O'Brien  
Central Corridor Project Office 540 Fairview Avenue North St. Paul, MN 55104

**The final date to receive comments is August 25, 2008**



# Central Corridor Light Rail Transit

## Supplemental DEIS Comment Sheet

Name: Laura Henry Email: laura plus terry @ gmail.com  
 Address: 406 Wacouta Unit 208 St Paul, MN 55101

Please take a moment to share your comments on the Central Corridor Light Rail Transit project in the space provided below. Your comments will be transcribed in the public hearing record and responded to in the Final Environmental Impact Statement. Thank you for taking the time to share your views on this important transit project.

### Light Rail to Serve the People

The Hawthorn Line has passed all ridership expected; why? It serves the public for transportation to Mall of America, Airport, Humphrey Dome & Duluth.

The proposed line misses an opportunity to serve St. Paul. It comes to the middle of a congested downtown. If it were to travel Kellogg Blvd. after crossing Dtl. 94 it could serve:

- St Paul Cathedral
- Minnesota History Museum
- \* Transit Center
- River Center of Xcel
- Roy Wilkins
- Orchestra
- Conference of Visitors Bureau

- Library
- City Hall
- Ransay Sport Center
- Hotels
- Judicial Courts
- School
- Public T.V.

United Hospital  
 Science Museum

also the street is a Blvd. with a center median.

Please reconsider. Thank you.

Union Rep. & Concern

Laura

To submit your comments electronically, please visit the website at [www.centralcorridor.org](http://www.centralcorridor.org) and click on SDEIS under "hot topics".

To send your comments via U.S. mail, please print this document and mail to:

Kathryn O'Brien  
 Central Corridor Project Office  
 540 Fairview Avenue North  
 St. Paul, MN 55104

The final date to receive comments is August 25, 2008

Received  
 AUG 12 2008  
 CCPO/Met Council

**Terry J. Henry**  
**406 Wacouta Street**  
**Saint Paul, Minnesota 55101**  
**Telephone: (651) 717-4801**  
**Email: [lauraplusterry@gmail.com](mailto:lauraplusterry@gmail.com)**

August 18, 2008

RE: Written comments to Supplement My Verbal Remarks to the Met Council on August 9, 2008, Pertaining to Supplemental Draft Environmental Impact Statement (SDEIS)

Central Corridor Project Office  
ATTN: Kathryn O'Brien  
540 Fairview Avenue North, Suite 200  
Saint Paul, MN 55104

Dear Ms. O'Brien:

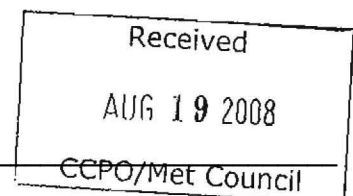
This letter is an add-on to my verbal comments concerning the planned location of the Light Rail Transit (LRT) Tracks on the east side of Cedar Street in Saint Paul, Minnesota, approximately 28 feet from top steps of Central Presbyterian Church (in downtown Saint Paul), 500 Cedar Street, Saint Paul, MN 55101, [www.cpcstpaul.org](http://www.cpcstpaul.org). *As a member of the Church, I believe this LRT plan will severely handicap Central Church.*

While the SDEIS discusses the physical construction of historic church buildings such as Central Presbyterian Church but not much what churches do, your document should discuss the important work of churches: worship and service to people. Central Presbyterian, for example, is open for business seven days a week, days, evenings and sometimes overnight. Central's services include

- Sunday worship and other religious services during the week
- Weddings and funerals
- Religious education services for all people in Saint Paul
- Educational classes in language skills and computers for immigrants
- Counseling, social services and wardrobe assistance to the poor
- Beds and food for the homeless
- Musical performances as an outreach service
- Noon luncheons for workers in the downtown area
- Displays of fine art
- Rummage sales
- Teas and other social events for seniors
- Facilities for Alcoholic Anonymous and other organizations
- Civic meetings and services for the people of Saint Paul: Example -- Central is now working with Ignatian Associates, a lay apostolic community, to provide a "Peaceful Presence"—a sanctuary at Central where anyone can come during the upcoming Republican National Convention, September 1 – 4, 2008, 8:00 AM to 8:00 PM. The sanctuary will be an interfaith place of quiet for private prayer and contemplation.

Central Presbyterian Church property is on the east side of Cedar Street in downtown Saint Paul and includes the church building and its dead-end alley on the north side of the building that is only accessible from Cedar Street. Private property surrounds all other parts of the church property. **With the exception of its frontage along Cedar Street, Central is landlocked by private properties.**

I understand that LRT traffic will travel past Central as often as every seven to ten minutes. This action will impede public access to the church building.



Page 2, Written Comments to Supplement Verbal Comments, August 13, 2008

Locating the tracks on the east side of Cedar Street will cause the following:

- The noise and gonging produced by the trains will interfere with Sunday worship services. This noise will occur during all seasons of the year but will be more oppressive during the summer months because Central cannot afford to air condition the large sanctuary and must open its front doors to the outside air. (*I believe that the planned LRT will probably interfere with my U.S. Constitution First Amendment Rights to worship without government interference.*)
- High quality musical events will not be possible at Central Presbyterian Church.
- I understand that St. Paul District Energy will have to pay for the relocation of the underground heating and cooling utilities, and appropriately increase the fees charged to all customers. However, I believe that Central will have to pay for the relocation of the other underground utilities servicing the building. We are a struggling downtown church.
- LRT traffic will interfere with delivery of supplies and services through the alley next to the church building. Central must relocate its trash dumpster that is in the dead-end alley and as well as its only ADA certified wheelchair ramp necessary to enter the church building.
- The elderly, some of whom have hearing, vision, and mobility disabilities, form a large part of the congregation. They will have great difficulty alighting from vans and vehicles and participating in worship.
- The seamless transferring of caskets between hearses and the sanctuary for the funeral services will necessitate complex coordination with the LRT.
- The multiple LRT trains passing Central will truly interfere with wedding ceremonies
- The LRT will obstruct the ability of Central to conduct outreach services to minister to people in the downtown area by limiting access to the church.

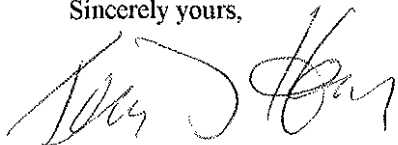
During my recent LRT tour, your rep said that the Light Rail planners would work to relieve the stressors on Central's situation. This information should be in writing and attached to the SDEIS to allow for careful consideration.

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

Instead, I wish that planners had considered locating the tracks on portions of Kellogg Boulevard. Mimicking the success in LRT in Minneapolis, the Saint Paul LRT could serve a higher number of people who want to travel to the Xcel, the River Center, the Ordway, and numerous hotels as well as providing good access to government include Saint Paul City Hall, Ramsey County Government Center, and the courts. Perhaps, the new Transit Center on Smith Avenue would be a good interconnection point for busses with new routes in the downtown area. Finally, the LRT could easily link with the **Saint Paul Skyway System** to make possible easy, safe, quick and sheltered walking to all other parts of Saint Paul's compact downtown.

The motto of Central Presbyterian Church is *In the City for Good*. Older than the State of Minnesota, the Church works to serve the needs of the people in downtown Saint Paul. I believe that the current LRT planning for placing light rail on the east side of Cedar Street could result in the possible end of the Church. Thus, the doors of Central could close forever.

Sincerely yours,



Terry J. Henry, Ph.D.

Remarks by Andrea Lubov to the Metropolitan Council  
Comments on the Supplemental Draft Environmental Impact Statement  
August 4, 2008

Mr. Chairman, members of the Metropolitan Council

My name is Andrea Lubov. I am a resident of St. Paul; I was a member of the St. Paul station area planning committee, and I have, as a member of Jewish Community Action, actively worked with the Transportation Equity/Stops for Us coalition to have the Central Corridor LRT stop at Hamline, Victoria, and Western Avenues. Working to obtain these stops is consistent with the JCA mission to eliminate social and economic injustice.

I believe I bring a unique perspective to this discussion. I am a retired economist with a Ph.D. from Washington State University. I have over 30 years experience looking at the economic impact of public policy. When I retired at the end of 2004, I was a partner in the firm Anton, Lubov and Associates, where I had the opportunity to work on the master plans for the Franklin and Cedar-Riverside stations of the Hiawatha LRT and I also worked on the early economic impact analysis for the Central Corridor.

There are serious problems Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor. These problems center around underestimating the negative impact the line will have on the minority, poor, and transit-dependent populations that live along the corridor. The report underestimates the negative economic impact of the LRT because the report authors incorrectly compared the Central Corridor population with the total population of Hennepin and Ramsey Counties. The authors *should have compared the Corridor population with the non-corridor population* of the two counties. Instead they compared the Corridor population with the *whole population* of the two counties. Because of this error, the report understates how much the corridor differs from the rest of Hennepin and Ramsey Counties. The corridor contains significantly more people of color and its population is poorer and more transit dependent than the rest of the two counties, and those differences are statistically significant. While the report claims that the minority and low-income population will not bear a burden that is "... more severe or greater in magnitude than the impact felt by the community at large" (p.138), the fact that the minority share of the Corridor population is twice as high as the rest of Hennepin and Ramsey Counties, and the poverty rate is more than three times as high means that minorities and poor people *will* be bearing a more severe and greater impact than the community at large. Oddly, nothing in the methodology section shows how the report authors came to this truly startling conclusion.

Let me give some examples of how the data as presented in the report fails to highlight how the corridor differs from the rest of Hennepin and Ramsey Counties. In these examples I'm using the data that appears in the report, but reporting it slightly differently. Table 3-15 of the SDEIS shows that approximately 20 percent of the population in Hennepin and Ramsey Counties are members of ethnic minorities and 41 percent of the corridor population are ethnic minorities. Comparing the corridor with *the rest of the two counties* changes the emphasis. Ethnic minorities are 18 percent of the population outside of the corridor. Thus, ethnic minorities constitute more than twice the share of the population in the corridor than in the rest of Hennepin

and Ramsey Counties. While the Corridor contains slightly more than 9 percent of the Hennepin and Ramsey County population, *it contains nearly 19 percent of the minority population of the two counties*. Clearly, the Corridor differs from the rest of the two counties.

Similarly, poverty in the Corridor is much more severe than in the rest of the two counties. In Table 3-16 it looks as if poverty in the corridor is twice the poverty rate in Hennepin and Ramsey Counties. In fact, it occurs at more than *three times the rate* of the non-corridor portions of the two counties.

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

As for the stations at Hamline, Victoria, and Western Avenues, referring to them as "proposed stations" only emphasizes the notion that the stations may never be built. This language implies that building the infrastructure for these stations is really a way to quiet the transit-dependent communities by offering to meet their needs while assuring that ethnic minorities and the transit dependent population are not likely to get the stops they want and need. If we fail to build at least one of the 3 stations by the time this LRT line is constructed, I'm afraid we will be repeating and compounding the errors made when Interstate 94 was constructed and the Rondo neighborhood bore a disproportionately large share of the social costs and received a disproportionately small share of the social benefits of the interstate.

Table 3-15 SDEIS, page 140, as presented

## Population and Percent of Total Population by Identified Racial or Ethnic Heritage

Race/Ethnicity	Hennepin County		Ramsey County		Central Corridor study area	
	Number of Persons	Percentage of Total	Number of Persons	Percentage of Total	Number of Persons	Percentage of Total
White (Non-Hispanic)	898,921	80	395,406	77	88,220	59
Black or African-American	99,943	9	38,900	8	28,360	19
Hispanic or Latino	45,439	4	26,979	5	11,655	8
Asian	53,555	4	44,836	9	17,303	11
All Others	63,781	6	31,893	6	16,695	11
Total	1,116,200	100	511,035	100	150,578	100

Table 3-15 re-presented to highlight ethnic differences between Central Corridor study area and the rest of Hennepin and Ramsey Counties

Race/Ethnicity	Non-corridor portion of Hennepin and Ramsey Counties		Central Corridor study area	
	Number of Persons	Percentage of Total	Number of Persons	Percentage of Total
White (Non-Hispanic)	1,294,327	80	88,220	59
Ethnic and racial minorities	332,908	20	88,220	41
Total	1,627,235	100	150,578	100

Table 3-16, as presented (p. 3-144)  
 Table 3-16 2000 Census Population Characteristics

Characteristic	Hennepin County		Ramsey County		Study Area	
	Population	Percentage of total County Population	Population	Percentage of total County Population	Population	Percentage of total Study Area Population
Persons Below Poverty Level	90,384	8.3	52,673	10.6	34,737	23.1
Median Household Income	\$51,711		\$45,722		\$29,956	

Table 3-16 re-presented to highlight poverty in the study area

Characteristic	Non-corridor portion of Hennepin and Ramsey Counties		Study Area	
	Population	Percentage of total non-study area Population	Population	Percentage of total Study Area Population
Persons Below Poverty Level	108,320	7.34	34,737	23.07
Median Household Income	N.A. <sup>a</sup>		\$28,956 <sup>b</sup>	

<sup>a</sup>Median income in the non-study area needs to be re-computed, but to do so requires identifying the block groups in the study area. This information was not available in the SDEIS.

<sup>b</sup>Median income in the SDEIS was computed incorrectly, but the difference between the reported value and the correct value is probably very small.



August 20, 2008

Central Corridor Project Office  
Griggs Midway Building, Suite 200  
540 Fairview Avenue North  
St. Paul, MN 55104

Via Certified Mail

Attn: Kathryn O'Brien

**Statement for the Supplemental Draft Environmental Impact Statement  
Regarding the Impact of the Proposed Central Corridor LRT  
on the Cedar-Riverside Neighborhood**

The net impact of the proposed Central Corridor LRT line on the Cedar-Riverside neighborhood of Minneapolis will be negative.

**1. Mass transit service will be diminished in Cedar-Riverside.** The new light rail line will have many fewer stops, compared to the present Nr. 16 bus that runs on essentially the same route. Transit time of the new trains will be approximately the same as the present limited stop Nr. 50 bus that runs on the Nr. 16 route. Local authorities state that the Nr. 16 bus will continue to run, but at a much reduced frequency. In other words, the proposed LRT line simply replaces the Nr. 50 limited stop bus, and passengers who wish to stop at other destinations along the route will have to wait much longer than at present for appropriate service by Nr. 16 bus.

**2. Diminished mass transit service will be a hardship for the handicapped and elderly.** An unusually large number of handicapped and elderly individuals live in Cedar-Riverside, particularly in the subsidized units of Riverside Plaza (said to be the highest housing density in the U.S. west of the Mississippi) and The Cedars complex of the Minneapolis Public Housing Authority. Reduced frequency of Nr. 16 bus service and the typical distance of one mile between stations on the proposed Central Corridor LRT line will put the handicapped and elderly at a great disadvantage. A basis for action may exist under the Americans with Disabilities Act or other legal provisions.

**3. Altered automotive traffic patterns will harm the businesses, and inconvenience residents of Cedar-Riverside.** The bridge from the west bank of the Mississippi to Washington Avenue S.E. on the east bank is part of a major arterial street (Highway 122) connecting downtown Minneapolis and Cedar-Riverside to the main campus of the University of Minnesota and University Avenue S.E. According to the University, the bridge ordinarily carries about 20,000 vehicles daily (25,000 during the unavailability of a 35-W bridge). Proposed changes to place LRT on two lanes of the bridge and use the remaining two lanes only for traffic to and from East River Road will dramatically isolate Cedar-Riverside.

Given such a drastic change in traffic patterns, it's apparent that motorists will have to make a special effort to reach Cedar-

SDEIS Statement

-2-

August 20, 2008

---

Riverside from across the river, especially during daily peak traffic hours when I-94 is congested. Routes via the 10th Avenue bridge and the Franklin Avenue bridge will become the most direct means, but those routes will also be more congested from through-traffic due to access to the Washington Avenue bridge only circuitously from East River Road. As a result, businesses of Cedar-Riverside cannot help but suffer harm.

Many of the businesses of Cedar-Riverside are financially marginal, and despite decades of subsidies as a federal urban renewal area, the Minneapolis Neighborhood Revitalization Program currently classifies Cedar-Riverside as a "Revitalization" neighborhood. We cannot afford the increased isolation that will only cause more problems and difficulties for our struggling neighborhood.

Sincerely,



David Markle

David Rasmussen  
409 Roy Street North  
Saint Paul, MN 55104  
August 7, 2008

Ms. Kathryn L. O'Brien, AICP  
Project Manager, Central Corridor Project Office  
540 Fairview Ave. North, Suite 200S,  
Saint Paul, MN 55104

Thank you for accepting my comments.

The key points:

- Marketing studies are critically important to ensure money is well spent
- Rail will not necessarily increase transit use
- Service standards for the Hiawatha line indicate no effort to increase transit use.
- Park and Rides are critical; the "bus barn" site would be an ideal location
- Reducing carbon emissions should be a goal
- Transit in the United States does not "compete" with the rest of the world
- Toward Safety at Snelling and University, the station should be underground
- Toward campus safety, the line should be underground

## Marketing Studies are critical to ensure money is well spent

A complex process of politics, government regulations and neighborhood involvement has gotten us to the point where we are at, but a comprehensive marketing analysis based on systematically talking to random residents of Saint Paul to define the needs and desires of potential rail users has never been completed, making it unclear whether the proposed new rail would actually be viewed as a positive development by the majority of residents once they understand exactly what is proposed.

I concur with the testimony of Union Park District Council, as agreed to at their August 6, 2008 Board meeting, that it is critical to validate that the proposed Central Corridor Light rail line meets the needs of local residents, and that it would be irresponsible to proceed to the construction phase of the project without one.

I suggest a total sample size of 1000-- two randomly selected pools of about 500 "captive riders" and 500 "people with transportation options." Participants will need to be paid for their time, and perhaps also entered in several lotteries to assure high levels

of participation in a process that should take about 90 minutes. The process will involve clearly explaining what is currently planned and then polling the resident about their opinion of the mass transit options now, and in the future. The survey will determine the expected number of Central Corridor riders assuming the current plan and a broad range of scenarios, many of which are not consistent with the current funding of the rail project.

Only through a process such as this will it be possible to assess whether the rail project will meet the needs of residents, or whether major changes might be required if funding is to be responsibly spent.

From Union Park District Council Testimony:

6. The need for comprehensive marketing studies to determine how the Central Corridor LRT plans can best meet the needs of both captive, transit-dependent bus riders and those who have a choice of transportation options. Many changes have occurred since the basic LRT alignment was determined in 2001, not the least of which is the doubling of gas prices. UPDS recommends that a quantitative marketing study be undertaken to determine if the rail line as proposed will effectively meet the current and future transportation needs of Saint Paul, Minneapolis and greater metro area transit riders.

Any corporation contemplating a billion dollar investment would not move forward without an up-to-date marketing survey to assess the viability of their new product or service to attract new customers and meet the needs of regular clients. As the Central Corridor project prepares to move forward into final design, it would be irresponsible to proceed without a reality check to see if current plans, that are largely based on earlier assumptions, remain valid today.

UPDC urges that a professional marketing company be retained to do a quantitative marketing study, using randomly selected local residents, to determine the actual needs and demands of future light rail riders. The range of questions **should** address such issues as:

- whether station locations are optimal and optimally spaced;
- whether park-and-rides are needed to accommodate those not directly adjacent to the line;
- whether planned transit speeds will meet people's needs or if higher speeds would attract more new riders;
- how fare increases would affect ridership;
- the potential impact of even higher gas prices on future ridership;
- what rider incentives would be most effective in attracting new riders; and

- how issues of safety, comfort, pedestrian access, bicycle access and business parking would affect the success of the new LRT as a transit improvement and economic stimulus to encourage new development.

## Increasing Transit Use Can Not Be Assumed With Rail

The Cato Institute (Libertarian) not surprisingly is **critical** of Portland's light rail system. It's slow, expensive, has not relieved congestion, and taxpayers are no longer voting for it. Their point of view is **rebutted** (sort of) by the transit department. Portland's light rail system is popular and cheaper per passenger than buses.

I assume both sides are factually correct. I have a point of view, as well.

When I visited Portland in 2004, the light rail was of zero use to me. I would have liked to use it, but it was miles away, on the other side of the river, in the Yuppie part of town. I still might have used the light rail except that once I was across the river with my car, I could only find short-term metered parking spots, and they were rare. If I had taken the light rail, I would have gotten a parking ticket.

I am pleased that the light rail line connecting downtown Minneapolis to the airport and the Mall of America is popular and cheaper than buses, as is true in Portland. The Hiawatha line is underground at the airport and at the Mall of America, and uses an old rail right of way much of the way. I am afraid that the St. Paul light rail line connecting the two downtowns will be slow, expensive, and will not relieve congestion, as in Portland, since the budget, and federal cost effectiveness measures demand it be entirely at grade. Portland provides no panacea, yet it is often cited as the model for St. Paul's planned light rail system.

## Service Standards for the Hiawatha Line do not indicate value

I viewed the June, 2008 SDEIS for the Central Corridor Line, which speaks of meeting the needs of low income people, and does not address the needs of moderate to high income people. I wonder if the Metropolitan Council actually wants their lines to be of value to the general public, or would prefer to exclusively serve low income riders, grateful if a train merely arrives.

Officials of BART, San Francisco Bay area, were talking about adding WiFi access to their trains and train stations in the early 2000's. Internet access, enclosed shelter and similar needs would be discussed thoroughly in the SDEIS if it was not assumed that the only people who will use the train are those who have no alternative.

2000 Census data and rider surveys indicate high percentages of students and low income people along the line, but as gas prices increase, more people are riding for economic reasons. There is also an increasing cohort of environmentally conscious people who ride transit to reduce green

house emissions. The standard of living of those near the line is likely improved in 2008.

But, the three most recent experiences that my family has had with the Hiawatha Line indicate that Metro Transit is doing their best to discourage new riders:

February 2, 2008, 6 p.m., Downtown Minneapolis, following the Barack Obama Rally at the Target Center  
long lines for tickets; three trains pass before I am to the front of the line; the automated ticket printer has run out of paper; I use the Hiawatha line without a ticket

April 17, 2008, 6 p.m., Franklin Avenue Station, preceding a Twins game  
ticket machine will not accept bills, only coins; kids ask for quarters but we have none; I am with an employee of Metro Council, so he tells me that I can ride the train on his word

July 2008, 10 p.m., Downtown Minneapolis:  
attempt to enter train at terminus, but door never opens; enter the next train when it lets off people and wait 15 minutes for it to move; train stops for each downtown Minneapolis light; train goes past the Metrodome just following a Twins game; transit worker pushes people onto the train which is filled to capacity and says "this is what mass transit is like"

If these are the service standards we can expect from the Central Corridor rail, my family is better off with buses.

## Park and Rides are Critical

A billion dollar rail is being built connecting Saint Paul and Minneapolis. Give the advocates credit for pushing this through. Who will actually ride the train? The people who currently ride the bus will most likely continue to use public transportation. Those who have no other choice are a captive market. Anybody else?... Bueller?... Bueller?

As someone who takes the bus to Twins games and walks to the grocery store, I admire the goal of driving less. However, anti-car policies, such as not building park-and-rides because we do not want suburbanites to bring their cars to Saint Paul, strike me as hypocritical and counter-productive. Hypocritical, because the weather in Saint Paul causes even the most strident inner-city activist to use their car on occasion. Counter-productive, because if Saint Paul is to thrive, it must be accessible, and if people find the city too hard to get around, they can always go somewhere else. Where I have seen park-and-rides in the San Francisco Bay Area, Chicago and the Saint Louis Central Corridor, I have seen park-and-rides that are used beyond their capacity.

The city of Saint Paul has a marketing director. I hope she is brought into the picture once she has some free time after the Republican convention.

My questions to her include these:

How much of the success of the Hiawatha line can be attributed to the giant "park-and-ride" at its southern tip, the Mall of America, with 13,000 easy to find parking spaces available not far from the below grade train station?

Why are car owners going to use the rail?

How can public transportation be made more useful for people?

The advocates that are getting the rail built should be convinced by marketing data that park-and-rides need to be built in order for this rail line to be successful, even if they may be adamant that parking be made available only to people who drive Dodge Volt plug-in electric cars.

That would be an improvement over the current position, as becoming forward looking, rather than bemoaning the loss of the streetcars, would be a positive development. If we are going to spend one billion dollars or more, we should design a rail to meet the future transportation needs of Saint Paul and Minneapolis. The new rail line, as designed to date, is an albatross that could easily cost addition billions to make right.

## The Bus Barn Site Would Be An Ideal Place for a Transfer Station and Park and Ride

The "bus barn" site at Saint Anthony and Snelling offers an ideal location for a major light rail station near University Avenue (Central Corridor) and for a future Snelling Avenue light rail line deserving of future study. This site offers the possibility of underground commuter parking and retail development at a prime location that has remained undeveloped despite the efforts of many. Here is a location where the possibility of major economic development in conjunction with Central Corridor rail construction can be tested now.

One suggestion is to develop under Midway Center. A road from Saint Anthony Boulevard and the Midway Center would lead to underground parking and a transit station park and ride. The underground lot would drain underneath Snelling Avenue to an I-94 West freeway on-ramp. The underground lot would also drain to the East, at Hamline, to help funnel traffic to I-94 East. The Hamline exit of I-94 West would be a primary access point to this proposed road off Saint Anthony Boulevard.

The current Central Corridor design will add congestion and reduce safety, especially at already unsafe intersections, such as Snelling Avenue and University Avenue. The rail line, competing with auto traffic, will be too slow to be of use to many residents, thus limiting its value. Many supporters of this line view it as an economic development project rather than a transportation project, however the focus must be to correctly design a transportation system, if economic development is to take place. Even without the proposed at grade rail station, Snelling Avenue at University Avenue gridlocks and is unsafe for autos, pedestrians and bicyclists. This occurs every day during the State Fair. Snelling Avenue near I-94 is the most unsafe area in the state of Minnesota based on traffic accident rates, but current rail design does not sufficiently reflect this fact.

**10/24/07:** A meeting is held to design the Snelling and Lexington stations. Several people suggest that a park and ride near the Snelling Avenue station would only "encourage more driving." None of these people get on the bus on this nice Fall day to return home. One can only assume that these people drove to the meeting.

## Reducing Carbon Emissions Should be a Goal

What can be done to reduce emissions toward achieving Kyoto goals? In cities, auto dependence can be reduced via improved public transit.

Light rail in my city is favored based on a perception that it will improve property values. However, the people that support public transportation worry about costs so much that they are designing systems that only current bus riders will consider using. "We" will continue to drive on our grid-locked roads and the value of our houses will increase. "Those people" without cars (renters) will ride public transportation whether we make them wait outside in below zero weather, and whether public transit is twice as slow as the drive. "We" buy into our full color 17" x 24" report with the rhetoric of spurring development. "We" infer increasing property values, based on examples that are better designed, and then build the rail line.

It is a starvation of funds that leads us to create the rail projects for "those people", not the rest of us. The total FTA [budget](#) for public transportation is less than \$10 billion per year. (Keep in mind that a status quo cheaply designed light rail line in a city costs at least \$1 billion, and to network a city will cost at least \$15 billion.) This is why American cities have not built subways in the past fifty years, except for BART in San Francisco, the Baltimore line and the Metro rail in D.C., each 25 years ago, if you want to count them-- much is above ground.

We need to increase the federal budget for public transit, perhaps to \$100 billion. Both "we" and "those people" end up with fast, comfortable transit. America is on its way toward achieving Kyoto goals. And, maybe, there is less reason to start optional wars in the Middle East.



Is this a difficult idea to sell to ourselves?

I looked up [causes of death](#) in Wikipedia. Lung cancer: 938,000 deaths. Car accidents: 669,000 deaths. People quit smoking based on safety. Would we quit driving if we understood our lives depend on it?

Or, maybe, I want to compete with the rest of the world and be number one. If we recognize how far behind American transit is, my vanity will kick in, and Silicon Valley and Detroit will design something first class. The rail line from [Hong Kong](#) to the airport leaves every twelve minutes and offers flat screen displays and live video and internet for every seat. Kyoto, a city of 1.5 million, switched from streetcars to a subway system.

Transit in America is a long way from [Kyoto](#).

## Transit in the United States Does Not Compete with the Rest of the World

What are some goals that rail could achieve?

Rail could provide faster, more economic, more convenient transportation than alternative means. Mass transit could reduce the need for cars and reduce pollution and greenhouse gases. But, unless it is more convenient and fast to ride the rail than it is to ride buses and cars, then NOTHING is being achieved, as the rail will not significantly increase the use of mass transportation. This has been typically the case for rail projects in the United States. In Portland, mass transit usage was higher in the 1970's than it is today with rail, per a widely available Cato study.

Unlike in other places of the world, where economic growth is assumed, and visionary transportation systems are being built, in the United States architects design based on the past. For more about the rest of the world, see New York Times Magazine, June 9, 2008, page 72.

At about \$10 billion per year, the FTA grossly underfunds mass transit, as is becoming increasing obvious, with gas prices at \$4 per gallon. However, the current design of the Central Corridor through the University and elsewhere is not an investment that will reap dividends in the future. It is merely an expense that makes us poorer, as we drive by car from Minneapolis to Saint Paul, since that will continue to be the quickest, most economic way to travel.

If the Central Corridor is to be an investment, then the design must increase use of mass transit by an order of magnitude, rather than by a few percent. The Bangkok design and the Kyoto design give that potential.

## Safety at Snelling and University



The photo shows tow trucks, dented vehicles and emergency workers on Snelling Avenue north of St. Anthony, following a collision, May 8, 2007, which closed the I-94 bridge.

Snelling Avenue, between University and Concordia, has the highest collision rate in the State of Minnesota.

I write this as the City of St. Paul proposes alternatives for expanding the car capacity of Snelling, as more big boxes are being considered for the neighborhood, and as proposed Ayd Mill Road construction funnels more traffic to Snelling. Whether the proposed changes to Snelling improve or reduce safety has not been documented by the engineers that presented the plans. The community also raises other issues including alternative north/south routes between Dale and 280 to reduce the traffic on Snelling, land use/zoning and transit oriented design toward development per the principles of Urban Strategies.

Safety concerns at Snelling, near I-94 and University include pedestrian safety, transit oriented development, bike paths and bike safety and car safety.

Little attention has been paid to providing for a safe environment for pedestrians. Pedestrian traffic comes from people of all ages who live in the neighborhood or attend churches in the neighborhood, work nearby, go to a nearby college, or shop nearby. Several of Saint Paul's busiest bus routes criss-cross Snelling and University. Consideration of the safety of pedestrians is not apparant, as there is no walking path through Midway Center to connect the bus stop on Snelling to the bus stop on University. Consideration of the safety of pedestrians should be a key aspect in future development of the area.

To highlight the importance of design toward pedestrian safety, consider the task of crossing Snelling at Spruce Tree. Left-turning cars are challenged to see pedestrians behind vehicles at the Spruce Tree and Snelling stop light, so pedestrians are at risk of getting hit. Once a pedestrian gets across toward Midway Center, the pedestrian is in a traffic lane competing with cars, which are weaving into their proper turn lane. Crossing at University might be safer, but left turning vehicles are still an issue. Crossing at Shields, where there is no pedestrian crossing, is actually safest because it is less likely that a car will turn into you, and because it is there rather than at Spruce Tree, that a sidewalk leads to Midway Shopping Center. Nonetheless, right turns from I-

94 to Snelling can make it difficult to get across.

There is no evidence that designers are now considering the needs of pedestrians, as Rainbow expanded in 2006 and took away sidewalk space immediately in front of the building, so pedestrians are now forced to walk on a busy car lane when the narrow sidewalk is crowded. The sidewalk width now matches the neighboring Cub Foods. Wide sidewalks and greenways through Midway Center and the proposed big boxes to the south would greatly enhance its safety and appeal, and the safety and appeal for pedestrians using buses or the proposed light rail station. A pedestrian/bike bridge or pedestrian/bike tunnel should be designed above or below Snelling Avenue and University Avenue as part of the development plans.

Bike paths would be welcomed by the neighborhood, as St. Anthony west of Snelling is designed for bikes. Bike storage areas are currently provided at the St. Anthony and Snelling bus stop. Rainbow recently added a bike rack. Development of St. Anthony to the east of Snelling offers an opportunity to extend this biking area with a new bike path. Pascal offers an opportunity for a bike path and pedestrian crossing over I-94 to the neighborhoods and campuses to the south.

The intersections of I-94 and St. Anthony and I-94 and Concordia have the highest traffic accident rates in the state of Minnesota. Shields, near Snelling, is more often than not covered with glass. Left turns from Spruce Tree or the Midway Shopping Center onto Snelling are dangerous because a lane of traffic can block visibility of the second lane of traffic for those making left turns onto Snelling, and because pedestrian crossings compete with cars for a driver's attention. Car insurance rates for zip code 55104, if unregulated, would be double the metro average. A priority of the neighborhood is corrective action to reduce accident rates to something well below the state high. This corrective action should be a primary aspect of any development plans, such as the proposed big boxes and the proposed Ayd Mill Road extension. Expansion of the Midway Shopping Center requires additional streets in the shopping center area and along St. Anthony to safely handle the additional traffic, additional pedestrians, and bikers.

## Campus Safety, the line should be underground

February 6, 2007, at the Central Corridor Resource Center (CCRC), Bob Baker, Director of Parking and Transportation, presented the light rail plans of the University of Minnesota. Safety is the primary concern with light rail, as he is quoted [here](#). Bob points out that the University of Minnesota has the highest density of pedestrians in the state. To prevent further light rail deaths, the University proposes that rail service through campus be underground.

The same safety issue also applies at the intersection of Snelling Avenue and University Avenue, the neighborhood with the most traffic accidents in the state ([traffic study](#)). However, at a CCRC meeting in January, Mark Fuhrmann, Metro Transit deputy general manager, was adamant that there was no money to put the rail system underground, insisting that the railway will be safe. However, if the intersection is not currently safe, how will adding a railway make it safe? The

argument is about cost, not whether an underground system would be safer.

The St. Paul light rail proposal stands at \$932 million per Fuhrmann. The [Federal Transit Administration](#) (FTA) budget is \$8.9 billion for 2007. The FTA prioritizes with a formula which divides construction cost by estimated ridership. Therefore, Fuhrmann pointed out that extensions to existing lines tend to get the funding, because these extensions are cheapest, because infrastructure cost is less. Because the FTA focus is purely on cost, safety issues are not part of the formula, and the safety at Snelling Avenue and University Avenue is really not his concern.

In Bangkok, you can go up or down a dirty river in a public transit boat for less than a quarter dollar. You will see dilapidated shacks and naked, swimming children. Also, in Bangkok, for a little more money, you can take a state of the art, air conditioned, above street level [sky train](#) that apparently is too expensive for Minnesota, USA.

Certainly, in an era where climate change is [fact](#), America can enact an energy policy to reduce automobile emissions. Certainly, in an era where countries are going to [war over oil](#), America can do something to lessen its dependence on foreign sources. Light rail in the cities of America is a great idea. Light rail should be funded sufficiently so that systems are safe, reliable and comfortable. Certainly, we can afford what Thailand can afford.

I agree with Bob Baker. Put the rail system underground through the University of Minnesota. That is the only way to make it safe. It should be underground at Snelling and University, in downtown St. Paul, and most all of the way.

**Thank you for soliciting these comments.**

David Rasmussen

Expanded on-line version of these comments, with active links:

<http://davetravels.blogspot.com/search/label/central%20corridor>

Comment emailed 7/18/2008

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

The common good is best served by giving the most to those who have the least not the other way around which has been true since Reaganomics. What is good for the common good is good for all. Everyone's true self interest is best served by justice. The more equitable our society, the less crime we have to fear and the more we can all feel safe and part of a community.

Marg Rozycki

Comments about the Supplemental Draft Environmental Impact Statement for the Central Corridor Light Rail project.

*As prepared*

Chairman Bell, Commissioners, members of our community;

*John Stone, an organizer working for MICAH 1805 Con. Way*  
 I am ~~speaking today on behalf of MICAH~~ the Metropolitan Interfaith Council on Affordable Housing. We have been active in Minneapolis and Saint Paul for over twenty years, fighting for a metropolitan area where everyone, without exception, has a safe, decent, and affordable home.

In cities like Saint Paul, land use is much more stable than it is in the suburbs. There's not that much going on to really stir things up. The Central Corridor line – that's stirring things up.

We at MICAH stand for the underlying principle that the development of this line should benefit the neighborhoods it runs through.

We've been having a lot of interesting discussions about the line. One of them was with the folks over at the Minnesota Center for Environmental Advocacy. There are three ways in which the line will impact the area. One is a way to get people from here to there – makes good sense. One is as a way to relieve congestion, although it won't do that too much. The last, and most important, and least addressed, ~~is that it will drive development~~

Now, we deal with housing. You get housing when people build houses or apartments. For them to build, they need land to build upon. So at MICAH, we pay attention to land use. *and land value*

*is location efficiency - that being near a stop is valuable*

Here's what happens – when you invest a lot of money in infrastructure, land values go up. They go up particularly at stations. If you had a map of land values, you'd see that the stations pull up the value of the surrounding land. The rail line is like a mountain range of increased value. And the sun shines brightly on the tops. I see them as peaks of gold in the sun.

One thing we are watching is as these mountains of value get created, that the people who are there don't go tumbling off the sides and end up in the valleys. It would be a disservice to the neighborhoods for the locals to get displaced and this new valuable land to be colonized by outsiders. That's one way to look at gentrification.

The other thing we wonder is, if each station stop is a golden mountain of land value, why do the people between Snelling and Rice get only one mountain per mile? Where are the golden mountains of land value for the people who live around Western and Victoria and Hamline? Why is it that these people, a lot of whom are Asian, African, and African American, get the dark sunless valley instead of the golden mountaintop?

Thank you.

*Env Justice*

114 O'Brien: July 16 2007

I received This Letter  
Concerning the Lept Rail Project.

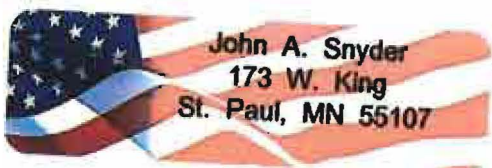
Why such a waste of our  
Taxpayers dollar? The Great  
Big Envelope 10 x 13 inches?

The Cost of Labels and Printing  
Plus Postage.. (which was almost  
Double) You People sure know  
how to waste the Taxpayer  
Dollar. I will never be  
able to use this rail line  
it does not go anywhere  
I want to go. I have no  
reason ~~to~~ go to Mpls. It is  
for the People who live in  
that area. A few years ago  
We had the Street Car.

---

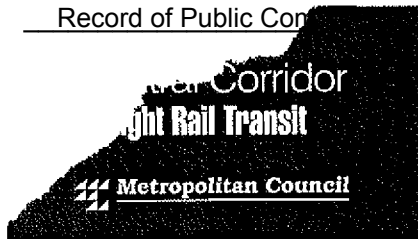
It served the West side  
West St Paul, South St Paul  
to East side Rice Street  
and White Bear & That area

But that was not good  
Enough for the Politicians  
and City Fathers, in came the  
Polluting Bus Line. Now we  
are going Back to the Street  
Car (Light Rail) again. But  
at a greater cost. It Really  
does not serve anyone except  
the Areas it will be traveling.  
So what good is it to waste  
My Tax dollar on Big Letters  
& Envelopes, When just the Regular  
Thing will do!



John A. Snyder





540 Fairview Avenue North, Ste. 200  
Griggs Midway Building, St. Paul, MN 55104

651-602-1940 Phone • 651-602-1920 Fax  
[www.centralcorridor.org](http://www.centralcorridor.org)

## Notice of Publication of Central Corridor Light Rail Transit Project Supplemental Draft Environmental Impact Statement and Public Hearings

The Metropolitan Council, on behalf of the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) as a cooperating agency, is notifying the public of the availability of the Supplemental Draft Environmental Impact Statement (SDEIS) and draft Section 4(f) Evaluation for the proposed construction of transit improvements in the Central Corridor for review and comment.

The SDEIS describes modifications that have been made to the Central Corridor Light Rail Transit (LRT) Project since the publication of the Central Corridor Alternatives Analysis and Draft Environmental Impact Statement (AA/DEIS) in April 2006 (No. 20060147, ERP No. D-FTA-F40434-MN) and the adoption of the Locally Preferred Alternative (LPA) in June 2006. This SDEIS is the latest step in providing a framework for local decision-making as the Central Corridor LRT Project is advanced. Its purpose is to inform the public, resource agencies and local governments of changes proposed to the project since publication of the AA/DEIS in April 2006 and refinements proposed and analyzed during preliminary engineering.

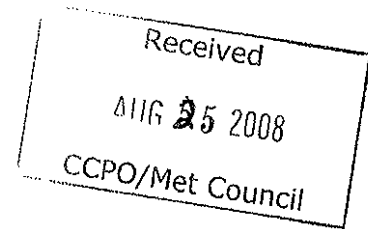
The Central Corridor LRT Project is an approximately 11-mile LRT line that would serve downtown Minneapolis and St. Paul, as well as the University of Minnesota and the state Capitol complex. It will integrate with the Hiawatha LRT in downtown Minneapolis. The project will involve the construction of LRT primarily within existing street rights-of-way and would improve mobility, accessibility and transportation system linkages. The social, economic and environmental impacts of the proposed changes to the LPA have been analyzed in the SDEIS.

A 45-day period has been established for comments on this document. Comments may be submitted in writing or may be made orally at the public hearing(s). Written comments should be submitted directly to Ms. Kathryn O'Brien at the address below by Aug. 25, 2008. Information on the public hearing(s) can also be obtained from Ms. Kathryn O'Brien.

Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave N., Ste. 200  
St. Paul, MN 55104  
(651) 602-1927

The SDEIS and draft Section 4(f) Evaluation are posted on the Central Corridor LRT Project website at [www.metrocouncil.org/transportation/ccorridor/centralcorridor.htm](http://www.metrocouncil.org/transportation/ccorridor/centralcorridor.htm)

**Benita B. Warns**  
**1440 Lafond Avenue**  
**St. Paul, MN 55104-2438**  
**651-641-1037**



August 22, 2008

Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave N., Ste 200  
St. Paul, MN 55104

Ms. O'Brien:

Please enter this letter into the official record for the public hearing on the Central Corridor Light Rail transit Project Supplemental Draft Environmental Impact Statement (SDEIS).

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

In the mid-1980s, University Avenue was a sea of blight. When majority white people fled the area, Asians and African-Americans had opportunities to open businesses in buildings with affordable rents. They poured their hearts and souls into building these family businesses, and many have become successful and profitable. Now they not only serve residents of the surrounding blocks, but many have become destinations for many east metro customers of all racial and cultural groups. The Asians and African-Americans took that blighted area and turned it into a vibrant business district.

LRT will have a negative impact on these business owners in three ways. First, the construction phase will make it difficult for customers to get to the businesses, and, without the needed customer counts, some will not survive. Second, these businesses will lose their on-street parking to LRT. If customers no longer can conveniently park close to these businesses, the customers will go elsewhere, forcing more businesses to go under. Third, LRT won't have stops close to many of these businesses, and the remaining bus service frequency will be cut. The people who ride LRT won't want to get off LRT and transfer to a bus just to get to a business, and the bus won't come as often

for the people who would take it to get to the businesses. Result? Both drastic reductions in customer counts and drastic reductions in business income will cause these businesses to fail. We cannot afford to lose viable businesses in the City, especially if they are doing well now and their failure is directly attributable to LRT. What will be left? Will it be empty storefronts, boarded up buildings, or other signs of economic disinvestment?

LRT will also have a negative impact on the communities of color who live adjacent to the line. Census tract data show very clearly that, even in neighborhoods with overall white majorities, those blocks that are adjacent to University Avenue mostly have non-white majority populations. During construction, the people living on these blocks will have to put up with all the noise, traffic disruptions, and extra cars using their streets both for parking and as a detour around the construction. After construction completion, their streets will become the parking lots for the suburban commuters who won't (due to rail bias) ride the so-called feeder buses, but will drive in, park their cars, and ride the train. The low-income residents will have to pay out of their own pockets the cost to adopt permit parking if they ever hope to park near their houses again. Yet if permit parking is adopted, customers for nearby businesses who were forced off University Avenue by LRT won't have anywhere to park, so they will take their business elsewhere.

LRT will bring disinvestment to the areas adjacent to University Avenue that are not located within a block of a station due to the failure of once-successful businesses when they lose their parking. Even near stations, the housing that is proposed will not serve families with children because all of it is 2-bedroom or less, and the units do not come with parking places, limiting the kind of person who would choose to live there. With failing businesses all around and no place to park the car, people would only choose to live there if don't have other options.

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

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



Benita Warns

24 August 2008

Ms. Kathryn O'Brien  
Central Corridor LRT Project Office  
540 Fairview Ave N, Ste. 200  
Saint Paul, MN 55104

Dear Ms. O'Brien,

I am writing to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for Central Corridor LRT.

I regularly ride the current bus service in Saint Paul. I also have ridden LRT in a number of other cities, including San Diego, Denver, and Portland. I am on the board of the D 13 Community Council and am the representative from the Council to the Central Corridor Community Advisory Committee. The comments I offer in this letter are mine alone; I am not commenting on behalf of the D 13 Council.

I strongly support the proposal to build Light Rail Transit on the Central Corridor for several reasons.

- 1.) LRT will provide much better transit service to the current riders of the number 16 and 50 buses in the corridor.
- 2.) More new riders will be attracted to LRT than to the bus, which should reduce the amount of driving in the corridor.
- 3.) Building LRT will promote and support development that is friendlier to pedestrians and requires much less parking than does current automobile-oriented development.

My understanding is that the budget for the Central Corridor must be reduced or contained in order for it to be financially viable under current conditions. I was encouraged to hear the quote from Commissioner Ortega on MPR earlier this year that he does not want to lose Central Corridor LRT and so is willing to wait on taking the LRT to the concourse at the Depot. Below are comments on various aspects of the project, most if not all of which are addressed in the SDEIS.

---

**A.) At-grade option on Washington Ave.**

I support the at-grade option on Washington Ave. for the alignment through the East Bank of the University of Minnesota. The cost of a tunnel under University Avenue is very high. Without the estimated savings of \$148 million represented by the at-grade option, I do not see how the cost of the project can be reduced to a level even close to the \$840 million maximum budget.

As I understand it, one of the concerns of the University of Minnesota is that running Light Rail Transit (LRT) at grade on Washington Ave. through the East Bank campus will cause automobile traffic congestion. My concern is that consideration of this situation may depend too heavily on analysis by traffic engineers. These engineers use complex computer models to predict future traffic. If one wants to know how build to build a road to accommodate maximum levels of automobile traffic, then this is the way to go.

On the other hand, if one wants to know what might happen if routes are changed or road capacity is reduced, then traffic engineers and their computer models may not be helpful. The engineers tend to over-estimate future traffic volumes and congestion. They tend to underestimate and minimize the potential for automobile traffic to decrease or find other routes. I hope that the University will not rely too heavily on analyses by traffic engineers as you consider the possibility of LRT at grade on Washington Ave. through the East Bank campus.

Greater reliance on transit has the potential to reduce the amount of auto traffic coming to and going from the campus. This in turn has the potential to reduce the demand for parking, which would help counter the current proliferation of looming parking structures and bleak surface lots. These seriously undermine the livability and appeal of the E Bank campus.

On Washington Av in the heart of the E bank campus, LRT has the potential to transform the environment from its current somewhat gritty and traffic-choked condition to a more pedestrian friendly place that would be attractive to both University people and visitors. To

---

the extent that it reduces the need for buses, LRT has the potential to reduce diesel emissions and noise on campus.

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

For these reasons, I support the at-grade alignment through the East Bank of the University.

#### **B.) Alignment in downtown Saint Paul**

I support the DEIS with a diagonal alignment across the block bounded by Cedar, Fourth, Minnesota, and Fifth in downtown Saint Paul. I do not think that concerns about skyways should be an impediment to this alternative. The City can deal with any necessary work related to the skyway system. In my view, the benefits of this alignment outweigh any costs to the skyway system.

I support consolidation of stations in downtown Saint Paul.

I am concerned about the alignment on University Avenue on the north side of the Capitol and on Robert St for several reasons. There is a significant grade between the height of land north of the Capitol and I-94. How much trouble will this cause for the train when it is coming up the hill and negotiating a sharp turn from Robert onto W-bound University Avenue, especially under snowy or icy conditions? In addition, elsewhere in this segment there are a number of additional sharp turns, which create noise and I believe accelerate wear on the wheels.

#### **C.) Three-car platforms**

I support design and construction of three-car platforms at all stations. I also support other necessary provisions to allow operation of three-car trains. At the same time, as a rider, I think that high frequency of trains, which might be achieved with two-car consists, is very important because this means shorter waits for riders. This in turn will promote and support maximum ridership, i.e. use of the service.

**D.) Additional stations on E end of University Av.**

To the extent that adding one or more stations between Snelling and Rice streets may jeopardize the viability of the LRT project, particularly obtaining federal funding, I do not support adding any of them.

**E.) Facilities for storage and maintenance of LRVs**

I support meeting all reasonable needs for facilities for storage and maintenance of LRVs and other equipment.

**F.) Safety for pedestrians, bicyclists, and drivers.**

It seems to me that the problem is car and truck traffic, especially when going too fast or disregarding traffic signals, pedestrians, etc. To improve safety along the Central Corridor, I ask that the following be considered:

Reduce the speed limit

Enforce the speed limit – including using photo enforcement

Enforce traffic signals, especially running red lights - using photo enforcement

**G.) Parking along University Ave.**

There is no doubt that there are some areas along University Avenue where free on-street parking is limited and very important to small businesses. I share the concern expressed by some people about retaining small businesses on University Avenue. Do we know how many businesses might be affected by a reduction in the amount of free on-street parking?

Nevertheless, the areas where free on-street parking is limited and very important to small businesses are limited in extent. An analysis by Steve Morris and Joel Spoonheim (2002) showed that the average usage of on-street spaces was 403 of a total of 1,495 spaces.

They estimated a demand of 569 of the 1,495 spaces. These rates of usage leave from 62 to 73% of the on-street spaces on the avenue vacant. So, rather than having a problem that is widespread and severe, it appears that it is more likely to be an issue in limited parts of the avenue. According to the presentation at the meeting of the Central Corridor Community Advisory Committee on 21 August 2008, current information indicates that there are four "critical areas" in relation to on-street parking in the corridor. This number is less than the nine critical areas under consideration in June 2008, which is less than the 15 critical areas under consideration in March 2008. I ask that the Central Corridor Project Office provide estimates of the number of parking spaces that may be lost in the critical areas with the establishment of LRT in the corridor, estimates of the number of off-street parking spaces in the critical areas, estimates of the current rates at which both on-street and off-street parking spaces are being utilized in the critical areas, and estimates of the future rates at which both on-street and off-street parking spaces may be utilized in the critical areas after they have LRT service. Estimation of future demand ought to include an assessment of potential reductions due to the addition of LRT and other alternatives to driving.

I believe that the City and the Central Corridor LRT project office are working to identify such areas and evaluate opportunities to address the concerns there. I think we ought to wait for the results of the evaluation and then lay out a course of action.

It has been suggested by some people that the Draft Environmental Impact Statement (DEIS) stated that a justification for the LRT project is to relieve a perceived shortage of parking. I reviewed Section S.2 on "Purpose and Need" [p. S-4] and under "Goal # 1: Economic Opportunity and Investment," found two objectives. The second one reads: "Promote a reliable transit system that allows an efficient, effective land use development pattern in major activity centers which minimizes parking demand ..." (emphasis added).

I ask that the analysis of availability of parking along University Avenue include substantial and serious consideration of the abundant off-street parking in the corridor. According to a current study by the City of Saint Paul, there are well over 20,000 off-street parking spaces in the Central Corridor. In off-street parking lots along University Avenue, 40-60% of the spaces were empty during periods of peak demand according to a previous study by Councilmember Stark (2006) when he worked for the Midway Transportation Management Organization (MTMO). The MTMO was a project of University UNITED.



Applying a vacancy rate of 40% to the 20,000 off-street spaces in the corridor, one might expect there to be 8,000 available spaces along University Avenue. This is eight times the number of on-street spaces that might be eliminated when LRT is built.

Lastly, if the City of Saint Paul wants to add parking capacity along the corridor to replace parking that may be lost due to building LRT on University Avenue, then I think that the city itself or some other entity other than the Central Corridor LRT Project should pay for such parking. The Met Council is proposing to invest \$900 million in vastly improved transit service in Saint Paul. Further, the funding to build the project is coming from the Federal government, the state of Minnesota, Ramsey County, and Hennepin County. It does not seem reasonable to me to expect or ask these units of government to fund the replacement or addition of parking along University Avenue. As far as I know, the City of Saint Paul spends little or nothing on public transit. So we should be grateful for the proposed investment in transit, not trying to add on costs for parking.

#### Reports cited

Morris, S., and J. Spoonheim. 2002. University Avenue parking inventory: Analysis of potential impacts of LRT/BRT on on-street parking. Hand-out dated March. Ramsey County Rail Authority and Department of Planning and Economic Development, City of Saint Paul, 25 W. Fourth St., Saint Paul, MN 55102.

Stark, R., C. Hiniker, and J. Rogers. 2006. Parking supply, demand, and requirements on University Avenue in St. Paul. Report by the Midway Transportation Management Organization, 1954 University Avenue, Suite 1, St. Paul, MN 55104.

#### **H.) Signal preemption for LRVs**

I ask that the project consider establishment of a system for preemption of traffic signals, i.e., red lights that delay Light Rail Vehicles so that the train trip in the corridor will be quicker than it might be without signal preemption.

Thank you for considering these comments. I am submitting these comments on my own as a citizen of Saint Paul, though I also am a member of the board of the Union Park District Council and represent that group on the Central Corridor Community Advisory Committee.

Sincerely,

Chip Welling

2157 Roblyn Av.

Saint Paul, MN 55104

**Comments from Agencies and  
other Public Entities**

**DEPARTMENT OF THE ARMY**

St. Paul District Corps of Engineers  
190 Fifth Street East  
St. Paul, Minnesota 55101-1683

REPLY TO  
ATTENTION OF  
Operations  
Regulatory (2008- 03707-TJF)

August 5, 2008

Ms. Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North, Suite 200  
St. Paul, Minnesota 55104

Dear Ms. O'Brien:

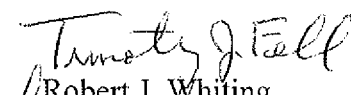
This is in response to the Supplemental Draft Environmental Impact Statement (SDEIS) that was provided to our office regarding the Central Corridor Light Rail Transit Project.

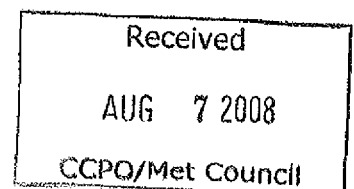
The document correctly indicates that the US Army Corps of Engineers (COE) has regulatory jurisdiction over most waters and wetlands under Section 404 of the Clean Water Act and over work in navigable waters under Section 10 of the Rivers and Harbors Act of 1899.

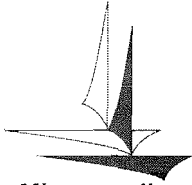
It is our understanding that no waters or wetlands have been identified along the route of the project, which is basically a developed urban area. If construction of the project would not require the discharge of dredged or fill material into any waters of the United States, including wetlands, a Corps Section 404 permit would not be required. If modifications are made to the Washington Avenue bridge which crosses the Mississippi River, the project proposer must contact the US Coast Guard because it has regulatory jurisdiction over bridges that span navigable waters. To address future water quality issues, if the project would involve the construction or reconstruction of outfall structures and storm water management structures that would involve work in the river or adjacent wetlands our office should be contacted. Modification work to these types of structures is typically authorized by existing COE General Permits.

If you have any questions, contact Mr. Tim Fell at (651) 290-5360. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely,

  
Robert J. Whiting  
Chief, Regulatory Branch





**Minneapolis**  
City of Lakes

**Department of  
Public Works**

Steven A. Kotke, P.E.  
City Engineer  
Director

350 South 5th Street - Room 203  
Minneapolis MN 55415

Office 612 673-2352  
Fax 612 673-3565  
TTY 612 673-2157

August 25, 2008

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104  
(via email and US mail)

Re: City of Minneapolis Comments for Central Corridor LRT  
Supplemental Draft Environmental Impact Statement

Dear Ms. O'Brien:

Enclosed with this email are the City of Minneapolis comments on the Central Corridor LRT Supplemental Draft Environmental Impact Statement. The comments are dated August 20, 2008 and were approved by the Minneapolis City Council on August 23, 2008.

We appreciate the opportunity to provide comments on the Supplemental Draft EIS for the Central Corridor LRT project and hope that resolution and incorporation of our comments into the Final EIS will identify and mitigate the impacts of this proposed project on City infrastructure and neighborhoods. If you have any questions, please contact Kelly Moriarity, the City of Minneapolis contact for this project, at [kelly.moriarity@ci.minneapolis.mn.us](mailto:kelly.moriarity@ci.minneapolis.mn.us) or at (612) 673-3617.

Sincerely,

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



**Central Corridor LRT**  
**Supplemental Draft Environmental Impact Statement Comments**  
*August 20, 2008*

**Executive Summary**

- S-2 (Figure S-1) – Map shows transit/ped mall to Oak Street; can be problematic since not clarified that endpoint is up for discussion, and ES is likely to be read by more people than whole plan; also described in text on page S-8
- S-19 (Public Involvement) – Need to update language on county/city public hearings held in June and July

**Chapter 1 – Purpose and Need for the Proposed Action**

- 1-14 – Fairview Hospitals and Clinics should specifically be called out under employment opportunities in the UofM/Prospect Park segment. Augsburg College should also be represented.
- 1-22 – Under 1.4 Planning Context, the list of plans does not include a single plan in Minneapolis. The Central Corridor is addressed in:
  - The Downtown East/North Loop Master Plan (adopted 2003)
  - University Ave SE and 29<sup>th</sup> Ave SE Development Objectives and Design Guidelines (2007)
  - The Cedar Riverside Small Area Plan (adopted 2008)
  - The Minneapolis Plan for Sustainable Growth (comp plan adopted by City 2008)
  - Intermodal Station Siting and Feasibility Study (Hennepin County, 2006)
- 1.3.3 p. 1-23 2030 Transportation Policy Plan – States that the Cedar Avenue and I-35W BRT corridors would connect with the Central Corridor. This connection is indirect, at best. Similar comment for p. 1-25 where it states that the Central Corridor will serve as a distributor for several BRT corridors.
- 1.3.3 – p. 1-24; the map identifies the Bottineau Boulevard Corridor as BRT. An Alternatives Analysis is presently underway so the transit mode is not yet determined. It should be referred to as a Transitway.

**Chapter 2 – Alternatives Considered**

- 2-15 (At-Grade LRT Alignment with Transit/Pedestrian Mall Alternative) – The pedestrian/transit mall is identified as being extended east to Oak St whereas the current plan is to terminate the transit Mall at Walnut. Correct the description of the Transit Mall limits.
- 2-19 (Vehicle Maintenance and Storage Facility) – The SEMI location for the vehicle maintenance and storage facility may not be consistent with the SEMI Master Plan

- 2.2.3 – p. 2-24; Table 2-1 – Include in the table the “location refined” for the West Bank Station.
- 2.3.4; Figure 2-4 – Revised Location of West Bank Station not included on graphic.
- 2-39 (Transportation Effects) – Number of intersections at LOS E & F goes down – this seems to contradict initial traffic studies surrounding Washington Ave transit pedestrian mall; similar table on 10-3. Clarify in this Table the effects to in corridor and out of corridor intersections.

### **Chapter 3 – Social Effects**

- 3-21 – Under 3.1.2.5, land uses and zoning in the West Bank/Cedar Riverside area are not summarized.
- 3-3-21 – Under 3.1.2.6, it is a generalization to say that zoning around the Metrodome allows for light industrial uses. While some of this zoning still exists, the City did a comprehensive rezoning in this area and the rest of downtown to allow for transit-oriented development near the transit stations.
- C3-49 (Cedar-Riverside) – The neighborhood does not have a large concentration of Native American people, though there is a diverse mix of ethnicities and national origins
- 3-49 (Cedar-Riverside) – Tower Hill Park, Luxton Park, and East River Flats are listed as being in Cedar Riverside; these are actually located in other Minneapolis neighborhoods, Prospect Park and University
- 3-50 (Figure 3.2-12) – The area labeled Cedar Riverside Community is incorrect, and should be relabeled Riverside Plaza Apartments
- 3-52 (Downtown West) – Hennepin County Medical Center is not located in this neighborhood, it is in Elliot Park instead (and is correctly listed under that heading)
- 3-83 (Downtown Minneapolis) – Fire Station G is in Cedar Riverside, not downtown
- 3-111 – In Table 3-13, Currie Park is incorrectly identified as being in Downtown – it should be listed under University/Prospect Park.
- 3-111 – In Table 3-13, Gold Medal Park is within 0.5 miles of the Downtown East/Metrodome station and Hiawatha Connection in Minneapolis.
- 3-112 – In Table 3.14, Currie Park is incorrectly identified as being in Downtown – it should be listed under University/Prospect Park.

### **3.4 Cultural Resources:**

- Table 3-9: “Downtown Minneapolis”: Please note that historic resources in the 5<sup>th</sup> Street corridor west of Chicago Avenue were considered in the 106 for the Hiawatha Light Rail line. Any changes to the existing Hiawatha alignment west of Chicago Avenue - as a result of the Central Corridor project - will need to consider those resources.
- Table 3-9: “University/Prospect Park”: Please note that commercial properties adjacent to the line along the east side of Cedar Avenue will need further review and consideration in the 106 as potential historic resources. Note as EU-Eligibility Undetermined.
- Table 3-9: “University/Prospect Park”: Please note that the Cedar Riverside housing complex, close-by the line along the west side of Cedar Avenue is considered a potential historic resource and will need further review and consideration in the 106 process. Note as EU-Eligibility Undetermined and/or NRE National Register Eligible.
- Table 3-9: “University/Prospect Park”: Please note that selected commercial properties adjacent to the line along the south side of Washington Avenue (on the East Bank) will need further review and consideration in the 106 as potential historic resources. Note as EU-Eligibility Undetermined.
- Table 3-9: “University/Prospect Park”: Please note that selected industrial properties adjacent to the line along the north side of Intercampus Transitway (on the East Bank) will need further review and consideration in the 106 as potential historic resources. Note as EU-Eligibility Undetermined.
- Table 3-9: “University/Prospect Park”: Please note that Prospect Park Historic District is under study at the local level and a decision is expected in 2009. The National Register nomination is also under review by SHPO; a decision is expected in late 2008.

## **Chapter 4 – Environmental Effects**

### **4.2 Water Resources**

Although it is correct that “no wetlands or public waters are located within the Central Corridor LRT Study Area”, the entire study area within Minneapolis is served by a storm drain system that DOES drain to a public water, namely the Mississippi River and Bridal Veil Creek which is currently conveyed in a pipe system.

Minneapolis and other older cities developed before there were regulations regarding stormwater quality. Our only opportunities to improve existing conditions are during REDEVELOPMENT or by RETROFITTING.



The quality of lakes and rivers is especially important to the State of Minnesota and the City of Minneapolis. Any time there is a public project, or there is jurisdiction over a private project, the agencies involved should be looking for opportunities to make improvements for the betterment of our water resources.

#### **4.2.1 Legal and Regulatory Context**

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

#### **4.2.1.3 Minnesota Pollution Control Agency**

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

#### **4.2.1.5 Cities of Minneapolis and St. Paul**

Regarding the first paragraph:

For Minneapolis, the first and third sentences of the first paragraph are not accurate.

(The second sentence pertaining to FEMA and floodplains is accurate for Minneapolis.)

For Minneapolis, the following replacement language is an acceptable substitution for the first and third sentences:

Minneapolis regulates water quality through its building plan reviews, its Erosion & Sediment Control Ordinance, and its Stormwater Management Ordinance. An Erosion & Sediment Control Plan is required for projects that disturb in excess of either five thousand (5,000) square feet or five hundred (500) cubic yards of earth moved. A Stormwater Management Plan is required for projects on sites that exceed one acre. It is sometimes the case that the Stormwater Pollution Prevention Plan (SWPPP) prepared for the MPCA for the NPDES General Construction Permit (as described in 4.2.1.3) provides the information applicable to both of the Minneapolis plans described in this section, however there may be additional requirements by the City.

Regarding paragraphs 2, 3 and 4:

No comments.

#### **4.2.1.6 Mississippi Watershed Management Organization and Capitol Region Watershed District**

The third sentence is awkward at best, and possibly incorrect, depending on the intended meaning of the statement, which is unclear: “The MWMO and CRWD are direct tributaries to the Mississippi River.” The MWMO and CRWD are agencies, not bodies of water. Some but not all of the areas within the jurisdictions of the MWMO and CRWD are directly tributary to the Mississippi River.

The fourth and fifth sentences are untrue within the City of Minneapolis. The City of Minneapolis, and not the MWMO, carries out these tasks. These two sentences should be moved to section 4.2.1.5 for at least portion of the project within Minneapolis. (For clarity, it may be preferable to divide “City of Minneapolis” and City of St. Paul” into two separate sections.)

#### **4.2.3 Existing Conditions**

The following language, shown above in reference to section 4.2, could be added to the end of section 4.2.3:

Although it is correct that “no wetlands or public waters are located within the Central Corridor LRT Study Area”, the entire study area within Minneapolis is served by a storm drain system that DOES drain to a public water, namely the Mississippi River and Bridal Veil Creek.

Minneapolis and other older cities developed before there were regulations regarding stormwater quality. Our only opportunities to improve existing conditions are during REDEVELOPMENT or by RETROFITTING.

The quality of lakes and rivers is especially important to the State of Minnesota and the City of Minneapolis. Any time there is a public project, or there is jurisdiction over a private project, the agencies involved should be looking for opportunities to make improvements for the betterment of our water resources.

#### **4.2.4.2 Key Project Elements**

Regarding the statement, “However, the proposed construction activities will take place, for the most part, within existing impervious surfaces.” With the qualifier, “for the most part”, this is undoubtedly a true statement. However, there are several areas within Minneapolis that are not currently impervious that will be impacted. There are opportunities in these areas, to minimize NEW impervious surfaces. There are also opportunities throughout the corridor to remove EXISTING impervious surfaces and replace with pervious materials.

Regarding the statement, “No long-term effects to surface water runoff are anticipated;” For the purposes of the EIS, ‘long-term effects’ is generally understood to mean ‘long-term ADVERSE effects’. It might be noted, however, that in this project there are opportunities for long-term REDUCTIONS and TREATMENT of surface water runoff.

#### **4.2.5 Short-Term Construction Effects**

Regarding the statement, “All storm drainage systems located within the Study Area are designed to accommodate runoff from the existing developed conditions, the following should be added: “. . ., however in Minneapolis the system is at or near capacity and thus rate controls may be required.”

Regarding the following sentence, The City of Minneapolis should be added, as follows:

“The City of St. Paul and the City of Minneapolis may require upgrades to the existing storm sewer system to provide additional treatment for stormwater runoff within the proposed construction limits. It is anticipated . . .”

#### **4.2.6 Mitigation**

The third sentence is poorly constructed.

#### **4.5 Air Quality**

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

### **Chapter 5 – Economic Effects**

- 5-6 (University/Prospect Park) – The draft station area plan referred to – the “University Avenue SE & 29th Ave SE Development Objectives and Design Guidelines” – is no longer a draft. It was adopted by City Council in 2007
- 5-10 (University/Prospect Park) – Need to modify statement “Washington Avenue would be closed to all vehicle traffic” to add “except buses”

### **Chapter 6 – Transportation**

#### **General Comments**

- Signal design and intersection capacity issues. The impacts to the following intersections have not been fully evaluated or disclosed in the DEIS or SDEIS:
  - Huron, University and Washington - complex operation and long clearance time
  - Chicago, 4<sup>th</sup> St, 5<sup>th</sup> St and Portland - complex operation and long clearance time
  - 2<sup>nd</sup> Ave N and 5<sup>th</sup> St - complex operation and long clearance time
  - 11<sup>th</sup> Ave S crossing increased number of trains and operation of interlock between Hiawatha LRT and CCLRT
- No mention of events and the impact on general traffic. Not just Basketball, football and hockey, but Northrop, Radisson, and other “minor events” Add information/analysis on effects on traffic for events to the FEIS.

- Signal pre-emption is not to be used. Address intent to not use signal pre-emption in the FEIS.
- The mitigation construction should precede the construction of the LRT.
- There is no discussion of station impacts on parking in local neighborhoods. There probably will be a need for Critical Parking areas
- 6.1.4.4 – p. 6-8; LRT Station Volumes, Table 6-6-3 – Total daily boardings at the Government Plaza of 780 by 2030 seems very low.
- 6-16, Table 6-5 -- Fourth Street 2006 ADT does not appear to be correct. If it is correct, compare it to the 2005 and 2007 values to determine if this low volume count is unusual.
- 6-16, last paragraph, last sentence -- The conclusion about 2030 volumes being less than 2020 volumes has no correlation to the existing 2001 or the 2006 volumes. Thus the consistency statement is without supporting facts.
- 6-17, Table 6-6 -- The 2030 volume across the Washington Ave Bridge keeps changing. The 2030 build forecast traffic volume has and still is being quoted by the CCPO as about 14,000 now it is 15,100.
- 6-17 Table 6-6 AADT for segment of Washington proposed to be closed is critical information to disclose. Fill in values where the table says Not Available.
- 6.2.3 Long Term Effects (Traffic) – Include in the traffic analysis for the FEIS a study of the impacts of a complete Granary Road on the traffic network. Implementation of Granary Road may help to alleviate some of the mitigation components resulting from the Washington Avenue Transit Mall.
- 6-18, 1<sup>st</sup> full paragraph – The SDEIS declares the LOS will improve on the bridge but they have not disclosed the data or analyses stating what the LOS would be on the bridge with Wash Ave closure. Lower volume does not necessarily equal LOS improvements if you also make other network (lanes, intersections) changes. In both scenarios, with and without Washington Ave closed, we have a lot of traffic being handled differently and thus LOS may be similar or different depending on a number of factors. The analysis behind this statement should be disclosed
- 6-18, 2<sup>nd</sup> full paragraph – SDEIS states the new LRT gate near Cedar Ave would be closed every 7.5 minutes. This is only true for one LRT direction or if both directional trains would meet exactly at the same time every time. Thus this impact analysis needs to account for that the two directional trains will not meet, so the headways related to the gate should be 3.75 minutes.
- 6-18, U of M Alignment, 1<sup>st</sup> paragraph – Other transit buses besides Metro Transit

and U of M will most likely use the transit mall.

- 6-18, Describe in more detail how the emergency vehicle access would be maintained.
- The SDEIS is silent on bikes on the transit mall. Address current and proposed conditions for bikes on the mall.
- 6-18 Indicate what the confidence level is for the data from the traffic studies (high-medium-low) based on available data and limitations on various methodology (ex: were pedestrians accounted for? The regional model is unconstrained) Describe what work remains to be done.
- 6-19, 1<sup>st</sup> and subsequent paragraphs: The project is projected to open in 2014. The SDEIS traffic forecast modeling was changed from 2020 to 2030. The typical EIS approach for traffic impacts is to look at 2 forecast scenarios to understand both short AND long-term impacts. The first “short-term” scenario is usually set at 1 year after opening or in this case is 2015. The second “long-term” scenario is to match an approximate 20-year horizon and thus the regional 2030 forecast is most appropriate. Why was there not a 2015 traffic forecast accomplished to understand the “short-term” impacts?
- 6-19, 1<sup>st</sup> and subsequent paragraphs – The 2030 forecast modeling does not account for the correct roadway network that will be in-place in 2015 let alone 2030. The City of Minneapolis has numerous federally funded Non-motorized Transportation Pilot (NTP) Projects that are not included in the planned network. The following projects are within the CCLRT traffic study area and expected to be completed in 2008 and 2009:
  - 10<sup>th</sup> Avenue SE (Como Ave SE to Univ Ave SE) converted from 4 lanes to 3 lanes with bike lanes
  - 19<sup>th</sup> Avenue S (Univ Ave SE across the 10<sup>th</sup> Ave river bridge to Riverside Ave) converted from 4 lanes to 3 lanes with bike lanes, also includes a portion of 19<sup>th</sup> Ave S south of Riverside Ave
  - 27<sup>th</sup> Avenue SE (Univ Ave SE to E River Pkwy) most portions converted from 4 lanes to 3 lanes with bike lanes
  - Franklin Avenue E (from Riverside Ave east/northeast across the Franklin Ave river bridge to E River Pkwy) converts 4 lanes to 3 lanes with bike lanes
  - 20<sup>th</sup>/Minnehaha Avenues S (Riverside Ave to 26<sup>th</sup> Ave S) converted from 4 lanes to 3 lanes with bike lanes
  - Riverside Avenue (Cedar to Franklin Ave) converted from 4 lanes to 3 lanes with bike lanes, also includes portions of 4<sup>th</sup> St S and 15<sup>th</sup> Ave S westerly of Cedar

These projects should be included in both the 2015 and 2030 modeled forecasts and a

reassessment of the 48 intersections should be accomplished appropriately.

- 6-19, 1<sup>st</sup> and subsequent paragraphs – This text states that only 4 intersections in 2030 are impacted by the project because the 2030 no-build scenario has 6 other intersections that will have reached LOS F. By only selecting to examine the 2030 scenario and not the 2015 “short-term” scenario, the project could be causing other impacts that are being masked by the 2030 background traffic growth.
- 6-19, The amount of delay is likely to increase at the 6 intersections identified, but was not fully analyzed. Also, the unacceptable LOS conditions will likely occur sooner with the implementation of the Central Corridor LRT project than they would have otherwise. There are grades of LOS F and it frequently happens where one leg of an intersection operates with large delay, with minor volumes and the major approach operates at a higher level of service and the total for the intersection is a LOS higher than F. How is amount of delay and delay on individual intersection legs addressed?
- 6-19, bulleted intersections – 2<sup>nd</sup> bullet -- Is this the Cedar/Wash/15<sup>th</sup> Ave intersection? Last bullet – Do you mean 4<sup>th</sup> St SE/10<sup>th</sup> Ave SE?
- 6-19 A much more detailed description of the affects to the traffic and travel patterns that result from the closure of Washington is needed. Including, but not limited to, the anticipated traffic volume increases on the roadway segments and freeways within the study area. The current section only talks about intersection operations everywhere except on the River Road.
- 6-19, The operation of Harvard from the ERR to Washington will be dramatically changed by the addition of substantial traffic volumes. The conflict between heavy pedestrian traffic and much heavier vehicular traffic will be difficult to manage in a safe and efficient manner. How will this be mitigated?
- 6-19, last paragraph – While the conversion may improve traffic flow operations, local access and circulation will be reduced. Also, this paragraph is confusing because the conclusion is stated before the fact statements.
- 6-19, The capacity of Washington from Huron to Walnut will be dramatically reduced. It will be one lane with no turn lanes, including the prohibition of EB left turns from Oak to University. How will the project address this?
- 6-19, This discussion states that traffic conditions on Washington would improve. What is the basis for this conclusion and which alternative is this in comparison to? With one lane of traffic and no turn lanes from Oak to either Walnut or Harvard, and the prohibition of EB left turns along Washington from Oak to University the delays to traffic could be long and unpredictable. A more detailed description of these impacts is needed.

- 6-19 (University of Minnesota Alignment) – It seems strange to say the transit/pedestrian mall will improve traffic on Washington. It will by eliminating auto traffic, but traffic at the intersections on side streets will likely not improve, as much of the traffic will not be eliminated but merely transferred to nearby streets.
- 6-19 The transit mall has no “natural” detour route. A detour traffic management plan should be developed to understand how buses, emergency vehicles, bikes and pedestrians will move when Washington is closed for maintenance, construction or emergencies.
- 6-20, The delays mentioned in Table 6-8 appear not to include train clearance interval, which could be as long as 45 seconds in which no vehicles can move. The impacts to the fire station and response time are not mentioned.
- 6-20, Table 6-8, last row for Church St – Why is there a LOS A, 1.5 sec delay stated for 2030 when this intersection is proposed for pedestrians only and/or provides local driveway access? Were their other assumptions related to public traffic volumes?
- 6-20, 1<sup>st</sup> paragraph – The last sentence reference to 4<sup>th</sup> St SE is confusing.
- 6-20, Section is about long-term effects of the Key elements and there is no discussion about access to businesses. Add discussion of those impacts.
- 6-22, For three-car train operation, what’s the definition of minor impact – additional delay? Do we know this to be the case especially in the downtown areas with shorter block lengths and Dual Train operation in Minneapolis? Substantiate the statement about minor impacts to traffic operations for the introduction of three car trains. Traffic modeling of this situation has not occurred as far as the City is aware.
- 6-22, The Washington Ave bridge roadway widths have not been resolved. The proposal to have a 16 ft traffic lane does not adequately address the operation with a breakdown or closure of the one moving lane. Especially if the lane has a barrier on both sides.
- 6-23 Mitigation - Diversion impacts are not discussed in enough detail to guide decision-making. Adding turn lanes to improve operation is too broad a statement. Generally to obtain a turn lane, either the roadway must be widened – loss of sidewalk area; or removal of parking - difficult in commercial districts.
- 6-24, Section 6.3.1.2 – note the above page 6-19 comments related to the NTP bike projects. Will the CCLRT project remove any of these bike projects? If so, where will the comparable bike facilities be relocated?
- 6-24, Section 6.3.2 Access Minneapolis – References were made to the Downtown

Plan. Please also note the draft Citywide Plan:

<http://www.ci.minneapolis.mn.us/public-works/trans-plan/> This draft Citywide Plan is currently being updated and CCLRT should consult with Minneapolis for pending changes. The Citywide Plan is anticipated to be adopted this year.

- 6-25, Parking will be removed the entire length of Washington Avenue and much of University Avenue with no suggestion of how this might be replaced. There will be no loading and unloading of passengers or freight the entire length of Washington. How will loading be addressed for affected properties?
- 6-26, 6.3.2.2 Existing Bicycle Environment – Downtown Minneapolis – Identifies Marquette and 2<sup>nd</sup> Avenues as having dedicated bicycle lanes, this will not be true after implementation of the Access Minneapolis/UPA recommendation.

#### **Chapter 7 – Section 4(f) Evaluation**

- It is unclear how the traffic and their associated impacts will be assessed and determined related to the 4(f) river park and parkway resources. These impacts should be disclosed with the DEIS so that they can be addressed, understood, and resolved sooner. How will these impacts be disclosed and what will be the opportunity for community/agency input on these impacts?

#### **Chapter 9 – Indirect and Cumulative Impacts**

- 9-5 Reasonably Foreseeable future actions - Include in City-Mpls actions: An Urban Partnership Agreement (UPA) Project includes funding for reconstruction including dual bus lane operations along 2nd and Marquette Avenues in Downtown Minneapolis to be completed by the end of 2009. Both of these avenues intersect with 5th St LRT operations.
- 9.2.5 – 9-7; Table 9-2 – Under Granary Road Development it states “Granary Road is planned to cut through to St Anthony Parkway South.” Not sure where St Anthony Parkway south is, if it exists. Any extension of Granary road beyond Minneapolis would need to be initiated by the City of St Paul.
- 9.2.5 – p.9-8; Table 9-2 – Under East River Parkway extension – It states that the “East Bank connection to Bridge 9 will be addressed by the U of M...” This statement is unclear. There is a City-led project to extend the bike trail on Bridge 9 East to Dinkytown.

#### **Chapter 10 – Evaluation of Alternatives**

- Ch. 10 - 10-5 (Issues to be Resolved) - Municipal consent process already initiated

#### **Chapter 11 – Public Agency Coordination and Comments**

- 11.2.3: Please note that Minneapolis HPC/CPED-Preservation and Design team is also an interested party who will continue to work in the 106 process with MnDOT and SHPO.



City of Saint Paul Review of

**Supplemental Draft Environmental Impact  
Statement for  
Central Corridor Light Rail Transit Project**

July, 2008

## **I. Summary of Recommendations**

The following are a listing of recommendations from the following report. They are more fully explained in the body of the report

- **The City recommends the inclusion of the three infill stations as part of the initial construction of the Central Corridor LRT project. Further, if fewer than all three are funded as part of the initial construction, the City should have a central role in choosing priorities. Finally, the City will press for construction of any remaining of the three stations as quickly after the initial completion of the project.**
- **The City concurs with the relocation of the Rice Street Station to the new site and configuration.**
- **The City concurs with the rerouting of LRT along Robert Street to 12<sup>th</sup> Street, and the location of the Capitol East LRT station.**
- **The City fully supports the rerouting of the LRT, and location of the station, through the Athletic Club block.**
- **The City prefers the Wacouta Mid-Block alternative, both from an LRT operations perspective as well as from a land use impact perspective.**
- **The City understands and accepts the requirement that such TPSs be located approximately every mile, and within 500' of the LRT alignment. The City needs to be intimately involved in the location, design and landscaping of these 9 TPSs.**
- **The City supports the construction of three-car platforms as part of the initial construction.**
- **The City supports use of the Conseco site for the Vehicle Maintenance and Storage Facility.**
- **The assessments and mitigation plans for the future infill stations appear complete and are acceptable to the City.**
- **The assessment and mitigation plans for the Capitol Area Alignment and Stations appear complete and are acceptable to the City.**
- **Construction impacts on current skyway connections in the Athletic Club block must be included in the mitigation text, as well as a plan for mitigating such**

disruption, either through a temporary structure to support the existing connection, or construction of a temporary, heated skyway connection.

- Except as cited above regarding the Athletic Club block skyway, the assessment and mitigation plans for the Downtown St. Paul Alignment/Station Modifications appear complete and are acceptable to the City.
- **The City recommends that Preliminary Engineering include resilient fasteners to mitigate noise, vibration, and electromagnetic interference potentially caused by light rail transit on Cedar Street past two historic properties (Central Presbyterian Church & Church of Saint Louis) and Minnesota Public Radio.**
- The City recommends that mitigation for the TPSs include avoidance of sites fronting on University Avenue or major cross streets, such as Raymond Avenue. Further, location of TPSs in downtown will require particular sensitivity with respect to opportunity costs – finding sites/locations that are not attractive for “higher and better uses.”
- The City believes that greater specificity is needed as to the criteria for designing and landscaping the TPSs. First, there should be at least a menu for possible cladding materials for such facilities. Second, there should be standards set for landscaping techniques. Third, especially for downtown and the Raymond area, possibilities of such facilities being incorporated into existing or future larger buildings should be explored.
- Except for the comments above relating to the siting, designing and landscaping, the assessment and mitigation plans for the Traction Power Substations appear complete and acceptable to the City.
- The City recommends ~~that the following elements be considered in~~ development of a mitigation program for the loss of on-street parking, whereby, the City and Metropolitan Council staff ~~will~~ work with affected property owners and tenants to maximize parking on and near University Avenue. And that the City and Metropolitan Council staff ~~will~~ work together over the next two months to estimate costs and apportion them between the City and the project in an equitable manner. ~~The elements include:~~ **Elements of this program should include:**
  - a. Management system for on-street parking including installing parking meters on side streets in the station areas;
  - b. Installing new meters along University Avenue where parking remains;

- c. **Developing comprehensive signage for all on- and off-street public parking facilities, including time limit parking for one block either side of University Avenue on all secondary cross streets;**
  - d. **Developing shared public, off-street parking lots (generally by reuse of existing inefficient off-street parking);**
  - e. **Developing corridor-wide permit parking; and**
  - f. **Considering off-peak parking on University Avenue.**
- 
- **The City recommends that the visual impacts be incorporated into the streetscape, station design and public art work being done within the Preliminary Engineering phase and encourages active community engagement, including working with Public Art Saint Paul.**
  - **Except for the comments above relating to parking and visual impacts, the assessment and mitigation plans for the Three-Car Platforms appear complete and are acceptable to the City.**
  - **The City supports the coordination among the City, Metropolitan Council and Metropolitan Airports Commission as potential zoning code amendments are being considered and drafted.**
  - **The City recommends that a brief discussion on the alternative sites for the Vehicle Maintenance and Storage Facility be included in the SDEIS, with a statement of rationale as to why the preferred site was chosen.**
  - **The City recommends that more analysis be done on the quality and timing of noise generated by the Vehicle and Maintenance Facility, particularly any noise ‘spiking’ with LRT vehicle operations and during nighttime hours.**
  - **Except for the comments above relating to zoning code amendments, the rationale for site selection and focused noise impacts, the assessment and mitigation plans for the Vehicle Maintenance and Storage Facility appear complete and are acceptable to the City.**
  - **The City recommends ~~reinstatement of the~~ maintaining current Route 16 service in ~~the peak and non-peak hours~~ to existing levels.**
  - **The City recommends enhanced at least 15-minute peak-hour service (15-minute frequency or better) on Rice, Dale, Lexington, Snelling, and Fairview/Raymond as part of the overall LRT project.**

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

## II. Purpose of the Supplemental Draft Environmental Impact Statement (SDEIS)

The purpose of the SDEIS is to evaluate the environmental impacts of project elements altered or added since the Draft Environmental Impact Statement (DEIS) for Central Corridor LRT was issued in 2006. At that time, the City of Saint Paul adopted a detailed review of the project and its impact on the city. Those comments (adopted in June, 2006) are included in this review by reference and attached.

According to the analysis done by the Metropolitan Council (the project proposer) there are 9 project elements that are of sufficient significance to warrant full environmental analysis in this SDEIS process. Their descriptions are as follows:

- 1. Hiawatha/Central Corridor LRT Connection:** The SDEIS evaluates an engineering modification to optimize the connection of the Central Corridor LRT to the existing Hiawatha LRT in downtown Minneapolis, west of the proposed West Bank Station. The modification being proposed would cross eastbound Washington Avenue with a new signal, then rise to cross I-35W on an aerial structure and connect to Hiawatha on the existing bridge structure with cross-overs to provide full bidirectional movements. This option provides a storage track for special operations and to accommodate special events operations at local venues and sports arenas.
- 2. University of Minnesota Alignment:** The SDEIS evaluates an at-grade LRT alignment on Washington Avenue running from approximately the Washington Avenue Bridge to Oak Street, which would function as an At-Grade Transit/Pedestrian Mall. This alternative would change the operation of this segment by excluding automobile traffic. Enhancements would be made to pedestrian and other transit facilities operating in this segment. Emergency vehicle access would be maintained. The Stadium Village Station would be located at the proposed U of M multi-modal center. The East Bank Station would be located on Washington Avenue at Union Street.
- 3. Future Infill Stations:** The SDEIS evaluates three future infill stations at Hamline Avenue, Victoria Street, and Western Avenue. The new stations respond to concerns of residents and stakeholders, including the City of St. Paul and Ramsey County, to increase access to the neighborhoods and businesses. The locations of these stations would reduce the station spacing from approximately one mile to half a mile along University Avenue in this portion of the Study Area. The SDEIS will evaluate implementation of each of these stations; however, the project as proposed would only include below-grade infrastructure to allow for station construction at a future date.
- 4. Capitol Area Alignment and Stations:** The SDEIS evaluates engineering modifications to the alignment along University Avenue and Robert Street directly adjacent to the Capitol Area. This evaluation of modifications to the AA/DEIS LPA is necessary to accommodate several new Capitol Area structures and grade constraints along University

Avenue. The station at Rice Street has been modified to respond to roadway geometry and concerns about access and optimized bus connections.

- 5. Downtown St. Paul Alignment/Station Modifications:** The SDEIS evaluates and discloses two alignment alternatives that would extend the alignment disclosed in the AA/DEIS beyond the St. Paul Union Depot Headhouse. Both alignments would provide the opportunity for future connections to the St. Paul Union Depot concourse level where a multi-modal terminal is being planned. The two alignment options considered for this connection include the Wacouta Mid-Block and Broadway extensions. Either of these alternatives would be constructed to include a new connection to the maintenance and storage facility. Both alignments include a potential extension to the concourse level of the Union Depot in the future. The SDEIS also evaluates an alternative alignment and station option that would travel south on Cedar Street to a point south of 5th Street, where it then would turn southeast onto the 4th/Cedar Street block. The alignment would continue diagonally across the block, emerging onto 4th Street at Minnesota Street. This alignment consolidates two AA/DEIS stations (6th Street and 4th Street) into one station on the diagonal through the block.
- 6. Traction Power Substations:** The SDEIS evaluates and discloses the number and general location of substations required for operation of the Central Corridor LRT.
- 7. Three-Car Platforms (Train Requirement):** The SDEIS evaluates and discloses the characteristics of three-car train operations and the physical impacts of constructing 3-car platforms. The AA/DEIS disclosed an operating plan that includes 2-car train consists and platforms. This change responds to identified capacity and demand issues.
- 8. Vehicle Maintenance and Storage Facility:** The SDEIS evaluates and discloses the proposed location of a vehicle maintenance and storage facility in downtown St. Paul.
- 9. Washington Avenue Bridge:** The SDEIS evaluates and discloses the proposed modifications to the Washington Avenue Bridge to accommodate operation of the Central Corridor LRT on the existing structure. Table S1 provides a description of the physical and operating characteristics of the AA/DEIS LPA and the proposed changes to the AA/DEIS LPA.

The SDEIS analyzes each of these 9 project elements through the standard series of environmental considerations. The SDEIS analysis is limited only to these 9 issue areas and does not reiterate previous analyses. Although the SDEIS does repeat much of the background data found in the original DEIS and other previous documentation of the project.

### III. Scope of City Review

The Central Corridor LRT project is as complex and far-reaching a public works project as the City has seen in decades. And the City has been extensively involved in most of the project's deliberations since first conceived in the late 1960s. However, *this current review is limited only to the major changes listed in the SDEIS* – not other aspects of the project with which the City may differ or disagree.

This review is organized around two central questions with respect to the major changes:

- **Does the City agree with the changes being proposed?** Overall, is each of the changes appropriate? Are they complete? Are they acceptable in their details?
- **Are the impacts and mitigation actions listed for each change accurate and complete?** Does the City have any specific recommendations for mitigation not included in the SDEIS?

A final note about the scope of the City's review: the City is not the project proposer nor the SDEIS author, but rather a responder to the SDEIS. The City did not hold a separate public hearing from the three held by the Metropolitan Council. *Therefore, this response does not represent the totality of comments from the community and individuals in Saint Paul with respect to the SDEIS.* Rather, these are responses from the City as one of the project partners, along with Minneapolis, Hennepin and Ramsey County and the University of Minnesota.



## IV. Does the City agree with the changes being proposed?

Although the following project elements are significant for the success of the overall project, the City is not commenting on them because they are outside the scope of the City's influence:

### 1. Hiawatha/Central Corridor LRT Connection

### 2. University of Minnesota Alignment

### 9. Washington Avenue Bridge

3. **Future Infill Stations:** The City agrees with, and fully endorses the addition of stations at Hamline, Victoria and Western. The City continues to support the inclusion of these three stations in the initial construction of the project. However, the City recognizes the decision made by the Metropolitan Council in February, 2008 that the project may only be able to afford one of the infill stations in the initial construction of the LRT project.

**The City recommends the inclusion of the three infill stations as part of the initial construction of the Central Corridor LRT project. Further, if fewer than all three are funded as part of the initial construction, the City should have a central role in choosing priorities. Finally, the City will press for construction of any remaining of the three stations as quickly after the initial completion of the project.**

4. **Capitol Area Alignment and Stations:** Proposed changes to the alignment and station location at Rice appear reasonable and respond to analysis subsequent to the completion of the DEIS in 2006. The station location east of Rice Street allows for a more generous station platform area than can be accommodated totally within the current right-of-way west of Rice Street. This will allow for better rider accommodations. In addition, the station location at Rice Street is recommended so as to minimize traffic conflicts both along University Avenue and Rice Street. Finally, the proposed station location allows for direct connection to the State Capitol Complex's pedestrian system, including the tunnel.

**The City concurs with the relocation of the Rice Street Station to the new site and configuration.**

The SDEIS also includes proposed changes to the alignment of the LRT along Robert Street north of 12<sup>th</sup> Street. Actually, the alignment changes were anticipated when the design for the State's Agriculture Lab were being formulated years before. So the alignment changes are in keeping with previous plans of the State of Minnesota.

**The City concurs with the rerouting of LRT along Robert Street to 12<sup>th</sup> Street, and the location of the Capitol East LRT station.**

- 5. Downtown St. Paul Alignment/Station Modifications:** The SDEIS endorses the alignment of LRT diagonally through the Athletic Club block. First conceived in 1990, the diagonal through the block contains the core business district station, creates a unique redevelopment opportunity for downtown and enables excellent potential pedestrian connections. Support for the diagonal alignment was memorialized by the City in the adoption of the Central Corridor Development Strategy in the Fall, 2007.

**The City fully supports the rerouting of the LRT, and location of the station, through the Athletic Club block.**

The SDEIS, by selecting the preferred site for the Vehicle Maintenance and Storage Facility, poses two alternatives for routing LRT tracks east of the Union Depot. The Wacouta Mid-Block is proximate to residential development, and has some impacts on street access, particularly on Wacouta Street. However, the other alternative (Broadway) has more onerous impacts on residential development, street access and exposure to potential flooding on Kellogg Boulevard at Broadway Street.

**The City prefers the Wacouta Mid-Block alternative, both from an LRT operations perspective as well as from a land use impact perspective.**

- 6. Traction Power Substations:** The general location of the 9 Traction Power Substations (TPSs) is set by the power needs of the LRT, and their inclusion is an essential part of the project. However, the specific location, design and landscaping of the TPSs may well have important community, architectural and historic impacts.

**The City understands and accepts the requirement that such TPSs be located approximately every mile, and within 500' of the LRT alignment. The City needs to be intimately involved in the location, design and landscaping of these 9 TPSs.**

- 7. Three-Car Platforms (Train Requirements):** Lessons learned from the Hiawatha LRT Line retrofit of existing two-car platforms to three-car platforms is compelling. Even though the Central Corridor LRT system may begin with only two-car trains, accommodations for three-car trains in the future suggests building the full length platforms as part of initial construction.

**The City supports the construction of three-car platforms as part of the initial construction.**

**8. Vehicle Maintenance and Storage Facility:** With the expansion of the Hiawatha LRT Line to three-car trains due to its ridership successes, the existing maintenance and storage facility will not be sufficient to meet the needs of the Central Corridor LRT Line as well. Therefore, a new facility is needed. Three sites were evaluated as possible locations: 1. The Southeast Minneapolis Industrial (SEMI) site; 2. The Dimond Products site in Lowertown; and 3. The Conseco Parking Lot site south of Kellogg Boulevard. The Conseco site is being recommended because:

- It is at the end of the line, allowing for further rail expansion to the northeast, east and/or east;
- It is at the end of the line, thereby minimizing the ‘dead head’ costs of having LRT vehicles having to travel to the middle of the line for the SEMI site;
- It minimizes opportunity costs, particularly in relation to the Dimond Products site, which is planned for major redevelopment in the future;
- It is in current public ownership (the Ramsey County Regional Railroad Authority) and its acquisition will not negatively impact the Cost Effectiveness Index.

The SEMI site has particular issues associated with having to cross busy freight rail lines and busy roadways, and is severely constrained by size and site configuration. In addition, its proximity to the existing Hiawatha Vehicle Maintenance and Storage Facility leads to inefficiencies as *all* LRT vehicles would need to travel to the same general area for storage and/or maintenance.

The Dimond Products site is currently privately owned, would require using 4<sup>th</sup> Street in front of the Farmers Market, and would take up a valuable redevelopment site. It would also present difficult operations for a future station at or near the Union Depot Concourse.

The Conseco site uses land that cannot likely be used for other land uses, does not preclude use of the air rights above the Concourse train platform, is not particularly visible from the river nor north of Kellogg Boulevard, and does not infringe on existing nor likely future riverfront open space opportunities.

**The City supports use of the Conseco site for the Vehicle Maintenance and Storage Facility.**

## V. Are the impacts and mitigation actions listed for each change accurate and complete?

### 3. Future infill stations:

- In Section 6.3.3.3 here is a discussion of parking impacts of the project which outlines the loss of parking spaces. In Table 6-10 (p 6-30) a loss of 30 to 40 on-street parking spaces is attributed to the potential of infill stations, or 10 to 13 per station. These numbers are based on very specific counts of existing and future parking spaces.
- The SDEIS lists potential for additional redevelopment at these locations ~~should the stations be built~~ when the stations are built (Table 3.1 and text on p 3-30)), and that appears to be a reasonable conclusion. The City has committed to do station area plans (likely in 2009) in anticipation of these three stations being built.
- In the section on Cultural Resources (3.4, Table 3-9 and text on p 3-99) a potential of visual impact is raised, dependent upon the location and design of the stations.
- In the section on Groundwater Resources (4.1, Table 4-1, and text on page 4-14) the SDEIS lists comments made by the Environmental Protection Agency (EPA) regarding potential short-term impacts on groundwater where dewatering may be required during construction. Potential mitigation actions include limiting the amount and duration of dewatering, precautions to limit spills of petroleum or hazardous substances and development of a Stormwater Pollution Prevention Plan and spill prevention plan (p 4-15).
- Finally, in the section on Hazardous/Regulated Materials Evaluation (4.8, Table 4-20, and text on p 4-76) the SDEIS lists a remote possibility that at the Hamline Station construction may encounter contaminants migrating from the Mowery Impoundment site. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.

**The assessments and mitigation plans for the future infill stations appear complete and are acceptable to the City.**

### 4. Capitol Area Alignment and Stations:

- In the SDEIS section on Acquisitions and Displacement/Relocations (3.3, Table 3-8 and text on p 3-62) lists the need for acquisition of 24, 020 square feet for right-of-way. No buildings would be affected. Mitigation listed includes reference to the Federal Uniform Relocations Assistance and Real Property Acquisition Act of 1970, which protects the rights of any individual or business displaced from property by the

- project. Sites in the Rice Station area are not viewed as significant with respect to possible redevelopment.
- The section on Cultural Resources (3.4, Table 3-9, and text on 3-98, 102 and 104) list the State Historic Preservation Office's (SHPO) concern about encroachment into the Lief Erickson Lawn in the southeast quadrant of the University and Rice intersection, and impact on the State Capitol Power Plant (691 Robert Street). Further SHPO has expressed concerns about vibration, noise and traffic impacts on the National Register-eligible Norwegian Evangelical Lutheran Church and Ford Motor Company Building. The SDEIS references the Section 106 process to fully address these issues, including defining methods for avoiding, minimizing or mitigating potential impacts. There is an ongoing process among the Metropolitan Council, MnDOT and the SHPO to develop such methods.
  - The section on Parklands and Recreation Areas (3.5, Table 3-12) also references Lief Erickson Lawn.
  - The section on Groundwater Resources (4.1, Table 4-1, and text on page 4-14) the SDEIS lists comments made by the Environmental Protection Agency (EPA) regarding potential short-term impacts on groundwater where dewatering may be required during construction. Potential mitigation actions include limiting the amount and duration of dewatering, precautions to limit spills of petroleum or hazardous substances and development of a Stormwater Pollution Prevention Plan and spill prevention plan (p 4-15).
  - In the section on Hazardous/Regulated Materials Evaluation (4.8, Table 4-20, and text on p 4-76) the SDEIS lists a possibility that at the Capitol East Station construction may directly affect the Medium potential site located at 610 North Robert Street. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.
  - In the section on Electromagnetic Fields and Utilities (4.9, Table 4-22, and text on pp 4-86 and 87) state that although the impacted areas along Robert Street have changed somewhat, affects on utilities are similar to the DEIS alternative.

**The assessment and mitigation plans for the Capitol Area Alignment and Stations appear complete and are acceptable to the City.**

## **5. Downtown St. Paul Alignment/Station Modifications:**

- The Land Use and Socioeconomic section of the SDEIS (3.1, Table 3-1, and text on pp 3-28, 29 and 32) describe the virtues of the Diagonal at 4<sup>th</sup>/Cedar Street (Athletic Club Block). However, the neither the chart nor the mitigation on the Athletic Club block adequately outlines the need for maintaining a pedestrian connection through

the block from the time LRT construction may impact the skyway link to the time redevelopment may be able to accommodate a replacement connection.

**Construction impacts on current skyway connections in the Athletic Club block must be included in the mitigation text, as well as a plan for mitigating such disruption, either through a temporary structure to support the existing connection, or construction of a temporary, heated skyway connection.**

- In the same section is a discussion of the Wacouta Mid-Block and Broadway alternatives. For the Wacouta option, the three parcels taken for the alignment would result in opportunity costs. However, the Broadway option (which requires closure of 4<sup>th</sup> Street east of Wall Street) also negatively impacts existing development (Farmers Market) and redevelopment of the Dimond Products site.
- The section on Acquisitions and Displacement/Relocations (3.3, Table 3-8, and text on pp 3-62 and 64) detail the need for property acquisition impacting 2 parcels on the Athletic Club Block and 3 parcels east of Wacouta Street. Mitigation listed includes reference to the Federal Uniform Relocations Assistance and Real Property Acquisition Act of 1970, which protects the rights of any individual or business displaced from property by the project.
- The Cultural Resources section (3.4, Table 3-9, and text on pp 3-97, 102 and 104) details potential impacts on the St. Paul Athletic Club and the Union Depot Headhouse. SHPO requested further research and analysis of the setting of Union Depot. Further, any station on 4<sup>th</sup> Street in Lowertown would be in the Lowertown Historic District.
- Further, SHPO has raised concerns about impacts of vibration, noise, and traffic impacts particularly regarding the Union Depot. The SDEIS references the Section 106 process to fully address these issues, including defining methods for avoiding, minimizing or mitigating potential impacts. There is an ongoing process among the Metropolitan Council, MnDOT and the SHPO to develop such methods.
- The section on Groundwater Resources (4.1, Table 4-1, and text on page 4-14) the SDEIS lists comments made by the Environmental Protection Agency (EPA) regarding potential short-term impacts on groundwater where dewatering may be required during construction. Potential mitigation actions include limiting the amount and duration of dewatering, precautions to limit spills of petroleum or hazardous substances and development of a Stormwater Pollution Prevention Plan and spill prevention plan (p 4-15).
- The section on Hazardous/Regulated Materials (4.8, Table 4-20, and text on pp 4-76, 78 and 79) references the slope of the water table generally running from higher elevation at Kellogg Boulevard southward toward the Mississippi River and potential

migration of contaminants from the USPS Building, former East Kellogg Train Depot and Johnson's Garage/Wells Fargo. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.

**Except as cited above regarding the Athletic Club block skyway, the assessment and mitigation plans for the Downtown St. Paul Alignment/Station Modifications appear complete and are acceptable to the City.**

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

## **6. Traction Power Substations:**

- The section on Land Use and Socioeconomics (3.1, Table 3-1, and text on pp 3-27, 28, 32, and 54) reference the importance of selecting the least impactful sites for TPSs. However, this seems insufficient to address the issues of context and opportunity costs.

**The City recommendations that mitigation include avoidance of sites fronting on University Avenue or major cross streets, such as Raymond Avenue. Further, location of TPSs in downtown will require particular sensitivity with respect to opportunity costs – finding sites/locations that are not attractive for “higher and better uses.”**

- The section on Acquisitions and Displacements/Relocations (3.3, Table 3-8, and text on pp 3-62, 63, and 64) describes the size of sites and mitigation to necessary acquisition. Mitigation listed includes reference to the Federal Uniform Relocations Assistance and Real Property Acquisition Act of 1970, which protects the rights of any individual or business displaced from property by the project.
- The section on Cultural Resources (3.4, Table 3-9, and text on pp 98, 99, 100, 101, 102, 103, and 104) lists the general sites of the TPSs, avoidance, minimization or mitigation of impacts on historic properties. The SDEIS references the Section 106 process to fully address these issues, including defining methods for avoiding, minimizing or mitigating potential impacts. There is an ongoing process among the Metropolitan Council, MnDOT and the SHPO to develop such methods.
- The section on Visual Quality and Aesthetics (3.6, and text on 3-116, 119, 121, 122, 126, 127 and 132) outline the needs for the TPSs of a one-story building, 20'X40' on

a site 45' X80'. Locations of such TPSs are subject to change during final design (although the criteria for such needed changes are not detailed). Further, mitigation treatments for visual impacts would be developed during final design through discussions with affected communities, resource agencies, and stakeholders.

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

- The section on Groundwater Resources (4.1, Table 4-1, and text on p 4-15) suggest that the TPSs are very sensitive to pollution and that dewatering is a potential requirement. Potential mitigation actions include limiting the amount and duration of dewatering, precautions to limit spills of petroleum or hazardous substances and development of a Stormwater Pollution Prevention Plan and spill prevention plan (p 4-15).
- The section on Hazardous/Regulated Materials (4.8, Table 4-20, and text on pp 78 and 79) outlines the potential sources of hazardous materials, including 12 possible sources. Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency's Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.
- The section on Electromagnetic Fields and Utilities (4.9, Table 4-22) states that until the specific sites for the TPSs are set, it is not possible to determine potential impacts on utilities.

**Except for the comments above relating to the siting, designing and landscaping, the assessment and mitigation plans for the Traction Power Substations appear complete and acceptable to the City.**

## **7. Three-Car Platforms:**

- The City believes that the impact of Three-Car Platforms is understated. According Section 6.3.3.3 and Table 6-10 (pp 6-29 and 30) Three-Car Platforms only result in a loss of 15 to 20 spaces. This appears to be a major undercounting. Once the decision was made for Three-Car Platforms, it became clear that access from only the signalized intersections would be insufficient. The next step was to evaluate the efficacy of mid-block pedestrian crossings to access the non-signalized ends of the platform. But that was deemed unsafe to have pedestrians crossing at unsignalized crosswalks at mid-block. The next step was to extend a walkway from the unsignalized end of the platform to the nearest cross street, where pedestrian



crossings would be safer. According to Table 6-10 this accounts for the loss of 230 to 260 parking spaces for a “desirable design element.” If this is to suggest the non-signalized crossings are desirable but not necessary, then it denies the safety considerations that went into the decision for such crossings.

Nevertheless, the City maintains that the loss of on-street parking is a loss that should be mitigated by the project.

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

- 1) Management system for on-street parking including installing parking meters on side streets in the station areas;
  - 2) Installing new meters along University Avenue where parking remains;
  - 3) Developing comprehensive signage for all on- and off-street public parking facilities, including time limit parking for one block either side of University Avenue on all secondary cross streets;
  - 4) Developing shared public, off-street parking lots (generally by reuse of existing inefficient off-street parking);
  - 5) Developing corridor-wide permit parking; and
  - 6) Considering off-peak parking on University Avenue.
- In the Cultural Resources section (3.4, Table 3-9, and text on pages 3-98, 99, 100, 102, 103 and 104) the discussion suggests that Three-Car Platform may have additional visual and construction impacts. Mitigation suggests ongoing coordination with project partners, the SHPO and the community toward an agreed solution to design of the stations.
  - In the Visual Quality and Aesthetics section (3.6, and text on p 3-127 and 132) state that mitigation treatments for visual impacts be developed during final design among affected communities, resource agencies and stakeholders.

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

**Except for the comments above relating to parking and visual impacts, the assessment and mitigation plans for the Three-Car Platforms appear complete and are acceptable to the City.**

### **8. Vehicle Maintenance and Storage Facility:**

- In the section on Land Use, Zoning, and Socioeconomic Impacts (3/1, Table 3-1, and text on 3-29 and 32) describes the zoning issues with respect to Holman Field air space restrictions. The promulgation of potential zoning restrictions associated with the site in Lowertown are being developed now through the Holman Field Joint Airport Zoning Board. The Metropolitan Council is coordinating with staff of the City and the Metropolitan Airports Commission as the zoning code amendments are being drafted.

Furthermore, a portion of the site is zoned B-5 Central Business. Zoning code amendments may be needed for the underlying zoning.

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

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

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

- The section on Acquisitions, Displacements and Relocation (3.3, Table 3-8, and text on pp 3-62 and 64) states that 25.3 acres on 4 separate parcels will be required for the Facility. It states the property is owned by the City, but it was recently sold to the Ramsey County Regional Railroad Authority. Mitigation listed includes reference to the Federal Uniform Relocations Assistance and Real Property Acquisition Act of 1970, which protects the rights of any individual or business displaced from property by the project. Sites in the Rice Station area are not viewed as significant with respect to possible redevelopment.
- The section on Cultural Resources (3.4, Table 3-9, and text on pp 3-79, 80, 97, 102 and 104) states that the Facility site is adjacent to the Lowertown Historic

District and partly overlaps the Union Depot Elevated Rail Yard, thereby having visual impacts on the following contributing properties: 300 4<sup>th</sup> St, 300 Broadway St., 308 Prince St., and 255, 271 and 281-299 Kellogg Blvd. The SDEIS references the Section 106 process to fully address these issues, including defining methods for avoiding, minimizing or mitigating potential impacts. There is an ongoing process among the Metropolitan Council, MnDOT and the SHPO to develop such methods.

- The section on Groundwater and Soil Resources (4.1, Table 4-1, and text on pp 4-14) mention the potential need for dewatering activities at the Facility site. Potential mitigation actions include limiting the amount and duration of dewatering, precautions to limit spills of petroleum or hazardous substances and development of a Stormwater Pollution Prevention Plan and spill prevention plan (p 4-15).
- No items are mentioned for impacts on Water Resources, Biota and Habitat, Threatened and Endangered Species, Air Quality, Vibration or Utilities.
- The section on Noise (4.6, and text on pp 4-53, 54, 56 and 57) states that no noise impacts as defined by the Federal Transit Administration will be generated by the Vehicle Maintenance and Storage Facility. Furthermore, it states that traffic noise dominates the acoustic environment in the area. However, much of the activity at this facility will take place at night when there is little traffic in the area. In addition, the quality of noise (e.g. “wheel squeal” and coupling) needs further analysis.

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

- The section on Hazardous/Regulated Materials (4.8, Table 4-20, pp 4-78 and 79) states that the Vehicle Maintenance and Storage Facility may directly affect the Former Union Depot Property (site 805) and the Former rail yard (site 809). Mitigation likely will include application to enroll the project in the Minnesota Pollution Control Agency’s Voluntary Investigation and Clean-up and Voluntary Petroleum Investigation and Clean-up Brownfields programs.
- The section on Economic Effects (5.0, and text on pp 5-8 and 10) states that surface parking lots are often viewed as having development potential. Conversion of parking on the site to permanent transit use may limit the type of redevelopment suitable for adjacent properties. However, the City believes that development potential of adjacent sites east of the Lafayette Bridge is already limited by likely Holman Field flight path restrictions. The potential of air rights

over the Depot platform would be near the site, but oriented toward the river. The potential for such development has been discussed for decades, and air rights redevelopment would be extremely expensive. It is not clear that the Vehicle Maintenance and Storage Facility would have a deleterious impact on the air rights above the platform.

**Except for the comments above relating to zoning code amendments, the rationale for site selection and focused noise impacts, the assessment and mitigation plans for the Vehicle Maintenance and Storage Facility appear complete and are acceptable to the City.**

### **Notes on 6.0: Transportation:**

The discussion in Section 6.1: Transit Effects states that the Baseline Alternative consists of improvements to the transit system that are relatively low in cost, and the “best that can be done” to improve transit without major capital investment for new infrastructure. However, the SDEIS only discusses east/west service, and cuts back on local service (Route 16) substantially. When this was proposed in the DEIS, the City and community took substantial exception to those cuts, as well as a lack of attention to feeder bus service. The full discussion is included in the attachments which includes the City’s response to the DEIS, June, 2006. A couple of points deserve emphasis here. First, cuts to the Route 16 service, especially in non-peak times, are particularly short-sighted. Many who use the Route 16 are transit-dependent, many with mobility issues. Those people often travel in the non-peak hours: weekday off-peak, evenings and weekends.

**The City recommends ~~reinstatement of the~~ maintaining current Route 16 service in the peak and non-peak hours to existing levels.**

Further, north/south feeder bus access is currently very poor, and in many cases, non-existent. Bus service in the more dense portions of the region should resemble a grid pattern, with minimum coverage of a 1-mile grid and 15 minute peak hour service. Only two primary north/south service even approaches these levels: Snelling and Rice. Fifteen-minute peak hour service should be instituted on all primary north/south streets. This will not only bolster ridership on the LRT and serve transit-dependent populations, it will also take pressure off of informal park & ride/hidden and ride along a corridor which will lose most of its on-street parking.

**The City recommends enhanced at least 15-minute peak-hour service (15-minute frequency or better) on Rice, Dale, Lexington, Snelling, and Fairview/Raymond as part of the overall LRT project.**

The discussion in section 6.3: Other Transportation Impacts raises some concerns about the other transportation elements in the Central Corridor which will have important impacts on the overall success of LRT on University Avenue.

- The SDEIS outlines the long-term effects of the project on Parking (6.3.3.3, including text on pp 6-29 and 30. The issues and City concerns are outlined in Section III, #7 of this review.
- The SDEIS outlines the long-term effects of the project on Bicycling (6.3.3.4, p 6-30). The report discusses bicycle crossings in relationship to paving and track heights. The City, however, has done a good deal of planning for bicycles in the Corridor, and could be referenced in the document. That planning is reflected in the text on p 6-25
- The SDEIS discusses Access to Properties and Businesses (p 6-31) and references earlier work done in downtown St. Paul, much of it dating back to the early 1990s. In addition, much of the south side access on University Avenue east of Marion will be affected by LRT. Further and updated analysis needs to be done for both downtown and the eastern end of University Avenue.

**The City suggests acknowledging the need to do further analysis during the Preliminary Engineering phase in downtown St. Paul and on University Avenue east of Marion Street with respect to property access.**

## **7) Technical Comments/Corrections:**

- P 1-22, Section 1.4, Planning Context, add *Saint Paul Downtown Development Strategy* and *Saint Paul on the Mississippi Development Strategy*
- P 2-37, Land Use, Consistent with Zoning: the Maintenance and Storage Facility site will require a rezoning.
- P 3-3, Table 3-1, Downtown St. Paul Alignment/Stations add: “The diagonal alignment allows for a direct connection to the skyway system” and “The diagonal alignment provides the greatest impetus to redevelopment of the 4<sup>th</sup>/Cedar block.”
- P 3-3, Table 3-1, Vehicle Maintenance and Storage Facility, add: “Will need to comply with Sec. 68.400 of the Zoning Code, *River Corridor Standards and Criteria*. It is also in the RC4 River Corridor Urban Diversified Overlay District.”

- P 3-29, Vehicle Maintenance and Storage Facility, second paragraph: needs a citation for Airport Zoning.
- P 3-36, Figure 3.2-2 has Quest in the wrong location at Kellogg and Wabasha (the hotel site) and should be on block bounded by 4<sup>th</sup>/St. Peter/Kellogg/Market.
- P 3-37: ‘Valley Recreation Center’ should be ‘Valley Play Area’ and the Museum Park is NOT maintained by the City, but rather the McNally Smith College of Music
- P-3-38, Figure 3.2-3: Erikson is misspelled, it has no “c.” Add label to the History Theater the “McNally Smith College of Music.”
- P-3-59, Vehicle Maintenance and Storage Facility is now property of the Ramsey County Regional Railroad Authority
- P-3-62, Vehicle Maintenance and Storage Facility – ibid
- P 3-93, 94: Should there be mention as to the long-term vibration impacts on the two churches, Conservatory of Music and Athletic Club?
- P 3-106, Table 3-12: It appears there are permanent impacts to the Downtown Children’s Play Area. That should be reflected in the table and discussed in the text.
- P 3-108, Table 3-13: Hamm Plaza is owned by the City’s Parks and Recreation Department; add Wacouta Commons, bounded by 9<sup>th</sup>/8<sup>th</sup>/Wacouta/Sibley
- P 3-112, Table 3-14: Add the Children’s Play Area (“yes” on short- and long-term effects), Mears Park and Kellogg Mall Park (“no” on short- and long-term effects).
- P 4-21: Xcel Energy is misspelled in the last paragraph
- P 4-64: The text on the diagonal alignment should mention the Athletic Club as a historic resource.
- P 4-81, Table 4-22, Downtown St. Paul Alignment/Stations: “diagonal reduces potential impacts to utilities in the street”
- P 5-4, Section 5.2.1: dated statement should be removed about “...downtown Saint Paul is currently experiencing a boom in loft and condominium housing.”

- P 6-2, 6.1.3.2 Baseline Alternative: The text states (1 11) that the enhanced Route 50 would be identical to the service assumed for the LRT Alternative. However, the Route 50 has two stops not planned for the LRT: Vandalia and Albert, and numerous stops in downtown.
- P 6-25, 6.3.2.2 “Downtown St. Paul and Capitol Area,” second paragraph, the first sentence should read “The City of Saint Paul is in the final planning phases for adopting a citywide transportation plan with a strong focus on improving the bicycle system.” And strike the sentence beginning on line 5: “The ten-year goal...”
- P 6-26, line 3: amend to read “...and integrating **at least** one east/west bicycle route parallel...”
- P 6-26 Midway East/Midway West add text reflecting that a separate plan done by Saint Paul in Fall/Winter, 2008 will specifically study and recommend bicycle and pedestrian accommodations and connections.
- P 6-26 Midway East/Midway West could include clarifying language “...bicyclists frequently travel along segments of University Avenue as par of their commute **due to the unusually wide outer traffic lanes.**” And also potentially add “Bicycle storage is largely unavailable for residents, employees or customers along University Avenue in Saint Paul.”
- P 6-27 Midway East/Midway West the SDEIS is incorrect in assuming that because pedestrian conditions are poor, people do not walk in the area. It would be more accurate to say on P 6028, last sentence “Pedestrian activities are lower in this area due to development patterns and traffic conditions. However, because of the high percentage of households without vehicles in the adjacent communities, walking is a necessary part of every day transportation in these neighborhoods.”
- P 9-5 City Actions are a bit too literal. Soften language in the following:
  - University Avenue Park at Raymond Redevelopment: “A new **green space is envisioned in the vicinity** of the intersection...”
  - Hmong Market Garden: “New public square and open space **is envisioned** between Arundel...”
  - Lexington-Chatsworth Block open space development: “**Opportunity for open space** to provide a focus...”

Raymond Village Park development, replace the first comment with:  
“Potential redevelopment may consider new open space in the area near Raymond and Charles.”

University Avenue Park at Raymond Development: This mistakenly repeats from P 9-5. Delete

Lexington Park development: “**A new green space is envisioned in the vicinity** of the intersection of Lexington and University”

Rondo Square park development: “**An opportunity for new open space could be incorporated as a part of future redevelopment of UniDale Mall.**” to replace the first comment.

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



## RESOLUTION CITY OF SAINT PAUL, MINNESOTA

Presented by \_\_\_\_\_

---

---

1 WHEREAS, a Supplemental Draft Environmental Impact Statement (SDEIS), for the Central Corridor  
2 Light Rail Transit project was released for public review by the Metropolitan Council on June 26, 2008;  
3 and

4  
5 WHEREAS, the SDEIS addresses nine project elements altered or added since the Draft Environmental  
6 Impact Statement was issued in June 2006; and

7  
8 WHEREAS, the City has reviewed the SDEIS and prepared a report, "City of Saint Paul Review of Draft  
9 Environmental Impact Statement for Central Corridor Light Rail Transit Project," outlining issues and  
10 concerns with the nine new project elements;

11  
12 NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of St. Paul adopts the attached  
13 report and requests that it be transmitted to the Metropolitan Council by August 25, 2008 and entered into  
14 the public record; and

15  
16 BE IT FINALLY RESOLVED that the City Council highlights the following elements of the attached  
17 report:

- 18  
19 1. The City recommends the inclusion of the three infill stations as part of the initial  
20 construction of the Central Corridor LRT project. Further, if fewer than all three are funded  
21 as part of the initial construction, the City should have a central role in choosing priorities.  
22 Finally, the City will press for construction of any remaining of the three stations quickly  
23 after the initial completion of the project.
- 24 2. The City recommends the development of a mitigation program for the loss of on-street  
25 parking, whereby, the City and Metropolitan Council staff work with affected property  
26 owners and tenants to maximize parking on and near University Avenue. And that the City  
27 and Metropolitan Council staff work together over the next two months to estimate costs  
28 and apportion them between the City and the project in an equitable manner.
- 29 3. The City recommends that the visual impacts be incorporated into the streetscape, station  
30 design and public art work being done within the Preliminary Engineering phase and  
31 encourages active community engagement, including working with Public Art Saint Paul.
- 32 4. Construction impacts on current skyway connections in the Athletic Club block must be  
33 included in the mitigation text, as well as a plan for mitigating such disruption, either  
34 through a temporary structure to support the existing connection, or construction of a  
35 temporary, heated skyway connection.
-

36

	Yeas	Nays	Absent
Bostrom			
Carter			
Harris			
Helgen			
Lantry			
Stark			
Thune			

Requested by Department of:

\_\_\_\_\_

By:

Approved by the Office of Financial Services

By: \_\_\_\_\_

Approved by City Attorney

By: \_\_\_\_\_

Approved by Mayor for Submission to Council

By: \_\_\_\_\_

Adopted by Council: Date \_\_\_\_\_

Adoption Certified by Council Secretary

By: \_\_\_\_\_

Approved by Mayor: Date \_\_\_\_\_

By: \_\_\_\_\_

**Hennepin County memo****Housing, Community Works & Transit**417 N. Fifth Street, Suite 320  
Minneapolis, MN 55401-3206Phone: **612-348-9260**

Fax: 612-348-8532 or 612-348-9710

[www.hennepin.us](http://www.hennepin.us)

Date: August 25, 2008

To: Kathryn L. O'Brien  
Environmental Service Project Manager, Central Corridor Project OfficeFrom: Joseph Gladke  
Manager, Engineering and Transit Planning, Hennepin County

Subject: Comments to Central Corridor Light Rail Transit Supplemental Draft Environmental Impact Statement

---

**Comments to the Central Corridor Project Office****Concerning the Central Corridor Light Rail Transit Supplemental Draft Environmental Impact Statement (SDEIS)**

On April 11, 2008, comments were sent from Hennepin County and Hennepin County Regional Railroad Authority after review of the SDEIS documents and prior to the beginning of the official comment period.

Upon review the documents received July 2<sup>nd</sup>, 2008, I would like to highlight several areas where our suggested changes were to be made, but appear not to have been changed.

The changes which I believe still need to be included are as follows:

- **Chapter 1, Section 1.4 Planning Context, page 1-23, 2030 Transportation Plan, December 2004**

Please note the following update for the Bottineau Transitway (aka Northwest Corridor):

Since the 2030 Transportation Policy Plan was adopted in 2004, a re-evaluation of the transit needs in the Bottineau Corridor, formerly called the Northwest Corridor, has occurred. Plans to serve this corridor with Bus Rapid Transit have been deferred. Hennepin County Regional Railroad Authority (HCRRA) is currently sponsoring an Alternative Analysis study to determine the best mode and alignment.

- **Chapter 1, Figure 1-11, page 1-24**

Recommend a revision for the title of this figure to:

**Figure 1-11**  
**Planned Transitways**  
**Source: 2030 Transportation Policy Plan, adopted 2004**

---

- **Chapter 11, Table 11-1 Key Project Issues, pages 11-12 through 11-16**

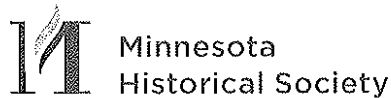
Issue No. 20: What is the meaning of the asterisk (\*) following Hennepin County in the column called “Involved Public Agencies/Local Units of Government”?

Issue No. 36 should include Hennepin County as an Involved Unit of Government

Issue No. 37 should include all project funding partners as Involved Public Agencies/Local Units of Government

Thank you for the opportunity to provide comments on this document.

C: Marthand Nookala  
Brent Rusco  
Joseph Scala



## State Historic Preservation Office

25 August 2008

Marisol Simon  
Regional Administrator  
Federal Transit Administration, Region V  
200 West Adams Street, Suite 300  
Chicago, IL 60606

Kathryn L. O'Brien  
Metropolitan Council  
Central Corridor Project Office  
540 Fairview Avenue  
St. Paul, MN 55410

Re: Central Corridor Project  
St. Paul and Minneapolis  
Ramsey and Hennepin Counties  
SHPO Number: 2007-1118

Dear Ms. Simon and Ms. O'Brien:

We are writing to provide comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Central Corridor Project.

As you know, this project is being reviewed under the provisions of Section 106 of the National Historic Preservation Act. That process, governed by the regulations found in 36 CFR 800, is designed to identify historic properties that are listed on or eligible for listing in the National Register of Historic Places, and to seek ways to avoid, reduce, and mitigate adverse effects to these properties. Our office has been involved in the Section 106 process throughout the project planning sequence, and consultation with us and other interested parties is ongoing. Ultimately, we expect that a Programmatic Agreement will be completed to outline measures to be taken to address issues related to the historic properties in the project area.

The SDEIS focuses on nine topic areas not covered in the earlier DEIS. It also includes more detailed information on historic properties located throughout the entire corridor. This letter provides an update on our concerns about significant issues that will need to be addressed as the Section 106 process continues. Other historic property issues identified in the DEIS, SDEIS, and by various interested parties (including those who have requested consulting party status) will need to be considered as well.

1. Table 3-10 (pages 3-77 through 3-79) of the SDEIS lists those properties in the project's area of potential effect that are listed on or eligible for listing in the National Register of Historic Places. We note that further information on these properties is found in several other reports, which are also available for review. For the purposes of the

Section 106 review of this project, we concur with the eligibility determinations documented in Table 3-10.

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

We acknowledge that there has been substantial consultation among project designers, our office, and other interested parties over the past several months to identify design issues related to many of the historic properties. It is crucial that frequent, regular consultation continue during the completion of the project design. Consultation *during* design will usually produce better results than review and comment *after* the design is done.

Listed below are several areas where the project design needs to be compatible with adjacent historic properties. The first two - the St. Paul Union Depot and the Capitol area - are of particular concern. In both of these areas, the proposed locations of project elements presented in the SDEIS are in basic conflict with character-defining features of historic properties. Even with the best work on a compatible final design, it is highly probable that the current project plans will result in adverse effects. Indeed, for the St. Paul Union Depot, current project plans create substantial adverse effects on three sides of the property. It would be truly unfortunate if a laudable effort to revitalize St. Paul's grand historic transportation center for future transportation needs was to significantly diminish the historic character of the facility. Other adverse effects are possible in some of the remaining areas as well.

(Note: In the following discussion the term "station" refers to all elements of a station facility, including the platform, shelter, ramps, walkways, and other built elements, and the term "track/structures" refer to all built elements of the line outside of station areas, including the track itself, poles, catenary, and other built elements.)

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

**B. The Rice Street station and track/structures from Rice Street to Robert Street.** This design needs to take into account the relationship between the project design and the State Capitol Mall Historic District (most primarily the

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

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

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

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

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

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

**H. The West Bank station, East Bank station, traction power substation, bridge, and track/structures from 35W to Oak Street.** This design needs to take into account the relationship between the project design and the University of Minnesota Campus Mall Historic District, East River Parkway, the Washington Avenue Bridge (including buildings/structures built as part of the bridge approaches on both banks), and Fire Station G/Engine House 5 (Mixed Blood

Theatre). In addition, other effects may relate to Pioneer Hall, the Mines Experiment Building, and the University of Minnesota Old Campus Historic District. Additional discussion is needed with regard to potential traffic issues related to the closing of Washington Avenue to vehicles.

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

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

3. Other issues that will need to be addressed in the Programmatic Agreement include the following:

A. Any specific protective and/or mitigation measures that are needed to address noise and vibration issues at historic properties.

B. Any specific provisions and/or mitigation measures that are needed to deal with parking and access issues related to historic properties. These issues include the removal of parking, particularly near commercial properties, as well as potential increases of parking on residential streets adjacent to the corridor.

C. A strategy that addresses the design of the three proposed future stations.

D. Provisions for any needed archeological surveys. The discussion should include a review of the surveys completed in the corridor to date.

E. Any specific provisions and/or mitigation measures that are needed to deal with temporary impacts to historic properties during the construction process.

4. The SDEIS acknowledges potential long-term effects to cultural resources located along the corridor. Redevelopment of the corridor has the potential to result in the removal of historic properties as the intensity and density of land uses increase. Indeed, such development along the Hiawatha Corridor in Minneapolis currently includes a proposal to demolish a National Register eligible property. Measures to encourage the rehabilitation of historic properties within the redevelopment context are needed. Such

---



measures could include National Register nomination forms for those properties that are eligible but that have not been listed (these forms would enable the State Historic Preservation Office to nominate the properties for actual listing, which would make the federal Preservation Tax Incentives available to developers and owners), other financial incentives for historic properties, and educational/technical assistance to owners of historic properties. Successful rehabilitation of historic properties along the corridor would greatly enhance the overall character of the Central Corridor project as a whole.

We look forward to working with all interested parties as the planning process for the Central Corridor project continues. Contact us at 651-259-3456 with questions or concerns.

Sincerely,



Dennis A. Gimmestad  
Government Programs & Compliance Officer

cc: Julie Atkins, Federal Transit Administration  
David Werner, Federal Transit Administration  
Jackie Sluss, Minnesota Department of Transportation  
Blythe Semmer, Advisory Council on Historic Preservation

Consulting parties:

Carol Carey, Historic St. Paul  
Bonnie McDonald, Preservation Alliance of Minnesota  
Joseph Ring, Prospect Park East River Road Association  
Fr. Paul F. Morrissey, St. Louis King of France Church  
Amy Spong, St. Paul Heritage Preservation Commission

Jack Byers, Minneapolis Heritage Preservation Commission  
Lucy Thompson, City of St. Paul  
Nancy Stark, Capitol Area Architectural and Planning Board  
Wayne Waslaski, State of Minnesota Department of Administration  
Kathleen O'Brien, University of Minnesota  
Jim Litsheim, University of Minnesota  
John Anfinson, National Park Service  
Jim Von Hayden, National Park Service  
Judd Rietkerk, Minneapolis Park and Recreation Board  
Steve Morris, RCRRA  
Rev. David Colby, Central Presbyterian Church  
Jeff Nelson, Minnesota Public Radio  
Heather Koop, Minnesota Historical Society  
Marjorie Pearson, Hess Roise  
Joe Trnka, HDR  
Evelyn Tidlow, Commonwealth Cultural Resources Group

**Minnesota Department of Transportation****Transportation Building**

395 John Ireland Boulevard  
Saint Paul, Minnesota 55155-1899

August 25, 2008

Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave North, Suite 200  
St. Paul, MN 55104

**Subject: Mn/DOT Comments on Central Corridor Light Rail Transit  
Supplemental Draft Environmental Impact Statement (SDEIS)**

Dear Ms. O'Brien:

Staff of the Minnesota Department of Transportation (Mn/DOT) have reviewed the above-referenced document during the public review/comment period and submit the following comments for your consideration.

General Comments

- Many of the comments in our June 5, 2006 comment letter on the DEIS appear not to have been addressed in the SDEIS. We anticipate that the Final EIS will include responses to our previous letter as well as this letter.
- Any use of or work within or affecting Mn/DOT right-of-way requires a permit. This includes any drainage modifications in or affecting flows to Mn/DOT right-of-way.
- There are multiple partners and organizations working on the Central Corridor project. The work products of the organizations provide valuable and detailed insights into a number of the areas addressed in the SDEIS. These work products could be referenced in the SDEIS as desirable outcomes, without having to replicate the information for the SDEIS. An example of this is the City of St. Paul *Central Corridor 7 Station Plans*, prepared by a consultant and published June 13, 2008. The Station Plans document contains valuable information on pedestrian circulation in the station areas. Each station plan contains a chapter called "Movement—Connecting the Corridor" with sections addressing "Connections" and "The Mobility Enhancement Area." While not design documents, station plans and similar materials can guide the thinking of the designers.
- Some SDEIS maps (e.g., figures S-1, S-2, and others) do not show the new Downtown Minneapolis Ballpark Station. It is difficult to locate the five stations shared with the Hiawatha LRT when only four are shown on the maps. [Figure 2-1 does show the Downtown Minneapolis Ballpark Station.]

Traffic Data/Operational Assessment/Potential Impacts to Trunk Highways

- Outdated traffic volumes were used in the SDEIS traffic analysis. This issue was also noted in our 2006 comments on the DEIS.

- There is no SDEIS discussion of traffic impacts to the regional system. This project will impact I-94, I-35W, TH 51 (Snelling Avenue) and TH 280, and we would like to see those impacts quantified. For example, placing LRT on the Washington Avenue bridge will reduce traffic capacity from an important river crossing, presumably forcing traffic onto other roadways, such as I-94 and I-35W. It is unclear if a new bridge or reduced capacity on the existing bridge was considered in the traffic modeling.
  - Due to our experience at signalized intersection operations on Hiawatha and 34th Avenue after the construction of the Hiawatha LRT, the Central Corridor LRT should not preempt the traffic signal at Snelling and University. Signal preemption would cause severe impacts to vehicular traffic operation that cannot be mitigated.
  - Similar to our comments in the DEIS review letter dated June 6, 2006, under Traffic Data/Operational Assessment, Appendix 9.8, we note that the Hiawatha LRT resulted in substantial vehicle traffic delays on Hiawatha Avenue. It would appear that the Central Corridor LRT at-grade crossings will likely significantly increase traffic congestion in this corridor, similar to Hiawatha Avenue. How can what we have learned from the Hiawatha experience improve the intersection level of service for the Central Corridor LRT?
  - Chapter 1: Figure 1-9 - The 2030 volume on I-94 just east of TH 280 appears to be wrong. It increased only 1000 in 25 years.
  - Figure 1-10 - No Park and Rides are shown on the Central Corridor.
  - Page 1-19, line 19-21 states: "Half of the locations on both University and Washington Avenues were projected to be operating near capacity in Year 2000 (Metropolitan Council, 2000), and the projections for Year 2030 show traffic growth at every location along these arterial roadways." Mn/DOT Comment - Figure 1-9 shows decreased traffic volumes on University Avenue between Snelling Avenue and Rice Street. The figure runs counter to the statement in the SDEIS.
  - Page 6-5 - Average auto occupancy of 1.2 seems high.
  - Page 6-12 -A reference should be provided for the LOS Table at the bottom of the page.
  - Page 6-16 - In Table 6-5, the heading that says "2006 ADT" should say "2005 ADT".
  - Page 6-17, 6-18 - Is Option 303 the preferred alternative? Mn/DOT has concerns with the proposal that stops I-35W exit ramp traffic onto 4th Street because of likely freeway impacts.
  - Page 9-5 - The Lafayette Bridge project has been advanced to 2010.
  - Page 9-17 - Impacts discussed under the third column of the chart on this page will likely divert traffic to I-94. We don't agree with the statement in the fifth column that I-94 congestion may grow at a less rapid rate with implementation of the Central Corridor LRT, and there is no data in the SDEIS to support the statement in the table.
-

### Air Quality Analysis

We reiterate our general comment from our June 5, 2006 letter that, given our comments regarding traffic volumes and level of service, the air quality hot spot analysis for selected intersections may need to be re-evaluated.

Specific comments regarding Section 4.5 include the following:

- Table 4-4: Should note/identify the five intersections that are proposed for further air quality analysis within their appropriate planning segment. It appears that there are no impacts and there will be no further analysis.
- Section 4.5.4.2, first paragraph: The statement regarding regional emissions analysis is misleading; if conformity requirements are met, they're met. Third paragraph: it would be helpful to include a summary table of the AA/DEIS detailed air quality analysis results for the intersections analyzed.
- Section 4.5.6 Mitigation: How will "excessive emissions" be determined?

### Mitigation

- Traffic mitigation analysis for the FEIS needs to be developed in coordination with the Mn/DOT Metropolitan District.

### Pedestrians, Bicycles and Transit

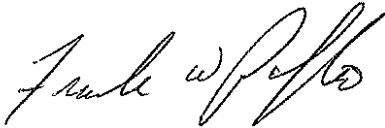
- Safely integrating pedestrians and bicycles into the at-grade LRT alignment through the University of Minnesota will be crucial for the successful operation of the LRT. Removing vehicles from that portion of Washington Avenue will help mitigate some conflicts; however providing loading areas for pedestrians and bicyclists while at the same time keeping them away from moving trains will take considerable planning and education.
- Last paragraph in Section 6-20 (page 6-18) discusses access to Washington Ave Bridge from Pleasant Street but fails to discuss the level of traffic impact on pedestrian circulation across Pleasant Street that may be expected to occur as a result of this change.
- The current existing raised median in the middle of University Avenue serves as a pedestrian refuge and sidewalk. With the median eliminated, some people may have difficulty crossing.
- Because of the ease of boarding and alighting associated with light rail transit, the CCLRT is an attractive option for a variety of pedestrians including people with disabilities. Some may use Metro Mobility to arrive at the LRT station. Consider mobility drop off zones at points where the passenger may arrive by mobility bus. For example, passengers with disabilities may choose to be dropped off at Union Depot or the U of M as they start their travel days. A mobility zone assures that should there be a problem with the loading or unloading, other mainline buses are not caught in a queue waiting for the problem to resolve.

Bicycle Operations and Safety

- Limited space may cause cyclists to use sidewalk when it is not appropriate to do so. Consider providing alternative routes to University Avenue, and connections to CCLRT corridor from these alternative routes especially for bike commuters who need a fast, seamless trip. The project should allow for a seamless route from U of M transit mall to Washington Ave. Bridge to downtown Minneapolis.
- NOTE: The accommodations for bicycle and pedestrians users should not always be described together. Bicycles are legally vehicles and must follow laws that pertain to motorized vehicles.

Thank you for the opportunity to review and comment on the Central Corridor Supplemental Draft Environmental Impact Statement. Please contact us if you have any questions regarding our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank W. Pafko".

Frank W. Pafko, Director  
Office of Environmental Services



JANICE RETTMAN  
Serving District 3  
Ramsey County Board of Commissioners



August 25, 2008

Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave. N., #200  
St. Paul, MN 55104

SDEIS Central Corridor Light Rail Transit Project Comments

Dear Ms. O'Brien:

As one of the Ramsey County Commissioners who represents part of the Central Corridor Route in Saint Paul (including all of Frogtown and the North End and parts of Summit-University and Midway area), I feel it is critical for my office to individually respond to the document on behalf of the people, residents and businesses we represent.

I hope and believe that "we hold these truths in common that the people most affected who currently live and work on and in the corridor should be able to continue to live and work in the Corridor, have better not less transit options, have better not less ingress and egress into their businesses and homes, should not disproportionately bear the burdens of the project, and the project must be fiscally responsible, minimize gentrification, maximize employment opportunities for the affected neighborhood's current residents, and built with employees who are paid prevailing wages and benefits, and be on time and on budget."

My voice is raised for those who have made the University and Central Corridor a working person's area for many generations and ethnic groups who are afraid they are not the ones this multi-million dollar investment is meant for and who will be the forgotten ones and who will be left behind or forced to move.

After reviewing the 2 SDEIS volumes we will address the following issues:

- Parking
- Mitigation
- Gentrification
- Fences and Access

220 Courthouse  
Ph: 651-266-8360

15 West Kellogg Boulevard  
[www.co.ramsey.mn.us](http://www.co.ramsey.mn.us)

Saint Paul, Minnesota 55102  
Fax: 651-266-8370

- Jobs
- Bus Service
- Stations--three car and additional stations
- Substation locations, design and ROW
- Capitol Segment
  - The Rice Marion jog
  - The approach and alignment
  - The trench
  - Churches and historical building
  - MPR and Macy's
  - Cedar
- Community Involvement

### Parking

#### **Citations in Document (pages)**

1-22; 3-3 (table 3-1); 3-33; 3-38; 3-54; 3-153; 6-20-23; 6-26 thru 6-29

#### **The presenting problem(s)**

Interestingly your document clearly identifies a **pre-existing condition** of a **shortage of parking**. Yet, the SDEIS disregards the finding and instead **exacerbates the problem beyond any neighbor, resident, or business's wildest imagination**. This flagrant disregard of the need for on-street parking and the almost **100% of loss parking along University Avenue, especially in the lower and moderate income areas, is an affront to the people who are here and tells them they do not matter**.

**Talking about "shock and awe"--there is anger, hurt, and absolute loss of faith in the process and project.**

And to pretend the side streets are not being used by residents and businesses right now between Rice and Hamline is short-sighted and further pushes the impact farther into the residential area where many homes have limited parking options (small lots, no garages, etc. and often already share spaces with local businesses).

Equally, there is already a shortage of parking in downtown and nothing is addressing the mitigation for this pre-existing shortage or the further **loss of downtown on-street parking along the corridor**.

And coupled with the statement "that adverse impacts are equal opportunity based" even though the majority of the Central Corridor neighborhoods (especially in St. Paul) are minority, low income, etc., then we submit, **"How can the impacts not be**

**disproportionate?"** Since the SDEIS only applies to the proposed changes, then are we to assume that the additional 3 stations are NOT needed or adverse?

Then what about the reduction in the #16 Bus service, including time between schedules, and the fact that there will be even a further reduction for the midnight shift workers when no LRT runs after 2 and before 5 AM. Have you ever ridden the #16 at 2 or 2:30 or 3 or 4 AM? They are the hard working people who are doing the cleaning and baking, garbage hauling and loading trucks, and delivery drivers and nurses. Who speaks for those workers and residents?

And who speaks for the ADA and seniors and those who can only walk a few yards to their stop from the bus or from their car to their destination? The light rail means nothing for them.

And where will the deliveries be made when there is no parking? Food, UPS, auto parts, essential medicines, etc. Who speaks for them?

And there is no mention that parked cars give safety and visibility to the businesses and suggests "come on in" to the visitors.

And there is no snow removal plan.

And are the wider sidewalks for pedestrians or for mini patios for coffee shops and bars and a different population than the hard working people CURRENTLY there who have added a vitality and a welcoming atmosphere for years for low and moderate income people and families to find an affordable homes and/or businesses and/or jobs?

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

Equally, your document clearly states **no mitigation is proposed at this time. This is unacceptable. The most your document states is that it will not reduce the traffic lanes. Again an unacceptable response.**

### **Suggested action/strategies/remedies**

Met Council has declared they see themselves as facilitators of the talk on parking---but NO FINANCIAL SUPPORT IS GIVEN.

THIS IS UNACCEPTABLE AND PARKING MITIGATION \$\$\$\$ MUST BE A PART OF THE CEI AND THE PROJECT.

O and M should and must pay for snow removal.



O and M must pay for any parking permits and enforcement.

Are three car stations mandatory? If not, construct 2 car stations with a 3-car footprint until we see ridership and parking requirements.

Consider shifting rails to allow parking on at least one side of University Ave.

Consider eliminating the extra green space and unnecessary concrete to create more opportunities for on street parking.

Since Saint Paul is not contributing dollars to the construction; then, perhaps all meter revenue should be retained by Ramsey County to procure additional parking and to assure turnover of on street parking spaces.

Met Council must include additional park and ride lots inside and outside of St. Paul to assure suburban ridership and protect neighbors/businesses from park and hide patrons using residential and small business parking.

The Met Council must replace all of the roughly 1,000 PUBLIC parking spaces and employ a variety of mitigation efforts included but not limited to building medium and small scale innovative environmental parking accommodations strategically located in the areas of greatest need and dependence especially between St. Paul Downtown and Hamline.

Parking during off peak hours, in front of the University Avenue businesses and homes, might be one option to be looked at carefully by Met Council.

### **Mitigation**

#### **Citations in Document (pages)**

3-138 thru 3-154; 4-60, 6-32

#### **The presenting problem(s)**

The SDEIS states that "These concerns (parking, accessibility, elder mobility, safety, community cohesion and neighborhood preservation) have been considered and the analysis determined that minority or low-income populations within the study area are not subject to any disproportionate impacts associated with the development of the Central Corridor LRT; furthermore, the benefits of the project are fairly distributed. No mitigation is proposed at this time."

This is not an acceptable analysis or response.

### **Suggested action/strategies/remedies**

Respectfully, the combination of having to beg for the three stations in the most economically/ethnically diverse area of the St. Paul portion of the Central Corridor, the absolute loss of almost 100% parking, and the disregard of the concerns for neighborhood character and history, and the not so subtle tones of building for the future rather than for the people here today (gentrification), the response that no mitigation is needed is inaccurate.

The committees that have been listened to the most by Met Council and consultants and staff are not necessarily the poor, the transit dependent, or the workers who has no time to come to meetings. Those who have spoken out felt they got a sales job rather than a willing listener. The businesses and residents have some very clear ideas and requests for mitigation and those should be incorporated into your mitigation plan and funding plan.

Funds must be provided for both short and long-term impacts as part of the project costs.

### **Gentrification**

#### **Citations in Document (pages)**

S-15; Chart S-2; 1-27; 2-38; 3-38; 3-119; 3-130; 3-138; 3.8.1 and 3.8.2 and 3.8.6; 9-1

#### **The presenting problem(s)**

The Environmental Justice chart shows "no anticipated disproportioned impacts with construction and use will directly impact small and minority businesses and residents". We respectfully disagree.

Although the SDEIS articulated goals say " facilitate the preservation and enhancement of neighborhoods in the Central Corridor LRT Study area" and "acknowledge the individual character and aspirations of each place served and of the region as a whole", the details and lack of action to assure no gentrification gives the "vision" of the project as being for those of the future not for those currently in and on the corridor.

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

Your Midway East section essentially promotes gentrification especially #2 and #3.

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

In the Capitol Area Alignment the word of "pleasant" for the Leif Erickson Lawn and the word "moderate" impact for the users belies the fact that this is MINNESOTA AND WE HAVE WINTER HERE 5 MONTHS OF THE YEAR.

Again, the SDEIS states that "These concerns (parking, accessibility, elder mobility, safety, community cohesion and neighborhood preservation) have been considered and the analysis determined that minority or low-income populations within the study area are not subject to any disproportionate impacts associated with the development of the Central Corridor LRT; furthermore, the benefits of the project are fairly distributed. No mitigation is proposed at this time."

This is not an acceptable analysis or response.

### **Suggested action/strategies/remedies**

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

Prohibit re-zoning for a period of at least 10 years following the completion of construction.

Freeze property taxes, excepting inflation increases, for a period of 10 years for existing owners or uses.

Prohibit the use of fees and assessments for any additional amenities not directly related or necessary to the transit project.

The amenity that has been postulated in the SDEIS is this wonderful existence of an economically diverse and ethnically diverse and transit dependent populations. The lack of any strategies and flagrantly stating no mitigation is needed severs the roots of the community and its dynamic vitality will die if not addressed. Mitigation must be addressed.

### **Fence and Access**

#### **Citations in Document (pages)**

6-31 and 6-32; 7-7

#### **The presenting problem(s)**

There has always been a concern by residents and businesses about community access and community building. The sentence "Additionally, various safety treatments and/or landscaping may be installed to hinder pedestrian movement outside of legal crossing areas" says to the community and those who already have a fenced corridor called I-94

and that is yet another barrier about to be built. Fences are good neighbors in back yards--not creating a wall between communities.

The access issues are not just during the time of construction--it is also beyond construction and for the life and operation of LRT. Be it in downtown St. Paul with the Churches, Macy's, residential housing and businesses or in the corridor, access must not be for the moment but a systemic and constant for all residents and businesses.

### **Suggested action/strategies/remedies**

Let no wall or fence be built--so no one will have to say, "Met Council, take the wall down."

### **Jobs**

#### **Citations in Document (pages)**

There are none.

#### **The presenting problem(s)**

In the entire document, there is no memorialization of Met Council's original promise to have a jobs component which would clearly recruit, train, and work with the Unions to have local workers and residents of the Corridor hired. Again, a "talk" and a "promise" is not worth the words said and is never implemented in this document.

### **Suggested action/strategies/remedies**

During the initial meetings, Met Council Staff presented to the neighborhood via Wanda Kirkpatrick that a job program was envisioned and would be implemented. That is the last it has been formally addressed. This is unacceptable. A promise was made.

Perhaps the Met Council should include some of the Port Authority requirements of 70% of the workers must come from the neighborhood, St. Paul, or Ramsey County.

All contracts must include provisions to meet Davis-Bacon requirements and local initiatives to provide opportunities for minority and women-own businesses.

Apprenticeships with the Unions and Project Labor Agreements will allow for an on time and on budget project. Incentives should be added to aid in bringing the project in early and to increase segments being done on time.

There is an abundant supply of local skilled labor to make up the workforce needed to build the project--especially if the aforementioned is used.

Funds need to be set aside to assist current Central Corridor St. Paul residents and businesses to expand and/or create new businesses that will serve current residents and businesses.

### **Bus Service**

#### **Citations in Document (pages)**

2-38; 6-3

#### **The presenting problem(s)**

The current #16/94/50/Express/Circulator buses currently serve the University corridor well especially for those who live, work and own businesses along University Ave. The schedule and frequency and the number of buses are often full to the brim with riders. Most of the riders stay within the Corridor. How can your document say there are no disproportionate impacts?

There is a reduction in the #16 Bus service including time between schedules. Additionally, there will be an even further reduction for the midnight shift workers as there is no LRT after 2 and before 5 AM. Even the partiers won't have a ride. Have you ever ridden the #16 at 2 or 2:30 or 3 or 4AM? They are the hard working people who are doing the cleaning and baking, garbage hauling and loading trucks, and delivery drivers and nurses. A 30-minute wait when you are tired or hungry or cold or sleepy or wet or want to just get to work or home feels like a lifetime. Who speaks for those workers and residents?

#### **Suggested action/strategies/remedies**

The current #16 bus schedule as of 08-08-08 must be funded from now through construction and continued for at least 10 years 24/7 everyday after the LRT is operational and the three additional stations are built and operational.

Feeder service within the corridor and suburbs must be included upon completion in order to assure the success of the system.

### **Stations three car and additional stations**

#### **Citations in Document (pages)**

S-9; S 2.4.2; 3-3; 3-28; 3-30 thru 33; 3-99; 3-100; 3-103; 6-20 thru 23

**The presenting problem(s)**

None of the ADDITIONAL loss of on-street parking spaces due to the 3 car platforms instead of 2 car platforms at any of the Stations along the Corridor have been addressed in either the DEIS or SDEIS.

Your document only states " The extra platform length needed to accommodate the three car trains would typically require eliminating 3-4 additional parking spaces per platform..."

Additionally:

1. Under key project elements, the language appears to have no real commitment to building any of the additional stations with the project. Further, there is no money for the stations included within the budget currently.

Equally, the loss of parking escalated by the 3 car stations instead of two car stations is blatantly ignored as an issue and again zero dollars are included anywhere to address the problem.

Table 3-1 again does not address the loss of on street parking.

There are no mitigation plans or dollars, only talk.

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

3. It is interesting that the only place there are stations one mile apart are in the lower and middle-income areas, which are the most diverse in jobs, ethnicity, and language. This is not consistent with "Met Council's objectives to preserve affordable housing" and will drive out these residents in favor of market rate or upscale housing.

**Suggested action/strategies/remedies**

Build the three stations as part of the project construction.

**Substations location, design and ROW**

**Citations in Document** (pages)

3-33; 3-54; 3-97 thru 100; 3-35; 4-53

**The presenting problem(s)**

1. At no time were people and businesses made aware during any of the process that there would be need for acquisition. In fact, just the opposite was asserted for both stations and substations that no acquisition would be needed in the St. Paul portion of the Central Corridor. Again, this is paradoxical with the current residents, people and businesses that although the area between Rice and Snelling has the fewest LRT stations but the most substations.

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

3. Such structures and design present poor visual presence that implies a lack of safety and devalues neighboring properties. Also, what materials will be used to curtail graffiti?

4. TPSS would add significantly to background noise especially at night. Your response is that the noise level is already a certain level does not meet the higher standards of being a good neighbor.

5. And what about the SHPO concerns for Churches in the downtown St. Paul area and the downtown alignment? Again your mitigation efforts appear silent and non-existent.

**Suggested action/strategies/remedies**

Stations must be designed and constructed to eliminate all additional noises.

TPSS must not be located near residential or historically sensitive properties.

**Capitol Segment****Citations in Document** (pages)

3-91 thru 94; 3-130; 6-31

**The presenting problem(s)**

The Churches (Central Presbyterian and St. Louis and others) and MPR and the businesses are concerned about access closure and/or ingress and egress plus the possibility of TPSS in the area. Hundreds of years of history cumulatively will be hurt by the loss of parking and access.

And what about the SHPO concerns for Churches in the downtown St. Paul area and the downtown alignment? Again your mitigation efforts appear silent and non-existent.

Equally, there is already a shortage of parking in downtown (as noted in DEIS and SDEIS) and nothing addresses mitigation of this pre-existing shortage or the further **loss of downtown on street parking along the corridor.**

**There is no mention of the issue with the alignment near the Capitol and the proposed trench.**

The Capitol Area Alignment and Stations and the " Marion street jog" appears to be more for appearance rather than convenience for the people living and working west of Rice Street who have farther to walk to access LRT.

The Capitol plan restricts access to 10 driveways along Cedar Street including the Churches.

#### **Suggested action/strategies/remedies**

As Representative Alice Hausman has been the Champion of the Central Corridor and has a vast knowledge on the Capitol area, we would suggest you meet with her for additional insight.

#### **Community Involvement**

##### **Citations in Document (pages)**

There appears to be a reference to the Central Corridor LRT Ongoing Coordination and Project Partner Involvement in the Decision Making Process Beyond Municipal Consent.

##### **The presenting problem(s)**

The document is lacking in depth, financial commitment and references a Public Input process that has yet to be written (when last we called for a copy) and clearly has been omitted from being the hallmark which this LRT project should have as its core value.

##### **Suggested action/strategies/remedies**

Sadly, the people in the core of the Central Corridor area have lost faith in the Met Council public process and feel that the staff are to be the salespeople of the project rather than their allies and committed to communities. Only an extreme change will correct this problem.



**Final Thoughts**

We remained silent on Hennepin County, MPLS, and the U of MN as they have "received a high degree of attention from the Met Council and have executed a MOU addressing their issues, the problems and remedies for mitigation."

All mitigation and attention cannot be focused on the West side of the river, we must demand \$\$\$, more than talk, for those we represent.

Over the years, my staff and I have attended most all of the meetings regarding Central Corridor. Our comments are well documented in the documents we are attaching with this letter. Our intent has always been to make sure the people here on the Corridor were not getting mixed messages and were a part of the solution. The people's concerns, issues, and their wanting to be a player in making the decision have never been part of the problem.

There is a book written by Doug Woods entitled Old Turtle. At two different points in the book Old Turtle says, "STOP". What Old Turtle's message was that every one and every thing has something special to offer to the solution so that together no one is left behind and everyone is going forward together.

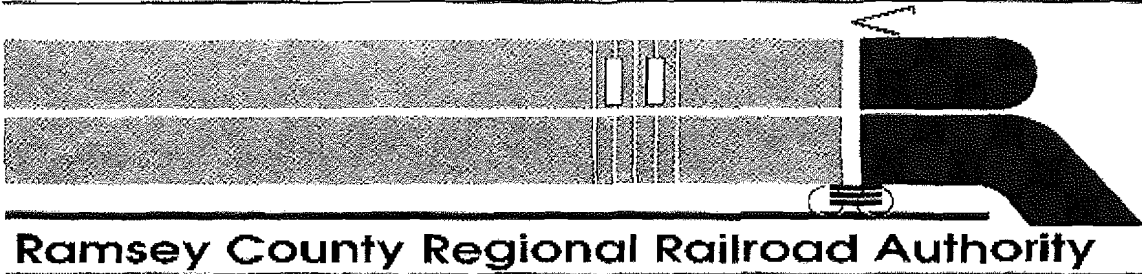
I offer these issues to the Met Council with hope the STOP will be heard and there will truly be a new commitment to the people and businesses most impacted so the project can be a win win.

Sincerely,



Janice Rettman  
Ramsey County Commissioner

Attachments (dated 6-4-06 w/multiple attachments; 6-19-08; and 7-25-08)



6560 Ramsey County Government Center West, 50 Kellogg Boulevard West  
St. Paul, Minnesota 55102 (651) 266-2760 / FAX (651) 266-2761

August 22, 2008

Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Avenue  
St. Paul, MN 55104

Dear Ms. O'Brien,

Enclosed is the resolution for the Comments on the Central Corridor Supplemental Draft Environmental Impact Statement. The resolution was passed by the Ramsey County Regional Railroad Authority on Tuesday, August 19, 2008. A fully executed copy of the resolution will be sent to you when available.

Sincerely,

A handwritten signature in black ink, which appears to read "Timothy A. Mayasich". The signature is written in a cursive style with a large, sweeping flourish at the end.

Timothy A. Mayasich  
Director

# RESOLUTION

Board of Ramsey County Regional Railroad Authority

Date: August 19, 2008 No: R08-33

---

(Page 1 of 2)

WHEREAS, The Metropolitan Council has prepared a Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor light rail transit line; and

WHEREAS, Public hearings on the SDIES have been held to gather comments on the project; and

WHEREAS, Public input continues to raise issues such as pedestrian crossings, gentrification and economic disparity, number of stations and public art as important aspects of the project yet to be resolved; and

WHEREAS, The Metropolitan Council has committed to continue to work with the Ramsey County Regional Railroad Authority and other project partners to resolve outstanding issues; Now, Therefore Be It

RESOLVED, That Ramsey County Regional Railroad Authority generally supports the changes outlined in the SDEIS and provides the following comments; and Be It Further

RESOLVED, That the Metropolitan Council must work with the neighborhoods, local businesses and other project partners to satisfactorily respolve outstanding issues; and Be It Further

RESOLVED, That Ramsey County Regional Railroad Authority staff will continue to work with project staff to refine the LRT component of the Union Depot multi-modal transit hub; and Be It Further

RESOLVED, That Ramsey County Regional Railroad Authority staff will continue to work with project staff to satisfactorily address the issues listed in Rail Authority Resolution R06-33, dated May 23, 2006, and those raised in the Preliminary Design Plan Public Comment Record compiled by Ramsey County in June 2008, and in the document entitled "Central Corridor LRT Ongoing Coordination and Project Partner Involvement in the Decision Making Process Beyond Municipal Consent;" And Be It Further

RESOLVED, That the Ramsey County Regional Railroad Authority will continue to work with the Metropolitan Council and other project partners to ensure the project, as built, best meets the needs of the citizens of Ramsey County.

---

# RESOLUTION

Board of Ramsey County Regional Railroad Authority

(Page 2 of 2)

## RAMSEY COUNTY REGIONAL RAILROAD AUTHORITY

	YEA	NAY	OTHER
Tony Bennett	X		
Toni Carter	X		
Jim McDonough	X		
Rafael E. Ortega	X		
Jan Parker	X		
Victoria Reinhardt	X		
Janice Rettman	X		

Jim McDonough, Chair

By: \_\_\_\_\_  
Tony Bennett, Secretary



CITY OF SAINT PAUL  
*Christopher B. Coleman, Mayor*

COMMERCE BUILDING  
8 Fourth Street East, Suite 200  
St Paul, Minnesota 55101-1024

Telephone: 651-266-9090  
Facsimile: 651-266-9124

Kathryn L. O'Brien  
Environmental Service Project Manager  
Central Corridor Project Office  
540 Fairview Avenue  
St. Paul, MN 55410

Re: Comments on the Supplemental Draft Environmental Impact Statement  
Central Corridor Light Rail Transit  
Federal Transit Administration, June 2008

Dear Ms. O'Brien:

Thank you for submitting a copy of the Central Corridor Draft Environmental Impact Statement (SDEIS) to the Saint Paul Heritage Preservation Commission (HPC) for consideration. The HPC discussed the document at their August 14 Business Meeting and made the following comments and observations at that time:

1. The light rail will run through two locally designated historic districts, Lowertown and University-Raymond, and will pass by several other designated and determined eligible historic sites. In order for the HPC to safeguard St. Paul's historic resources there are a wide range of considerations the HPC will deliberate to determine whether the proposed work complies to appropriate preservation standards and guidelines and whether any negative impacts to cultural resources are appropriately mitigated.
2. The SDIES appears to be a comprehensive compilation of identified historic resources with a variety of potential impacts taken into consideration. The HPC did not, at this time, make any specific recommendations or decisions regarding the identified impacts to cultural resources in the SDIES.
3. Because the HPC is both a formal consulting party through the Section 106 Process and will be hosting public hearings on the proposed changes within the two historic districts, the HPC involvement with this project is fluid and on-going.
4. The HPC anticipates that any issues with the proposed project and negative impacts to cultural resources will be worked out through both the Section 106 Process and the HPC public hearings.
5. Also, keep in mind the HPC has not forwarded any recommendations regarding cultural resources and the SDEIS to the City Council or Mayor's office.

Please feel free to call me with any questions or comments you may have at (651) 266-9079.

Sincerely,

Amy Spong  
Historic Preservation Specialist

Cc: Donna Drummond, Allan Lovejoy, PED  
City Council  
Mayor's office  
Dennis Gimmetad, SHPO

**UNIVERSITY OF MINNESOTA***Twin Cities Campus**University Services  
Office of the Vice President**317 Morrill Hall  
100 Church Street S.E.  
Minneapolis, MN 55455**Office: 612-624-3557  
Fax: 612-626-2278  
www.uservices.umn.edu*

August 25, 2008

Kathryn O'Brien  
Environmental Service Project Manager  
Central Corridor Project Office  
540 Fairview Avenue  
St. Paul, MN 55410

Dear Ms. O'Brien,

Attached please find detailed comments from the University of Minnesota in response to the *Central Corridor Supplemental Draft Environmental Impact Statement*. As you are aware, the University of Minnesota will be a key component of the Central Corridor Transit Line, and therefore has taken considerable steps to be an engaged partner throughout this process.

- Over one-fourth of the projected ridership on the Central Corridor will be to or from the University of Minnesota.
- The University already has a very high usage of transit to and on campus. Two-thirds of the trips to and from our campus are made via alternative transportation modes, and over 20,000 students and employees use transit as their primary means of commuting.

Not only will the Central Corridor pass through a campus that attracts 80,000 people on a typical day, but it will pass through the heart of the campus' most vibrant and busy areas.

- Washington Avenue is the hub for University residence halls, Coffman Memorial Union, the graduate and professional schools, the Institute of Technology, the University libraries, and scores of heavily used classrooms. It's a twenty-four/seven environment.
- The University's Academic Health Center, hospitals, and major biomedical research facilities are on the corridor. Over 500,000 people visit the outpatient clinics, alone, each year. Cutting edge research in the areas of cancer, AIDS, heart disease, muscular dystrophy, paralysis, diabetes, stroke, infectious disease, drug discovery, bone disease, and Alzheimer's is conducted in the laboratory most impacted by the CCLRT line. In addition, other significant technical research also occurs along the avenue.
- On Washington Avenue, "rush hour" occurs ten times per day—at the beginning of every class period. Washington Avenue is one of the densest, liveliest pedestrian environments in Minnesota.

The SDEIS lists five issues that justify the need for transportation improvements in the Central Corridor: traffic congestion, increased traffic demand, increased travel times, decreased safety, and lack of available and affordable parking. The attached detailed comments reflect the University's attention to these principles, as well as to our own design principles that have guided our work:

- The optimal operation of the Central Corridor LRT line is vital to a strong, regional, multimodal transportation system.
- Safety is fundamental to the successful operations of the Central Corridor.
- The Central Corridor should realize development opportunities while reducing impact to the urban environment.
- The functionality and aesthetics of the University campus must be enhanced.

As you review these comments, please know that we look forward to continuing to work with you and all of our regional partners throughout the next phases of the project to ensure a corridor that will be well used, safe, accessible, efficient, and a net benefit to the urban environment.

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement for the Central Corridor light rail line. If you have specific questions regarding the University's comments, please contact Bob Baker, Executive Director of Parking and Transportation Services, at 612-625-9543, or [baker006@umn.edu](mailto:baker006@umn.edu).

Sincerely,



Kathleen O'Brien  
Vice President, University Services

cc: President Robert H. Bruininks, University of Minnesota  
Peter Bell, Chair, Metropolitan Council  
Mayor Chris Coleman, City of St. Paul  
Commissioner Jim McDonough, Ramsey County  
Commissioner Peter McLaughlin, Hennepin County  
Mayor RT Rybak, City of Minneapolis



**CENTRAL CORRIDOR SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT****University of Minnesota  
General Comments**

**The SDEIS identifies many significant unresolved environmental issues and notes that the impact and mitigation will be detailed in the FEIS. A more thorough identification and analysis of unresolved environmental impacts and potential mitigations is necessary.**

The unresolved issues that the SDEIS identifies are significant, and many of these issues are of particular concern to the University. For example, the following information is not included in the SDEIS:

1. The final analysis of impacts on historic resources, including the Campus Mall Historic District, the Old Campus Historic District, the Mines Experiment Station Building, East River Parkway, Pioneer Hall, and the Prospect Park Historic District.
2. Certain traffic analyses for the University of Minnesota area.
3. The design of the Washington Avenue Mall from Pleasant to Walnut, including station and platform design and location.
4. The design of the West Bank Area.
5. The impact of vibration (both construction-related and from ongoing operations) on University research and operations.
6. The impact of electromagnetic interference (EMI) on University research and operations.
7. Detailed air quality modeling and analysis.
8. The evaluation of forty-two additional sites where there may be hazardous or regulated materials, several of which are on University property.
9. Detailed analysis of the project's "contribution to regional goals."
10. The impact of modifications to the Washington Avenue Bridge.

By not identifying and analyzing the extent of these issues and potential mitigations as part of the SDEIS, the Metropolitan Council may not have information addressing these issues when it considers whether to adopt a revised Locally Preferred Alternative ("LPA") for the Central Corridor LRT project. The goal of the SDEIS is to provide "the informational basis for a decision by the Metropolitan Council to adopt a revised LPA" (10-5). However, the SDEIS identifies a number of "unresolved issues" that it does not discuss in detail. Rather, the SDEIS states that FTA and the Metropolitan Council will analyze the issues for the first time in the FEIS. (*See* SDEIS at 10-5 and detailed comments below.) Given that the Metropolitan Council intends to decide whether to adopt a revised LPA before the FEIS is complete, the Metropolitan Council may not have information with respect to the unresolved issues when it considers the revised LPA.

To address these issues, the Metropolitan Council may wish to explain in the SDEIS, or in elsewhere in the administrative record (such as in response to comments on the SDEIS), the information that is currently known regarding the unresolved issues stated above as well as the other unresolved issues included in the document.

Additional detail as to the University's concerns regarding these issues is outlined below and in the University's detailed comments that follow.

### **1. Vibration and electromagnetic interference (EMI) impacts on the University**

As noted above, the SDEIS does not adequately identify the potential impacts of vibration (both construction-related and operational) and EMI on University research. Rather, the SDEIS notes that these issues will be addressed in the FEIS. The CCPO has provided the University with initial reports that predict significant vibration and EMI impacts and propose potential mitigations for such impacts. These reports are preliminary and conceptual in nature, and do not provide adequate detail as to the effectiveness of these mitigation strategies on the University's most sensitive research. Nor do the reports address impacts on research continuity, research study schedules, future monitoring and on-going maintenance of the proposed mitigation measures.

For example, the nuclear magnetic resonance (NMR) facility in Hasselmo Hall, which will be less than 80 feet from the LRT tracks, supports \$110 million in grant funding, 160 researchers, across 22 University departments, as well as undergraduate and graduate teaching. The cutting edge research conducted in this lab has advanced discoveries and treatments in the areas of cancer, AIDS, heart disease, muscular dystrophy, paralysis, diabetes, stroke, infectious disease, drug discovery, bone disease, and Alzheimer's. Examples of particular research impacted by the construction and operation of LRT include:

- A large group led by Drs. Hiroshi Matsuo and Reuben Harris has used this facility to discover the structure of APOBEC3G, a protein that restricts HIV infection. This work was published in *Nature*, the most prestigious scientific journal.
- Dr. Kylie Walters and coworkers published a study in *Nature* that helps pave the way for treatment of Parkinson's disease.
- Drs. Gianluigi Veglia and David Thomas published a series of papers in the *Proceedings of the National Academy of Sciences* that unlocks the protein structural changes that can cure congestive heart failure.
- Dr. Kevin Mayo has used the facility to discover a new class of cancer drugs.

Another laboratory impacted is the Chemistry NMR facility in Kolthoff Hall. This lab supports over 400 researchers as well as undergraduate teaching, and includes research in the areas basic chemistry, drug discovery, and environmental advancements in such areas as biodegradable plastics and biofuels.

#### **A. Vibration:**

At a meeting with University faculty and staff on Monday, August 11, the Central Corridor Project Office (CCPO) presented its initial report on vibration impacts and mitigations. The CCPO stated the need to do additional testing sometime in the near future. Additional testing is required due to anomalies in the tests results on the existing Hiawatha line. These results serve as a baseline for the predictions made for the vibration impacts of the CCLRT line. This calls into question the validity of the predictions made in the report. In addition, since the CCPO conducted initial testing in May, additional research labs have been identified as having sensitive equipment.

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

In addition, there has not been any analysis of construction vibration impacts on such research nor any proposed mitigations for such construction-induced vibrations. Since many experiments occur over days and even weeks, the equipment would need to be relocated or replaced at another site in order for research to continue during the construction period. Impacting study schedules could impact their grant requirements.

The report's uncertainty regarding the NMRs, the questions as to the validity of the assumptions made and the resulting mitigations proposed, and the lack of analysis as to construction-induced vibrations raise significant concerns for the University, which we consider critical to our operations.

#### **B. EMI:**

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

In addition, the proposed mitigations do not address impacts to U research as equipment becomes more advanced, thereby limiting the future use of University facilities along the corridor.

### **2. Adverse Effects on Historic and Cultural Resources**

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

### **3. West Bank Area**

The Hiawatha LRT connection reviewed in the SDEIS requires the southwest ramp to Cedar Avenue from Washington Avenue to be reconstructed. The preliminary engineering process also has identified the need to modify the other ramps to Cedar Avenue in order to accommodate the station at 19th Avenue. These roadways are being reconstructed in such a way that will preclude future development in the area around the station.

The municipal consent design of the road connections in the southeast quadrant of Cedar Avenue and Washington Avenue will create confusion and operational problems. This area has not been addressed in any of the traffic studies or in the SDEIS. As stated in the memorandum of understanding between project partners, the west bank station area must be redesigned to accomplish traffic calming, safe interactions of pedestrians, and creation of developable parcels.

**4. Washington Avenue Mall Design**

The University and partners are working together to identify a design and engineering solution for the Washington Avenue Mall. The University looks forward to resolving the outstanding design and operations issues in order to develop a plan that will meet the University's approval, as specified in the Memorandum of Understanding.

**5. Traffic Mitigations**

All general purpose traffic is being rerouted through campus as a result of putting the LRT at-grade on Washington Avenue. The SDEIS does not address all of the specific improvements required to accommodate the increased traffic. Roads within campus will need to be reconfigured and new connections constructed. The University will work with the project partners to put together an acceptable street traffic improvement plan to mitigate the traffic rerouting, as specified in the Memorandum of Understanding.

## Central Corridor Supplemental Draft Environmental Impact Statement

### University of Minnesota Detailed Comments

SECTION/TABLE	PAGE	COMMENTS
<b>SUMMARY</b>		
S.2.2	S-5	<u>Alternatives Evaluated in the AA/DEIS</u> This discussion does not explain how the Northern Alignment was evaluated and the reasons for its dismissal during the scoping process.
	S-6	<u>Stations</u> Station platforms should be expanded to 300 feet to accommodate three-car trains.
S.2.4.4	S-8	<u>Key Project Elements – University of Minnesota Alignment</u> The Washington Avenue Mall should extend from approximately the Washington Avenue Bridge (Pleasant Street) to Walnut Street.  Discussion of the University of Minnesota alignment does not include exploration of the Northern Alignment and the decision to proceed with the Washington Avenue alignment during the more recent process.
Table S-1	S-13 -17	Table S-1 summary statements fail to capture many important impacts on the University and surrounding neighborhoods that occur with the LPA changes documented in the SDEIS. These impacts include traffic, cultural resources, pedestrian and bicycles, business takings/relocations, and pedestrian/bicycles as well as indirect and cumulative impacts related to these topics. Further, many issues of concern to the University (e.g. vibration and electromagnetic concerns) are deferred until the FEIS precluding sufficient opportunity to review the full effects of the changes to the LPA.
	S-13	<u>Physical and Operating Characteristics of Proposed Changes to AA/DEIS LPA – Environmental Effects</u> The proposed changes to AA/DEIS LPA column under the University/Prospect Park area should include an explanation of the transit mall section from Pleasant to Walnut in the East Bank area.  The proposed changes to AA/DEIS LPA column under the University/Prospect Park area should include an explanation of the proposed design for the West Bank station and surrounding area. Problems with the current design for the West Bank are: it negatively effects the regional transportation network, it creates an unsafe pedestrian environment, and it limits future building site development.
Table S-2	S-16	<u>Comparative Evaluation of the AA/DEIS and Proposed Changes</u> Determine effects of on campus mitigations for closure of Washington Avenue to vehicular traffic.
	S-17	Specific short-and long-term effects (including construction-related effects) to the bike/pedestrian facilities on the U of M campus should be explained in greater detail.

SECTION/TABLE	PAGE	COMMENTS
S.2.6	S-19	The discussion of Agency Coordination does not reflect the extent of interaction with the University of Minnesota, the high degree of concern expressed by the University in regards to changes in the project definition to remove the tunnel and opt for a Washington Avenue at-grade alignment.
<b>CHAPTER 1 PURPOSE AND NEED FOR THE PROPOSED ACTION</b>		
Table 1-2	1-9	The University would like clarification on the characterization of employment in the U of M area as it exists today; what is included--industrial, dependant on railroad service. How were the University figures calculated?
1.3.1	1-14	Chapter 1 does not adequately discuss the character of trips to the University campus beyond those as an employment center. The University provides many services to the public, including a vast number of medical services, as well as entertainment and sports venues, which bring numerous visitors to the campus each day, many of whom visit this area infrequently.
1.4.2.3	1-30 – 1-31	Portions of the SDEIS appear to accurately describe the actions of the CCMC and the Metropolitan Council on February 27, 2008. For example, Chapter 2 of the SDEIS discusses the Metropolitan Council's action of February 27, 2008 as approval of an "option" to "refine the scope" of the proposed LRT project and "thereby set the scope of the project for inclusion in the SDEIS" (2-23). However, this section of the SDEIS inaccurately describes the Metropolitan Council's action. For example, the SDEIS terms the Metropolitan Council's action on February 27, 2008 as a "project decision day" (1-30) and states that "this SDEIS will determine the environmental effects of the revised LPA prior to the development of an FEIS" (1-31).
<b>CHAPTER 2 ALTERNATIVES CONSIDERED</b>		
	2-13	<u>No.2 U of M Alignment East Bank</u> The reader would benefit from more specific discussion of the fiscal constraints and cost-effectiveness concerns that led to the abandonment of the AA/DEIS tunnel concept.
	2-15	<u>At-Grade LRT Alignment with Traffic Alternative</u> The description of LRT at grade with traffic does not explain why it is not a feasible alternative. The description suggests that it would function acceptably.
	2-15	<u>University of Minnesota Alignment – East Bank</u> The Washington Avenue Mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.
	2-18/19	<u>Three-Car Operations</u> Station platforms should be expanded to 300 feet to accommodate three-car trains.
	2-20	<u>Washington Avenue Bridge</u> The upper deck of the Washington Avenue Bridge currently accommodates bicycles in addition to pedestrians. This should continue after the construction/operation of LRT. Structural redundancies will need to be added to the Bridge to address the "fracture critical" designation.

SECTION/TABLE	PAGE	COMMENTS
	2-20-21	<p><u>Other Key Project Elements Determined Through the On-Going Decision-Making Process to Have Potential Significant Impacts to Human and Natural Environments</u> The reader would benefit from a more complete description of the Northern Alignment, including key dates and the process of agreement between the Metropolitan Council and the University permitting the University to conduct the study.</p> <p>The reader would benefit from a complete definition of "CEI" and a fuller explanation of cost effectiveness considerations.</p>
	2-21	The conclusion that the Washington Avenue at-grade alternative avoids direct impact to a historic resource should be further explained, as neither the Section 106 determination of effect nor the Section 4(f) use status of the Campus Mall Historic District and Knoll area or Washington Avenue Bridge has been determined.
Table 2-1	2-24	<u>Physical and Operating Characteristics of Proposed Changes to AA/DEIS LPA</u> The proposed changes to AA/DEIS LPA column under the University/Prospect Park area should include an explanation of the transit mall section from Pleasant to Walnut in the East Bank area.
Figure 2-3, 2-5	2-27 and 2-32	<u>Central Corridor LRT Project Description</u> The Washington Avenue Mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.
Figure 2-5	2-32	<u>University of Minnesota Alternatives</u> Transit mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.
Table 2-4	2-39	<u>Comparative Evaluation of the AA/DEIS LPA and Proposed Changes to AA/DEIS LPA – Environmental Effects – Noise and Vibration</u> Continue to work with University to identify sensitive areas and mitigation strategies, especially for construction period.
	2-39	<u>Comparative Evaluation of the AA/DEIS LPA and Proposed Changes to AA/DEIS LPA – Environmental Effects – Electromagnetic Field and Utilities</u> Continue to work with University to identify sensitive areas and mitigation strategies, especially for construction period.
<b>CHAPTER 3 SOCIAL EFFECTS</b>		
Table 3-1	3-6	<u>Summary of Land Use, Zoning, and Socioeconomic Impacts for the Key Project Elements</u> Add detail to specify the block of businesses noted is between Harvard Street and Walnut St on Washington Avenue.
3.1.4.2	3-31	<u>University of Minnesota Alignment</u> This description needs better discussion/acknowledgement of the change in traffic patterns associated with the Washington Avenue Mall impacts on the land use and social setting in the broader University neighborhoods.

SECTION/TABLE	PAGE	COMMENTS
	3-31	<p><u>Key Project Elements University of Minnesota Alignment</u> On-street parking will be acquired to construct the Washington Avenue Mall. A one-block stretch of retail on Washington Avenue, between Harvard Street and Walnut Street, will not have direct access to vehicles. Station types and locations have not yet been determined. Church Street is not the definite, final location of the East Bank station.</p>
3.2	3-33	<p><u>Neighborhoods, Community Services, and Community Cohesion – U of M Alignment</u> Proposed alignment will shift traffic from Washington Avenue to other areas on the campus and surrounding neighborhood streets. Connectivity between neighborhoods may be decreased as a result of this and other circumstances. Specific examples of how neighborhood connectivity will improve would be helpful.</p>
	3-33	<p>This description needs better discussion/acknowledgement of the change in traffic patterns associated with the Washington Avenue Mall impacts on the land use and social setting in the broader University neighborhoods.</p>
	3-34	<p><u>Washington Ave Bridge</u> Specific examples of how neighborhood connectivity will improve as a result of modifying the bridge would be helpful.</p>
	3-49	<p><u>University of Minnesota</u> Mariucci Hockey Arena and Williams Arena are located in the Stadium Village Area, not the Dinkytown area.</p>
	3-49	<p><u>University of Minnesota</u> Future on campus development will occur; five new biomedical research buildings and supporting infrastructure are planned and funded for the East Gateway District in the immediate future. Additional development is expected to occur over the next 20 years.</p>
3.2.3.2	3-55	<p><u>University/Prospect Park</u> The intra-campus bus system efficiently provides connector services between the East and West Bank. Specific examples of how LRT service will improve connectivity between the East and West would be helpful.</p>
	3-56	<p><u>University of Minnesota Alignment</u> Bikes should be recognized as a possible mode accommodated on the Washington Ave Mall. In addition, examples of how the mall will improve the connectivity of activities within the East Bank campus would be helpful.</p> <p>This description needs better discussion/acknowledgement of the change in traffic patterns associated with the Washington Avenue Mall impacts on the land use and social setting in the broader University neighborhoods.</p> <p><u>University of Minnesota Alignment</u> Traffic displacement may make the streets surrounding Washington Avenue unsafe for pedestrians and bicyclists.</p>



SECTION/TABLE	PAGE	COMMENTS
		<u>University of Minnesota Alignment</u> Depending on the design of the Huron Blvd/University Ave/Washington Ave intersection, connectivity between Prospect Park, Stadium Village, and the U of M campus could be worsened.
	3-56	<u>Downtown Minneapolis</u> Buses already connect the University Twin Cities Campus to downtown Minneapolis. What type of additional connections will the LRT provide?
3.2.5	3-57	<u>Mitigation</u> All traffic mitigations must be completed prior to the closure of Washington Avenue for LRT construction/operation.
3.3.4	3-61	<u>Long-Term Effects</u> The alignment of the TCF Bank Stadium was changed, which no longer required the acquisition of the four buildings discussed.
3.3.4.5	3-63	<u>U of M/Prospect Park - U of M Alignment</u> The University-owned portion of identified right of way required for the project needs to be further defined in terms of square feet. This should address whether the identified portion includes the University Transitway's right of way.
	3-63	<u>Three-Car Platforms</u> The University-owned portion of identified right of way required for the three-car platforms needs to be further defined in terms of square feet.
3.3.6	3-64	<u>Mitigation</u> A process for transfer of property ownership for the purpose of construction of mitigation measures and its subsequent return or transfer to another party should be established. For example, what would occur if the U transfers a street to project control and returns it to the city's control or reassumes control?
Table 3-9	3-67	<u>Summary of Potential Effects to Cultural Resources from the Key Project Elements – University/Prospect Park</u> Three-car platforms: Add "Bank" after "East"
Table 3-11	3-85-86	<u>Potential Impacts to Eligible or Listed National Register of Historic Places Properties – Washington Avenue Bridge, East River Parkway, Pioneer Hall</u> The University has the expectation that its historical resources will be protected. The University insists upon protecting its current and future research capabilities.  The construction of Central Corridor will require the reconfiguration of four intersections on East River Parkway: Arlington Street, Delaware Street, Harvard Street, and Fulton Street.  <u>Potential Impacts to Eligible or Listed National Register of Historic Places Properties – U of M Old Campus Historic District (the Knoll)</u> There is a lack of clarity between the statements provided in the summary table and the text as to potential for adverse effect; e.g. the summary table provides the statement "Would not be considered an adverse effect" while the text reports that "[p]otential effects have not been identified at this time."

SECTION/TABLE	PAGE	COMMENTS
Table 3-11	3-87	<u>Potential Impacts to Eligible or Listed National Register of Historic Places Properties – U of M Old Campus Historic District (the Knoll)</u> In addition to Pillsbury Drive and Pleasant Street, Arlington Street will be affected due to the closure of Washington Avenue.
3.4.3	3-100	<u>University/Prospect Park - University of Minnesota Alignment</u> Mitigations regarding visual impact to the campus and traffic displacement on and near campus as a result of LRT need to be determined, in consultation with the University, SHPO, and Mn/DOT, in greater detail. There is a lack of clarity between the statements provided in the summary table and the text as to potential for adverse effect; e.g. the summary table provides the statement “Would not be considered an adverse effect” while the text reports that “[p]otential effects have not been identified at this time.
	3-100	<u>University/Prospect Park - University of Minnesota Alignment</u> Placement of the on campus traction power substations (TPSS) needs to be determined and shared with the University. Any mitigation required as a result of the TPSS placement needs to be determined as well.
	3-101	<u>Washington Avenue Bridge</u> There is a lack of clarity between the statements provided in the summary table and the text as to potential for adverse effect; e.g. the summary table provides the statement “Would not be considered an adverse effect” while the text reports that “[p]otential effects have not been identified at this time.
3.4.6	3-104	<u>Mitigation</u> Explanation of possible mitigations with regard to University historical and cultural resources is needed.
	307-311	<u>Parks</u> A figure is needed here to relate these resources to the project.
Table 3-14	3-112	<u>Parks, Recreation Areas and Open Spaces Located Within 350 Feet of the Central Corridor LRT Key Project Elements</u> There will be short- and long-term impacts on Northrop Mall and East River Parkway as a result of LRT construction.
3.6.3	3-123	<u>University/Prospect Park - At-Grade Transit/Pedestrian Mall</u> Change “Washington Avenue” to “University Avenue” in the statement: “The proposed Stadium Village Station will be located midway between the Transitway on the north and Washington Avenue on the south.”
	3-126	<u>University/Prospect Park</u> Add a description of the Stadium Village Station
3.6.4.2	3-130	<u>University/Prospect Park - At-Grade Transit/Pedestrian Mall</u> The cultural resources section appearing earlier in the document refers to SHPO concern about visual effect and notes that a determination of effect on the Campus Mall District has not yet been made. This is not mentioned in the visual effects analysis and should be.

SECTION/TABLE	PAGE	COMMENTS
		The current municipal consent plan design of the Washington Avenue Mall encroaches on green space and eliminates established trees.
3.7.2	3-133	<u>Existing Conditions</u> UMPD provides public safety and security services on campus. They should be mentioned early on in the summary much in the same way as the Metropolitan Transit Police are handled.
3.7.2	3-133	<u>Existing Conditions</u> UMPD provides public safety and security services on campus. They should be mentioned early on in the summary much in the same way as the Metropolitan Transit Police are handled.
3.7.2.2	3-134	<u>University/Prospect Park</u> UMPD also handles crime prevention services.
	3-134	<u>University/Prospect Park</u> Last statement would be more accurate with the following edits: "A pedestrian tunnel under Washington Avenue between the parking ramp on the north and the University Medical Center on the south <b>provides an alternative for safe crossing in the vicinity of Union Street.</b> "
	3-134	<u>University/Prospect Park</u> Minneapolis Police Precincts One and Two also provide crime prevention services for Prospect Park.
	3-152	<u>Environmental Justice – University of Minnesota Alignment</u> This discussion does not address the requirements of the Environmental Justice executive order. There is no discussion or conclusion regarding the presence of low-income or minority populations nor high or disproportionate effects to those populations.
<b>CHAPTER 4 ENVIRONMENTAL EFFECTS</b>		
Table 4.4	4-31-32,	The discussion indicates that some air quality modeling has been done, and that the 2004 Metropolitan Council Transportation Policy Plan excludes the project from air quality analysis. However, the Executive Summary indicates that air quality analysis will be deferred until the FEIS. The reader would also be better informed if the five worst-case intersections were identified and could somehow compare University area intersections with those five.
4.5.4.2	4-42	<u>U of M Alignment (At-Grade Transit/Pedestrian Mall)</u> The discussion indicates that some air quality modeling has been done, and that the 2004 Metropolitan Council Transportation Policy Plan excludes the project from air quality analysis. However, the Executive Summary indicates that air quality analysis will be deferred until the FEIS. The reader would also be better informed if the five worst-case intersections were identified and could somehow compare University area intersections with those five.
4.6.5.2	4-55	<u>Noise: U of M Alignment</u> Potential noise impacts in areas receiving the redirected vehicular traffic from Washington Avenue are not addressed.

SECTION/TABLE	PAGE	COMMENTS
4.6.7.2	4-56	<u>Mitigation – Short Term</u> Construction will need to be scheduled in coordination with the University to accommodate teaching and testing schedules and other University events and research that may be impacted by noise, vibration, and electromagnetic interference.
4.7.4	4-60	<u>Existing Conditions</u> Existing Conditions section needs to be updated to reflect the current information regarding vibration levels along the Central Corridor.
4.7.4.1	4-61	<u>University of Minnesota</u> Kolthoff Hall and Molecular and Cellular Biology Building need to be added and defined as vibration-sensitive buildings on the campus.
	4-62	Future on-campus construction of the Science Classroom Building and research park in the East Gateway district could be effected by LRT vibration and should be identified as such.
4.7.5.2	4-66	<u>University of Minnesota Alignment</u> Information regarding vibration-sensitive buildings needs to be updated; specifically, Hasselmo Hall needs to be addressed as a sensitive site.
4.7.7	4-67	<u>Operational Vibration Mitigation</u> Research activities at the University must be protected—ambient vibration levels cannot be worse along than corridor than today's existing conditions.
	4-67	<u>Operational Vibration Mitigation</u> The <i>Central Corridor Draft Supplemental Environmental Impact Statement Vibration Technical Memo</i> is not in the SDEIS.
	4-68	Construction vibration will shut down research in the NMR facility in Hasselmo Hall. This impact needs to be mitigated. A possible solution is creating a temporary facility in a location far outside of the construction zone.
4.9.1.2	4-82	The University needs clarification/confirmation on whether University is considered a public utility.
4.9.3.1	4-83	<u>Electromagnetic Fields</u> There are additional University research facilities that utilize and house EMF-sensitive equipment. EMF/EMI could affect the University's research function.
4.9.3.2	4-83	<u>Existing Utilities – Water Service</u> The University needs clarification/confirmation on service to University buildings in the area of the West Bank station is privately owned.
	4-84	<u>Existing Utilities – Communication Service Lines</u> The University needs clarification/confirmation on what University communication utilities it owns/is responsible for and the implications of that ownership/responsibility.

SECTION/TABLE	PAGE	COMMENTS
4.9.4.2/5.1	4-85	<u>Long-Term EMF/EMI</u> The University could experience long-term effects on research activities from EMF/EMI if the mitigation strategies are not implemented effectively.
4.9.5.2	4-87	<u>U of M Alignment</u> The University Transitway will need to be moved to the north to accommodate the relocation of the storm drainage pipes. Clarification on the safety of running LRT on top of a storm drainage pipe needs to be provided.
4.9.6.2	4-88	Second paragraph belongs with the EMF section.
<b>CHAPTER 5 ECONOMIC EFFECTS</b>		
5.2.5	5-6	<u>University/Prospect Park</u> Biomedical research facility expansion should be added to the East Bank/Stadium Village overview. It is a legislatively-bonded, 60-acre development with an estimated value of \$250 million.
<b>CHAPTER 6 TRANSPORTATION EFFECTS</b>		
6.1.3.3	6-3	<u>Proposed Changes to AA/DEIS LPA</u> A more descriptive location of the Stadium Village Station should be provided.
	6-5	The LRT operating speed for the campus portion of the corridor, including the Washington Avenue Mall, needs to be determined. The SDEIS states the average operating speed is 16 mph. Given the nature of the Washington Avenue Mall, the operating speed must be less in order to provide a safe, pedestrian-oriented environment.
	6-5	The specifics of how the LRT and buses will interface, with each other and other modes, are not yet determined. The on-campus bus routes are not yet determined.
6.2.2	6-13	<u>Existing Conditions</u> <u>Changes at the University of Minnesota</u> The University requires clarification as to how the TCF Stadium affected the alignment for the planned Granary Rd.
6.2.3.2	6-18-20	<u>University of Minnesota Alignment</u> The University has significant concerns regarding the diversion of traffic from Washington Avenue onto other campus area streets. Many of these streets are smaller, two-lane roadways accommodating many pedestrians, bicycles, and small motorized vehicles (e.g. scooters), and vehicular traffic. Even smaller increases in vehicular traffic, within the "capacity" of the roadway, may conflict with other roadway functions and the overall campus quality. Also, the University has concerns regarding access to facilities used by the broad public and general wayfinding within the campus area. The University has numerous infrequent visitors to the campus, particularly visitors to the University medical facilities. These facilities rely on easy, convenient access for populations who may be elderly or infirm.

SECTION/TABLE	PAGE	COMMENTS
6.2.3.2	6-18-20	<p>There is not sufficient information as to where these 20,000 - 25,000 vehicles using Washington Avenue each day will divert. Will they cross the Mississippi River in other locations, or will they continue to use the Washington Avenue Bridge and divert to other campus streets? What will be the impacts to pedestrians and bicyclists as well as to the intersection capacity? Specifically what improvements are referred to on page 6-20 (e.g. left-turn lanes) and how might these improvements affect other campus resources? How will these diversions affect wayfinding and access to University facilities?</p> <p>Further, this traffic diversion is not well documented throughout the remainder of the document in terms of impacts to noise, air quality, cultural resources, visual impacts and other potential concerns. These potential impacts should be specifically discussed in terms of indirect and cumulative impacts.</p> <p><u>University of Minnesota Alignment</u> Transit mall will extend from Pleasant to Walnut. The type and location of the platforms/stations are yet to be determined.</p>
	6-18	Bikes should be recognized as a possible mode accommodated on the Washington Ave Mall.
	6-19	"Riverside Avenue" should be 4 <sup>th</sup> Street
	6-19	The University requests additional details on the "potential strategies" to improve operations at the intersections identified as experiencing unacceptable levels of service.
	6-20	4 <sup>th</sup> Street SE does not access the Washington Avenue Bridge—meaning here is unclear.
	6-20	The following should be examined as possible "distressed" intersections: University and Pleasant; 4 <sup>th</sup> Street SE and 15 <sup>th</sup> ; Church/17 <sup>th</sup> & University; Fulton & Huron.
	6-19	"Riverside Avenue" should be 4 <sup>th</sup> Street
6.2.4	6-23	Increased operating costs for the University of Minnesota shuttle bus system need to be accounted for in the traffic management plan and construction sequencing plan.
6.2.5	6-23	CCPO needs to continue to work with the University to determine on-campus traffic mitigations—some have already been identified.
6.3.3.3	6-29	<p>Parking Impacts Loading (space occupancy data) for on-street parking should be included—not all of the identified spaces are utilized.</p>
	6-29	<p>Parking Impacts Identify the number of Radisson Hotel parking spaces lost to accommodate the Beacon Street extension. The cost of replacement cost and revenue loss should be included.</p>

SECTION/TABLE	PAGE	COMMENTS
6.3.3.6	6-31	A circulation and access plan should be developed for on-campus ground floors to direct pedestrians to specific crossings.
6.3.5	6-32	Mitigations on campus need to account for pedestrians, bicycles, and vehicular access to parking facilities.
	6-32	The University has concerns with the mitigation measures planned for the Washington Avenue Mall area. More detail and collaboration is needed in this area.
6.3.5	6-32	The University has concerns with the mitigation measures planned for the Washington Avenue Mall area. More detail and collaboration is needed in this area.
<b>CHAPTER 7 SECTION 4(f) EVALUATION</b>		
Table 7-1	7-5-7-8	<u>Preliminary Review for Potential Use of Historic Property and related text</u> This is a confusing, and potentially inaccurate, summary of 4(f) use decisions, relating the determination entirely to the Section 106 Finding of Effect. Further, the lack of determination of effect regarding cultural resources makes it difficult for the reader to comment on these issues.
7.2.2	7-9	Any mitigations required on campus must be completed by the project as project costs.
7.2.3	7-12	Changes in the Central Corridor design had shifted impacts to the University's property.
7.4	7-13	The agency coordination meeting focused on the Campus' Historic Mall region—there has not been coordination on 4f impacts of parklands on/off University property. This discussion should include other alternatives that would avoid 4(f) resources, and why those alternatives were determined infeasible.  This paragraph appears to imply that a Programmatic Agreement addressing historic properties would also address other 4(f) resources. Please clarify.
<b>CHAPTER 9 INDIRECT AND CUMULATIVE IMPACTS</b>		
9.2.4	9-3	Campus development of the East Gateway district will extend beyond 2009.
Table 9-2	9-5	Opus development on Washington Avenue between Oak and Ontarios should be added. Multimodal transportation hub development should include a planned bike center.
<b>CHAPTER 10 EVALUATIONS OF ALTERNATIVES</b>		
Table 10-1	10-3	EMI should be added under "Goal 2: Preserve and Enhance Communities and Support Healthier Environments" where vibration is represented.
	10-3	On campus mitigations for closure of Washington Avenue should be added in "Goal 3: Improve and Increase Transportation and Mobility."
10.3	10-5	<u>Issues to be Resolved</u> This area is lacking in necessary detail. All the specific issues regarding transportation impacts, including bicycles and pedestrians, traffic rerouting, etc. should be detailed here.

SECTION/TABLE	PAGE	COMMENTS
<b>Appendix G Northern Alignment Feasibility Study</b>		
		<p>While the University is not submitting a detailed, point-by-point, analysis challenging factual components of the CCPO's letter to the FTA regarding the Northern Alignment study, the University believes that the CCPO takes liberties in offering general terminology such as "may," "likely," "appears," "underestimated," and "unusual" to describe specific technical data. The CCPO letter to the FTA does not present an accurate portrayal of the technical findings and/or the level of required analysis performed.</p>





Natural Resources Conservation Service  
375 Jackson Street, Suite 600  
St. Paul, MN 55101-1854

Phone: (651) 602-7900  
FAX: (651) 602-7914

File Code: 190-15-13

July 8, 2008

IN REPLY REFER TO: Central Corridor Light Rail Transit Project SDEIS, Hennepin and Ramsey Counties, MN

Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave. North, Suite 200  
St. Paul, MN 55104

Dear Ms. O'Brien:

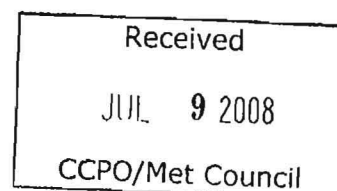
The United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), thanks you for the opportunity to review the subject Light Rail (SDEIS).

Since your project will not affect prime agricultural land within the proposed Central Light Rail Transit Project, linking downtown Minneapolis and St. Paul in Hennepin and Ramsey Counties, MN, this will preclude the need for any further action on this project by our agency, the NRCS, as required by the federal Farmland Policy Protection Act (FPPA). If you have any further questions concerning this matter, please call me at 651-602-7883.

Sincerely,

A handwritten signature in black ink, appearing to read "William E. Lorenzen", written in a cursive style.

WILLIAM E. LORENZEN  
Environmental Review/Justice Coordinator





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

AUG 27 2008

REPLY TO THE ATTENTION OF

E - 19J

Marisol Simon  
Regional Administrator, Region 5  
Federal Transit Administration  
200 West Adams Street, Suite 300  
Chicago, IL 60604

**Re: Comments on the Supplemental Draft Environmental Impact Statement  
for the Minneapolis-St. Paul, MN Central Corridor Project, CEQ No. 20080268**

Dear Ms. Simon:

In accordance with U.S. Environmental Protection Agency responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), we have reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Minneapolis - St. Paul, MN Central Corridor Project. This project proposes to create a new light rail transit service between the downtowns of Minneapolis and St. Paul, Minnesota, while serving the University of Minnesota campus and the neighborhoods along University Avenue. This will be the second branch of the Twin Cities light rail system.

EPA participated in an early scoping meeting for this Central Corridor project in June 2001. We provided comments on the Draft Environmental Impact Statement (DEIS) on June 5, 2006. Scoping comments for this SDEIS were made on March 18, 2008. This letter provides comments based upon our review of the SDEIS and participation in an August 6, 2008 site visit. The SDEIS presented important project information that was not provided in the DEIS, including changes to the Local Preferred Alternative. Our comments on the DEIS raised concerns on the following issues: traffic impacts, especially in environmental justice (EJ) communities; hazardous waste sites; noise; karst geology and related ground water; air; and historic properties. We also requested an explanation why some alternatives were retained and others dropped.

**EPA concerns with the DEIS that have been fully or partially addressed**

**Traffic impacts**

The Metropolitan Council (MC), as project manager, created an eight-member community outreach team, representing the principal language and ethnic groups in the EJ

communities to be served by this project. In response to public concerns about vehicle and pedestrian connectivity across University Avenue, the project has increased the frequency of stop-light-controlled intersections to quarter-mile intervals and the frequency of pedestrian crossings of the rail line to eighth-mile intervals. These changes and their impacts were not presented in the SDEIS, but should be discussed in the Final EIS (FEIS). We understand that additional Transportation Management System efforts will divert traffic from some of the busiest intersections along the proposed route, and will facilitate train and emergency vehicle movements through the Central Corridor traffic lights. However, these changes and their impacts were not evaluated in the SDEIS and should be in the FEIS.

Reacting to community input, the SDEIS analyzed the impact of three additional stations along University Avenue to better serve these communities. The SDEIS indicated that some preliminary infrastructure will be included in the initial project design to accommodate the possible future construction of these additional stations. The FEIS should describe this preliminary infrastructure. The relocation of the University West Station and realignment of track serving that station, as presented and analyzed in the SDEIS, will afford easier access and better service to the EJ and university communities in that vicinity. The SDEIS provided an upgraded traffic analysis to the year 2030, and determined a need to increase train capacity to three cars and extend station platforms to accommodate these longer trains. The increased train and station lengths are analyzed in the SDEIS.

#### Noise

The relocation of the Capital Campus station and the track realignment to 12th Street has alleviated our noise issues at those locations. Public concerns over disruption of a major utility center at the corner of 4th and Cedar Streets in St. Paul may be resolved by the proposed realignment of the track diagonally through the middle of the adjacent block and the creation of a transit center mall, combining two stations into one at this location. This revision would reduce the potential noise (wheel squeal) at that location. Because this revision was presented in the SDEIS as a concept with only a cursory impact analysis, it should be fully described and analyzed in the FEIS.

#### Karst geology and related ground water

The MC undertook soil and subsurface geological studies in several areas suspected of having potential karst conditions. Those studies determined that karst conditions do not exist in those areas. This resolves our concern regarding ground water protection in those areas.

#### **EPA concerns with the DEIS that are unresolved**

#### Alternatives

We reiterate our DEIS comment that the rationale for retaining or dropping alternatives be clearly explained in the FEIS.

Traffic impacts

The revised plan, as described in the SDEIS, will still result in a worse Level of Service (LOS) at fourteen intersections, many of them in the low income neighborhoods. This is an EJ issue as well as a safety concern.

Hazardous waste sites

A number of potential hazardous waste sites were identified in the SDEIS, both in and adjacent to the project right of way, with potential to be directly impacted by the project's construction. The FEIS should specifically delineate these sites and their contaminants, and discuss what measures will be taken to deal with them. Other sites within the project area would potentially be disturbed due to project-induced development. Since one of the stated project goals is to induce secondary transit-oriented developments (TOD) for economic enhancement along this corridor, FTA and the MC should consider such induced impacts in the FEIS. The FEIS should also discuss options for financing the assessment, cleanup, and redevelopment of such TOD-candidate sites.

Air

This project must demonstrate transportation conformity with the State Implementation Plan for air quality in the Minneapolis-St. Paul metropolitan area. Air conformity modeling and determinations should be presented in the FEIS using current air quality data and approved methodologies.

Historic properties

Subsequent to the DEIS, the project has identified additional properties in the project area that may be potentially eligible for listing on the National Register of Historic Places. We reiterate our earlier request that the final Memorandum of Agreement with the State Historic Preservation Office, addressing all historic properties in the project area, be included in the FEIS, once signed.

**EPA concerns related to project changes as presented in the SDEIS**

Northern alternative

The University of Minnesota proposed a northern alternative to service the campus and analyzed its impacts. The MC considered this alternative and determined that it would be less effective in meeting the project purpose and need. Subsequently, a Memorandum of Understanding was negotiated with the University to affirm the University's support for the preferred alternative designated in the SDEIS. The SDEIS provided a clear explanation of why this alternative was dropped.

Parking

The SDEIS describes the loss of parking spaces along and adjacent to the project corridor that are attributable to the project. Most of these losses will occur in the EJ communities. No

parking replacement or mitigation for the communities or local businesses is presented. The FEIS should present what mitigation will be provided.

Washington Avenue Bridge

The SDEIS indicated that the remodeling and restructuring of the Washington Avenue Bridge is proposed to be accomplished by working from the existing roadway, and not by working directly in the Mississippi River. However, those engineering and associated historic preservation measures have not actually been worked out, so potential impacts can not be definitively concluded. This needs to be resolved and clearly presented in the FEIS. Mississippi River wildlife and their habitat upstream and downstream of the bridge were alluded to in the SDEIS, with the assumption that these species therefore must pass through the Washington Bridge area. The project should study what species are in the vicinity of the bridge and whether any of those species require protection during construction and/or operation of the project. Please present that information in the FEIS. Although this bridge has an upper pedestrian walkway that is covered, this does not preclude all runoff impacts. Salting or other ice removal operations on this bridge and the resulting impacts, including to salt-sensitive species, should be fully assessed in the FEIS.

Station modifications

Two new pedestrian mall stations are proposed in the SDEIS, one at the University center and one in downtown St. Paul. These are significant concepts that were just recently incorporated into the project. However, no comprehensive impact assessment of them was provided in the SDEIS. A full assessment of their impacts should be included in the FEIS.

The relocation of the Stadium Village Station and modifications to the track pathways to service this station were necessary due to construction of the new University TCF Bank Stadium upon the former proposed station site. This station is also being considered as part of a University Transit Center. The FEIS should describe these changes in terms of the project purpose and need, including how these changes affect the stated project goal of serving the EJ communities along University Avenue.

The relocation and realignment of the Rice Street Station and track will optimize bus connections and reduce traffic impacts related to road geometry, but increase impacts to the Leif Ericson Park. Based upon Figures 2-7, 3-2-3, 3-4-2, 7-1, and the statement on page 7-13 that coordination with park officials is ongoing, the SDEIS implies that impacts to this park will occur, but those impacts are not adequately described or analyzed, nor are any mitigation measures proposed. The FEIS should address these issues.

Vibration

Vibration impacts are now anticipated in several University laboratory buildings and are noted in the SDEIS as a new concern. The extent of these impacts and possible mitigation being negotiated with the University should be presented in the FEIS.

Electromagnetic Force

The SDEIS indicated that electromagnetic forces related to the traction power stations and catenary overhead power lines are potential impacts that will be studied and presented in the FEIS. This issue should be presented in a way that will be understandable by the general public.

Maintenance and Storage Facility

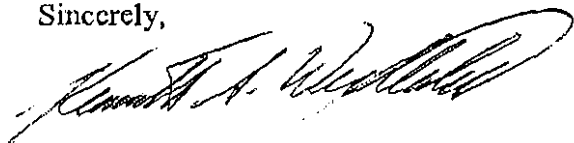
The project will require a new maintenance and storage facility to accommodate the additional train cars for this project. It will be located on a former railroad site, along a new proposed extension of track east of the station proposed at St. Paul Union Station. This light rail station could eventually serve a future St. Paul Transportation Center on the south side of Union Station. This site presents potential hazardous waste issues. The FEIS should evaluate and discuss current conditions and the potential impacts of the proposed maintenance and storage operations.

Conclusions

We are pleased that several of the concerns we raised in our review of the DEIS have been resolved in the SDEIS. The SDEIS has not resolved some earlier concerns regarding this proposed project related to explanation of alternative decisions, traffic impacts, hazardous waste, air quality, and historic properties. We are raising additional concerns based on new information presented in the SDEIS or subsequently during the August 6, 2008 site visit, including parking, the Washington Avenue Bridge remodeling, station modifications, vibration, EMF, and a new maintenance and storage facility. We find that the SDEIS is not a stand-alone document, depending heavily upon reference to the DEIS and other documents, some of which are still to be created. A significant amount of information is not yet available for public comment and is promised in the FEIS. We therefore retain our rating of "EC-2" (environmental concerns, insufficient information) for the SDEIS. We refer you to the enclosed Summary of Rating Definitions Sheet for a fuller definition. This rating and a summary of our comments will be published in the Federal Register.

We appreciate the opportunity to review and comment on this SDEIS for the Central Corridor Project. Should you have any questions regarding these comments, please feel free to contact me or Norm West of my staff at 312-353-5692 or west.norman@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Science, Ecosystems and Communities

Cc: Mark Fuhrmann, Project Director, Metropolitan Council

## 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 date, 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.

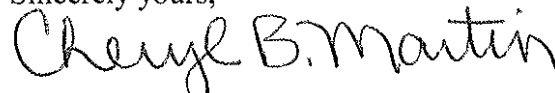
#### Category 3-Inadequate

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

We thank you for the opportunity to comment on the SDEIS. Please feel free to contact me with any questions regarding our review of the document and future coordination. I can be reached at (651) 291-6120.

Sincerely yours,



Cheryl B. Martin

Environmental Engineer

CBM/jer

cc: 1 FTA – Bill Wheeler  
1 Martin  
1 RF  
DMS – “FHWA Comments on Central Corridor SDEIS”





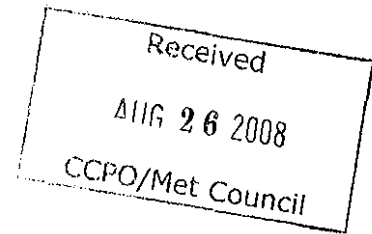
U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Great Lakes Region  
Minneapolis Airports District Office  
6020 28<sup>th</sup> Ave S, Room 102  
Minneapolis, MN 55450

August 21, 2008

Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave North, Suite 200  
St Paul, MN 55104



Re: Central Corridor Light Rail Transit Project Supplemental Draft EIS

Dear Ms. O'Brien:

The Minneapolis Airports District Office has no objections to the proposed Central Corridor Light Rail Transit project provided:

1. The Federal Aviation Administration (FAA) is notified of construction or alterations as required by Federal Aviation Regulations, Part 77, Objects Affecting Navigable Airspace, Paragraph 77.13. Please note that Part 77 includes temporary construction vehicles and equipment. The Notice of Proposed Construction or Alteration Form 7460-1 may be obtained and filed online at <https://oiaa.faa.gov> or mailed to:  
Express Processing Center  
FAA Southwest Regional Office  
Obstruction Evaluation Service, ARJ-32  
2601 Meacham Boulevard  
Fort Worth, TX 76137-0520
2. The FAA technical operations are contacted to identify any possible impacts to aircraft navigation and/or communication equipment. The MSP Technical Support Center Manager can be reached at (952) 997-9261 or in writing at:  
FAA – Minneapolis Technical Support Center  
Attn: MSP TSCM  
14800 Galaxie Ave, Suite 300  
Apple Valley, MN 55124

If not already included in your distribution list, please consider giving St Paul Downtown Airport an opportunity to provide input and comments.

I appreciate the opportunity to comment on the draft EIS for the proposed Central Corridor Light Rail Transit Project. Please contact me if you have any questions or need further information.

Sincerely,



Kandice Krull  
Environmental Protection Specialist  
FAA - Minneapolis Airport District Office  
612-713-4362  
Kandice.Krull@faa.gov



U.S. Department  
of Transportation  
**Federal Highway  
Administration**  
Minnesota Division

380 Jackson Street  
Gallier Plaza, Suite 500  
St. Paul, MN 55101-4802

651.291.6100  
651.291.6000 fax

[www.fhwa.dot.gov/mndiv](http://www.fhwa.dot.gov/mndiv)

August 25, 2008



Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave North, Suite 200  
St. Paul, MN 55104

**Re: Comments on Central Corridor  
Light Rail Transit SDEIS**

Dear Ms. O'Brien:

The Federal Highway Administration (FHWA) Minnesota Division Office, as a cooperating agency for the Central Corridor Light Rail Transit (LRT) Supplemental Draft Environmental Impact Statement (SDEIS), offers the following comments on the document:

1. The SDEIS is unclear as to possible effects to the Interstate system (I-35W, I-35E and I-94) due to the LRT construction and operation. We request a meeting with FHWA staff to better understand the potential effects to Interstate operations and right of way from the project.
2. The FHWA is the lead federal agency for the development of the Union Depot multi-modal transit hub. It is critical that the Central Corridor LRT proposal and Union Depot proposal are consistent in describing the proposed projects. We recommend that close coordination occur between our offices to ensure consistency between the two projects. The proposed use of the Union Depot by the Central Corridor LRT will help define the purpose and need for the Union Depot multi-modal facility.

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

3. We recommend that the FHWA be included in the development of a traffic management plan as part of the mitigation for traffic impacts.



**Comments from Community  
Groups, Non-Profits, and Private  
Entities**

**Comments submitted on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor Light Rail Transit Project, located in Minneapolis and St. Paul, MN**

**From: Alliance for Metropolitan Stability**  
**2525 E. Franklin Ave.**  
**MPLS, MN 55406**  
**Contact: Russ Adams, Executive Director**  
**[russ@metrostability.org](mailto:russ@metrostability.org)**  
**612-332-4471**

**August 14, 2008**

The Alliance for Metropolitan Stability is a broad coalition of 20 faith-based, social justice and environmental [organizations](#) advocating for public policies that promote equity in land use and urban development.

The Alliance for Metropolitan Stability is a member of the Transportation Equity/Stops for Us Coalition which represents a total of 67 constituency-based and/or citizen participation organizations. By invitation of University Avenue community organizations and as directed by the program committee of our board of directors, we have supported coalition efforts along University Avenue in response to the future development of the Central Corridor Light Rail Transit Project.

Our collective focus is to ensure that three additional stops are built at Hamline Ave., Western Ave. and Victoria Street by the completion of the line. These stops are part of a larger equity strategy for the future development along University Avenue.

**A case for equitable outcomes by building additional stations at Hamline Avenue, Western Avenue and Victoria Street:**

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

Based on census statistics from 2000, the Minnesota Center for Environmental Advocacy found that the population at (around or near or adjacent to) these stations is 82 percent minority versus an average 41 percent minority population near all other stations (see attached spreadsheet Central Corridor LRT Minority Populations by Stations Sheet 1). These communities are also living at 70 percent of the median income of Ramsey County (see attached spreadsheet Central Corridor LRT Median Household Income by Stations Sheet 2).

---

<sup>1</sup> Central Corridor LRT Project SDEIS pg 3-138.

As stated in the SDEIS, “22 percent of the households in the Study Area are without a car, thus, a substantial percentage of the population depends on transit to get to work, health care facilities, shopping destinations, schools, and recreational facilities.”<sup>2</sup>

Also documented in the SDEIS is the Central Corridor Population by Segment is that the Midway East Segment has the highest population density of any other segment along the line.<sup>3</sup>

These statistics demonstrate the need to build stops at Hamline, Victoria and Western to serve the densely populated, minority, low-income, transit-dependent communities that will otherwise not experience the benefits of the Central Corridor LRT. The current plan for stations does not adequately meet the stated purpose and need to “provide better transit service and capacity to the diverse population of existing and future riders in the corridor.”<sup>4</sup>

Furthermore, the current project scope of the Central Corridor LRT does not meet the standard for addressing the three fundamental environmental justice principles listed on the Environmental Justice web site of the U.S. Department of Transportation’s web site. These principals are:<sup>5</sup>

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

A letter sent by Kenneth Westlake, Supervisor NEPA Implementation, U.S. Environmental Protection Agency Region 5, to Kathryn O’Brien, Project Manager of the Central Corridor Project, on March 18, 2008, states “Three additional stations are being considered to serve the environmental justice neighborhoods at Hamline Avenue, Victoria Street and Western Avenue in St. Paul. A Central Corridor website...indicates these may be dropped from consideration due to cost factors. The SDEIS should provide a clear explanation of what factors...justify which stations are retained for detailed analysis or dropped from further consideration.”<sup>6</sup> A clear explanation of these factors has not been articulated in the Central Corridor LRT project SDEIS.

---

<sup>2</sup> Central Corridor LRT Project SDEIS, June 2008, pg 1-8.

<sup>3</sup> Central Corridor LRT Project SDEIS, June 2008, Table 1-2 pg 1-9 and Table1-3 pg 1-11

<sup>4</sup> Central Corridor LRT Project SDEIS, June 2008, pg 1-4.

<sup>5</sup> “An Overview of Transportation and Environmental Justice,” U.S. Department of Transportation, found at <http://www.fhwa.dot.gov/environment/ej2000.htm> , retrieved 8/8/08.

<sup>6</sup> Central Corridor website link Record of SDEIS Scope Comments received, pgs 56-57, retrieved 8/8/08

## Community Involvement vs. Community Influence

“To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process,” as stated on the Transportation and Environmental Justice web page of the U.S. Department of Transportation, requires “properly implemented, environmental justice principles and procedures (to) improve all levels of transportation decision making. This approach will:

- Make better transportation decisions that meet the needs of all people.
- Design transportation facilities that fit more harmoniously into communities.
- Enhance the public-involvement process, strengthen community-based partnerships, and provide minority and low-income populations with opportunities to learn about and improve the quality and usefulness of transportation in their lives.
- Improve data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts on minority and low-income populations.
- Partner with other public and private programs to leverage transportation-agency resources to achieve a common vision for communities.
- Avoid disproportionately high and adverse impacts on minority and low-income populations.
- Minimize and/ or mitigate unavoidable impacts by identifying concerns early in the planning phase and providing offsetting initiatives and enhancement measures to benefit affected communities and neighborhoods.”<sup>7</sup>

The Metropolitan Council has provided many opportunities for community involvement throughout the planning process for the Central Corridor LRT. However, although the Metropolitan Council has dedicated resources to community involvement, this involvement has lacked full and fair influence in the Central Corridor planning process. As was commented by Anne White, Co-Chair of the District Council Collaborative, Community Advisory Committee member and active participant in the Transportation Equity/Stops for Us Coalition, in her testimony on the SDEIS, “there are several aspects of the current Public Engagement Process that we find lacking.” To illustrate this issue, she points out that the CAC has not been allowed to forward recommendations in the form of motions to the Central Corridor Management Committee, communication between CAC members has been discouraged, and there has been overall lack of responsiveness and transparency on the part of Metropolitan Council Central Corridor staff towards specific details and concerns of the CAC.<sup>8</sup>

We think it is also important to contrast the significant staff resources of the Metropolitan Council and the Northern Alignment Steering committee<sup>9</sup> which were dedicated to

---

<sup>7</sup> “An Overview of Transportation and Environmental Justice,” U.S. Department of Transportation, found at <http://www.fhwa.dot.gov/environment/ej2000.htm> , August 11, 2006 (August 7, 2008).

<sup>8</sup> Union Park District Council Testimony on the Supplemental Draft Environmental Impact Statement August 2008.

<sup>9</sup> Comprised of technical representatives from University of Minnesota, Metropolitan Council, Hennepin County Regional Rail Authority, Ramsey County Regional Rail Authority, Minnesota Department of Transportation, City of Minneapolis, and City of St. Paul

resolving the complex issues with University of Minnesota Alignment with the lack of staff resources dedicated to resolving the complex issues of transportation equity in the Midway East Segment of the Central Corridor LRT. The Northern Alignment Steering committee created an analysis of the alternative route of the Northern Alignment and traffic mitigation studies that included: four traffic studies, analysis of electromagnetic impacts, design criteria and an environmental analysis which resulted in a \$24.6 million mitigation package for the University of Minnesota and its surrounding area. No comparable resources have been dedicated to mitigating the concerns of the environmental justice communities of east University Avenue.

Community influenced the city of St. Paul when they unanimously passed a resolution on February 6, 2008, affirming the importance of stops at Hamline Ave., Western Ave. and Victoria Street and calling on the Metropolitan Council to take action on “the deliberate pursuit of every opportunity in phase one to include stops at Hamline, Western, and Victoria Avenues along the proposed Central Corridor light rail line.”<sup>10</sup>

Also, the community successfully influenced the Ramsey County Regional Rail Authority to pass a similar resolution stating “The construction of at least one of these stations is Ramsey County’s highest priority during this phase of building the line” (Unanimously passed by the Ramsey County Regional Rail Authority, 2/12/08).

**The Alliance for Metropolitan Stability calls on the Metropolitan Council to acknowledge and resolve the disparities in the Central Corridor LRT Line by including three stations at Hamline, Victoria, and Western.**

---

<sup>10</sup> City of Saint Paul, Minnesota Resolution 08-108, found at <http://www.stpaul.gov/index.asp?nid=2128> (8/8/08).





484	656	1140			
1571	799	2370			
2666	1072	3738			
1234	467	1701			
2024	500	2524			
16397	11170	27567	1544	6787	8331
Percent Minority		40.52%			81.47%

August 25, 2008

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Ave. North  
Saint Paul, MN 55104

Dear Ms. O'Brien,

The following comments are being submitted by the Aurora/St. Anthony Neighborhood Development Corporation (ASANDC) in response to the Supplemental Draft Environmental Impact Statement for the Central Corridor Light Rail Transit Project. ASANDC has served, engaged, and advocated for low-income communities around University Avenue for 27 years. Among our organizational goals is to work to ensure that the well-being of these communities are properly considered in public policy and planning decisions that will impact their quality of life. Accordingly, assuring that NEPA regulations are upheld in the CCLRT project—and that all disproportionate impacts on low-income communities of color are considered and mitigated—is in accordance with our mission.

Through both our internal analysis of CCLRT plans and our community outreach regarding the project, we have identified several mitigation strategies that would address some of the noteworthy disproportionate impacts this project—as currently designed—is likely to have on the low-income communities we serve. We will identify some of these solutions below, but first must address Section 3.8.6 of the SDEIS, which makes the (apparently unsubstantiated) statement that “minority or low-income populations within the study area are not subject to any disproportionate impacts associated with the development of the Central Corridor LRT; furthermore, the benefits of the project are fairly distributed. No mitigation is proposed at this time.”

We believe that this statement is inaccurate, and accordingly, that the SDEIS violates environmental justice standards required by state and federal law. Consideration is not given to the following disproportionate impacts or inequitable distribution of benefits:

- Access to LRT stations is unequally distributed. Stations in our community are spaced at one-mile intervals, while they are spaced at half-mile or quarter-mile intervals along other parts of the corridor. While 41 percent of residents within one quarter mile of current stations are people of color, 82 percent of residents within one quarter mile of the omitted stations at the Western, Victoria, and Hamline intersections are people of color. Regardless of CEI consideration, it is unreasonable to regard these facts and still reach the conclusion that benefits are equally distributed. The SDEIS states on page 3-5 that “neighborhoods have expressed concern about gentrification resulting from potential stations” and uses this statement as one justification for their exclusion, which is not representative of cumulative community feedback. During the public comment period in February 2008, support of the inclusion of the stations was by far the most frequent comment.

- The Route 16 bus service is utilized by an especially high number of low-income people, and thus the remaining plans for reductions in its service will disproportionately affect a low-income population. This statement is especially true given the limited access that many low-income residents would have to the CCLRT given the spacing of stations. At a December meeting of the Central Corridor Community Advisory Committee, a Metropolitan Council staff person indicated that some residents would actually be suffering a net loss in transit, although she did not clarify that these residents would be disproportionately of color.
- An especially high number of small businesses along the east end of the corridor are owned by minorities. These businesses are more likely to be impacted by project construction and loss of parking incurred at completion. They are less likely to survive the loss in business that regularly occurs when a commercial corridor is under construction and more likely to be reliant on the on-street parking that is, for the most part, being permanently lost due to LRT construction. These potential impacts were not analyzed.
- Analysis was not given to the disproportionate impacts this project may have regarding local property taxes, and no mitigation was considered. If property taxes were to increase, which is suggested in the SDEIS on pages 5-2 in the first full paragraph, low-income residents of the corridor would be disproportionately impacted because they are less likely to have disposable income to cover these increases, and as a result they would be more likely to be displaced.

These failures to analyze disproportionate impacts and resulting mitigation, and the corresponding breach of environmental justice law, are coupled with what appears to be a misunderstanding of the term “disproportionate impact” itself. On page 3-138 of the SDEIS, it is stated that “there will be a variety of short-term construction impacts, as well as long-term impacts such as loss of on-street parking and changes to property access that would be experienced by all residents and users of the corridor. However, these impacts are not disproportionately borne by sensitive communities; rather they are borne by all communities along the corridor.” As shown in the examples above, this statement is disputable at best, but furthermore, it fails to interpret Executive Order 12898 accurately.

Executive Order 12898 states that “disproportionate or adverse impacts to minority or low-income populations are defined as those impacts that are predominantly borne by a minority or low-income population and *are more severe or greater in magnitude than the impact felt by the community at-large.*” As SDEIS tables 3-15 and 3-16 show, the minority population and the population below the poverty level in the corridor area is significantly higher than in the entirety of Ramsey and Hennepin Counties. Therefore, disproportionate impacts of the CCLRT project will by their very nature have a disproportionate impact on low-income and minority communities of Hennepin and Ramsey Counties. The statement from page 1-138 quoted in the prior paragraph does not account for this aspect of the Executive Order.

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

Some potential mitigation strategies on the part of the Metropolitan Council follow:

- The inclusion of LRT stations at Western, Victoria, and Hamline Aves.
- The retention of Route 16 bus service at existing levels.
- The provision of mitigation funds for small businesses suffering impacts due to construction and loss of parking and, perhaps, to incubate new small and/or minority-owned businesses.
- A legally binding agreement between the Metropolitan Council, the City of Saint Paul, Ramsey County, and community members and organizations assuring that reasonable mitigations will be provided with the construction of the project.

ASANDC is appreciative of the opportunity to provide comment and we anticipate your response. If any clarification is needed, you may contact Community Development Assistant Daniel Kravetz at 651-222-0399 x102 or at [daniel@aurorastanthy.org](mailto:daniel@aurorastanthy.org).

**BONNER & BORHART** LLPThomas F. DeVincke, Esq.  
Direct Dial No. 612/313-0735

August 14, 2008

Ms. Kathryn L. O'Brien, AICP  
Project Manager  
Central Corridor Project Office  
540 Fairview Avenue North  
Suite 200S  
St. Paul, MN 55104Mr. David Werner  
Federal Transit Administration  
Region V  
200 West Adams Street  
Suite 320  
Chicago, IL 60606

Re: *Supplemental Draft Environmental Impact Statement for the Central Corridor Project*

Dear Ms. O'Brien and Mr. Werner:

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

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

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

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

high. The Final Order states that "disproportionately high and adverse effect on minority and low-income populations" means that either the effects are

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

In this case, DOT has failed to recognize that environmental justice requirements are triggered so long as the effect of the CCLRT are "predominately borne by a minority population and/or low-income population." This failure may be based on your misunderstanding of the Final Order (and misquote of the Final Order) that is set forth on page 3-138 of the SDEIS. There, under section 3.8.2, you state that disproportionate or adverse impacts to minority or low-income populations are defined as those impacts that are predominantly borne by a minority or low-income population **AND** are more severe or greater in magnitude than the impact felt by the community at-large." (Emphasis added). Your addition of the conjunctive in lieu of the disjunctive "or" has resulted in your erroneous conclusion that simply because the benefits of the project are borne by all communities along the corridor, no special mitigation measures beyond those already proposed are necessary. See Summary of Key Findings 3.8.1.

There is no dispute in this case that in fact the Central Corridor is dominated by people of color and low income communities. In fact, based upon independent research, my clients have determined that within a quarter mile radius of the proposed stations, approximately 40% of the population is of color. Further, within a quarter mile radius of those corridor areas that are not intended to have a station, approximately 80% of the population is of color. Moreover, both the DEIS and SDEIS contain ample proof that in fact the impacted communities are disproportionately minority and/or low-income. Accordingly, your conclusion that this project does not trigger Environmental Justice requirements is clearly erroneous.

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

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

- (1) a substantial need for the program, policy or activity exists, based on the overall public interest; **and**
- (2) alternatives that would have less adverse effects on protected populations and that still satisfy the need addressed by the project either:

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

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

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

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

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

Given that aforementioned reality that this project is cited in a low-income and minority community, it is clear that you must ensure that you consider mitigation before moving forward with the LPA. Possible mitigation measures that should be considered include, but are by no means limited to:

1. Funds set aside to address business interruption;



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

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

### Conclusion

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

We recognize the requirement, under the National Environmental Policy Act, for disproportionate impacts to low-income and minority communities to be disclosed for a federally-funded transit project to go forward. We are certain that, in disputing the claim made by the Metropolitan Council that 'the benefits of the project are fairly distributed' and its sufficiency in addressing our issues, we are upholding the law as it is intended. Until the Metropolitan Council agrees to address our concerns adequately and give our community equal benefits, we oppose the Central Corridor Light Rail Transit Project and will stand against its construction through our community.

I ask that you respond in writing to my clients' concerns no later than September 1, 2008. I look forward to hearing from you.

Very truly yours,



Thomas F. DeVincke

TFD



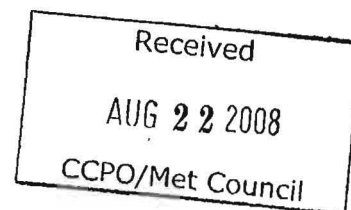
# Capitol Region Watershed District

1410 Energy Park Dr., Suite 4 St. Paul, MN 55108

Phone: (651) 644-8888 Fax: (651) 644-8894 [www.capitolregionwd.org](http://www.capitolregionwd.org)

August 20, 2008

Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Avenue North, Suite 200  
St. Paul, MN 55104



RE: Central Corridor Light Rail Transit Project – Supplemental Draft Environmental Impact Statement

Dear Ms. O'Brien:

Capitol Region Watershed District has conducted a review of the Central Corridor Light Rail Transit Project – Supplemental Draft Environmental Impact Statement. We have noted several of the recommendations from our June 2, 2006 letter have been incorporated into the Supplemental Draft and want to thank you for considering our earlier comments. Based on our review of the Supplemental Draft we offer the following comments:

The Capitol Region Watershed District adopted Rules in September 2006 and as such the Central Corridor Project will be required to obtain a permit from the CRWD. These rules, regardless of which alternative is selected, will require the project to incorporate both short-term construction stormwater BMPs and permanent, post construction volume reduction and water quality treatment BMPs.

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

We look forward to working with your staff to develop effective stormwater treatment practices for this project. If you have any question please contact The District at (651) 644-8888.

Sincerely,

Robert P. Piram  
President, Capitol Region Watershed District



## CapitolRiver Council

District 17

332 Minnesota Street Suite W-122 Saint Paul, MN 55101 (651) 221-0488 fax (651) 221-0581

Website: [www.capitolrivercouncil.org](http://www.capitolrivercouncil.org) E-mail: [info@capitolrivercouncil.org](mailto:info@capitolrivercouncil.org)

August 19, 2008

Kathryn O'Brien  
Manager, Environmental Analysis  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104

RE: CapitolRiver Council's Notes on 07-22-08 Meeting on SDEIS

Dear Ms. O'Brien

On July 22<sup>nd</sup>, 2008, CapitolRiver Council held a meeting of stakeholders to comment on the SDEIS. Those attending the meeting included downtown residents as well as representatives of two churches on Cedar Avenue and MPR, all of whom are located along the Cedar Street stretch of the proposed LRT. Comments were solicited from the attendees, and are included.

Some of the comments were not germane to the SDEIS, since they deal with issues of alignment, noise, and vibration along Cedar Street, which was part of the original DEIS. Nevertheless, we have included them as well on a separate page, since they reflect a need for more communication from the LRT Project Office to downtown stakeholders. Some of the additional comments are also germane to mitigation efforts that are currently under way. .

CapitolRiver Council will be following the progress of the LRT Project with hope that many of the Cedar Street issues can be resolved with good engineering. We are particularly concerned about the issues of parking during funerals and access for disabled churchgoers, and are hopeful they can be fully addressed and mitigated, since, to our eyes, an engineering solution is not readily visible.

CapitolRiver Council will be submitting its own comments on the SDEIS in a separate mailing. The comments from the July 22<sup>nd</sup> meeting are noted below.

Thank you.

A handwritten signature in black ink, appearing to read "John C. Schachterle", written over a horizontal line.

John C. Schachterle

Director

CC: Councilperson Dave Thune  
Lucy Thompson, PED  
Mark Fuhrman, CCLRT Project Manager  
Dana Dellis, CCLRT Community Outreach Coordinator, Downtown  
Nick Kaster (Outside Counsel for St. Louis Church)  
Paul Morrissey (Priest at St. Louis Church)  
Tom Kigin (VP/General Counsel at MPR)  
Margaret Ann Hennen (Communications Director at MPR)  
David Colby (Pastor at Central Presbyterian Church)  
Jim Schueppert (Member of St. Louis Church)  
Craig Rafferty (RRTL Architects)  
Chip Lindeke (RRTL Architects)  
CRC Board Members  
Bob Spaulding (CRC Representative to DCC)  
Paul Mohrbacher (Co-Chair, City's CCLRT Downtown Task Force)

## CapitolRiver Council

### Comments to SDEIS – July 22<sup>nd</sup> Stakeholders Meeting

**Attending:** Paul Mohrbacher (Co-Chair, City's CCLRT Downtown Task Force), Lucy Thompson (PED), Larry Englund (District 17 Resident – member LRT CAC) Bob Spaulding (District 17 Resident), Rod Halvorson (City Walk Resident), Chip Lindeke (RRTL Architects), Nick Kaster (Outside Counsel for St. Louis Church), Paul Morrissey (Priest at St. Louis Church), Tom Kigin (VP/General Counsel at MPR), Margaret Ann Hennen (Communications Director at MPR), Karl Karlson (District 17 Resident and member LRT-CAC for CRC), Craig Rafferty (RRTL Architects), Chamath Perera (District 17 Resident), Jim Schueppert (Member of St. Louis Church), Email Comments from David Colby (Pastor at Central Presbyterian Church), John Schachterle (CRC Director and member of City's Station Area Planning Committee)

#### CEDAR DIAGONAL

- Skyway access needs to be maintained between the University Club and Alliance Bank Center, with only the minimal necessary interruption for the reconfiguration of the skyway itself.
- The age of the University Club, and impact on the historic building is a concern
- The noise produced on the turn is a concern, though the 45° turn should produce less noise than the 90° turn.
- It will be important to maintain access to Ecolab's loading dock. .

#### MAINTENANCE FACILITY

- A maintenance facility at this particular site seems fraught with problems, conflicts with the overwhelming body of established planning direction for the area, in conflict with significant recent investment in the surrounding area, and will have serious consequences for the enjoyment of the surrounding neighborhood and natural systems.
- There is concern over the facility's impact on the St. Paul downtown riverfront, which has received careful attention and substantial investment over the last decades, and is part of a river-focused National Park.
- As the City's Mississippi River Corridor Plan states, Industrial uses that don't need to be tied to the river should be located away from the river.
- The maintenance facility contradicts the intent of several key plans for downtown:
  - The Downtown Development Strategy
  - The City Comprehensive Plan (Mississippi River Chapter and others)
  - The River Gardens Plan of 1995 (a joint City and Lowertown Redevelopment Corporation effort)
  - The Urban Village Vision of 2005 (Lowertown Redevelopment Corporation)
  - St. Paul on the Mississippi Development Framework
  - National Great River Park Plan
  - Trout Brook - Lower Phalen Greenway Plan
- Significant noise will be made at the 90° turn off of 4th Street to access the maintenance facility, which is likely especially true if the turn is at Broadway, where it will have to be the sharpest

- Significant noise will be made by the switching and turning taking place in the rail yard of the maintenance facility, which would be within a National Park, and adjacent to the Bruce Vento Nature Sanctuary
- The future possibility for creating green connections to the River through the site will be severely diminished.

#### **WACOUTA OR BROADWAY APPROACH TO MAINTENANCE FACILITY**

- We are deeply concerned about the possibility of a maintenance facility being located at this site. If a maintenance facility at that location is deemed necessary, here are our observations about the maintenance facility.
- The turn to the maintenance facility will require a 90° turn, which will generate a substantial and loud squeal every time a train passes through the area. That turn will be the sharpest at Broadway, where it seems most likely to produce the most detrimental sound.
- The sounds made by the turn at Broadway will also impact the greatest number of nearby residents.
- The Broadway option goes right by one end of the Farmer's Market, which seems to create unwise conflicts between tightly-packed crowds of people several days a week, and passing trains. Any mitigation to help avoid conflict between these groups, such as fencing, is likely to further detract from the market environment.
- The Broadway option also adds several more blocks of on-street LRT trackage, resulting in diminished access for other modes of transportation.
- The Wacouta option takes away several developable parcels of land adjacent to the depot.

#### **RICE/UNIVERSITY**

- Minimize the trench around the Capitol, and Robert Street - need more research into exactly where the trench is proposed

#### **GENERAL**

- For several items, particularly those related to noise and vibrations on Cedar Street, there needs to be ongoing maintenance, monitoring, and review of the proposed mitigations to ensure they are living up to their potential.
-

## Other Comments

### 10TH & CEDAR ALIGNMENT

- Parking on Cedar Street in front of St. Louis Church and Central Presbyterian Church would be eliminated under current plans for LRT. This represents a loss of 20-25 spaces (unverified). This parking is needed to provide access for special church services. Funerals in particular need easy access to the front of the church to gracefully carry the casket to the hearse. With the loss of these spaces, access to the church for the disabled is very significantly diminished as well.
- Access to the driveway between Central Presbyterian Church and the Church of St. Louis is lost, further diminishing access to the church for events, and for the disabled.
- A lane of automobile traffic will be lost on Cedar street, resulting in congestion, particularly around the World Trade Center Ramp and other ramps
- The continuous vibration of trains could have an impact on the physical well-being of the older structures in the area, including the Church of St. Louis, the Exchange Building, and Central Presbyterian Church. Central Presbyterian Church is on the National Register of Historic Places.
- The continuous vibration, noise, EMF, and RFI interference could have an effect on sensitive sound and technology equipment, both at Minnesota Public Radio, at the St. Paul Conservatory of Music, and at McNally Smith College of Music.
- There will be a change in track alignment to the East side of Cedar Street going South as the train leaves the station. Changes in alignment tend to bring wheel squeal which would impact many of the surrounding structures.
- Views up the Cedar Street axis to the Capitol will be diminished by the presence of the station and overhead cables, which will encroach on the Cass Gilbert Plan for the Capitol.
- There will be a significant impact on infrastructure under Cedar Street, in particular as it will impact District Energy

### CHARACTER WITHIN A HISTORIC DISTRICT

- The station at 10th & Cedar is surrounded by significant historic buildings and sites, and should be designed with careful sensitivity to its place.
- The station at Union Depot will be in the Lowertown District, which is recognized on the National Register of Historic Places, and as such, has its own design guidelines. While this designation brings with it some specific standards to ensure new structures would integrate well with the district, it does not require the structure be strictly historicist in nature. In fact, it may be appropriate if the architectural character of the station is more neutral in design so it doesn't detract from the more authentically historic buildings nearby, and functions better as part of the district.



## CENTRAL PRESBYTERIAN CHURCH

500 Cedar Street, St. Paul, MN 55101 • Phone 651-224-4728 • Fax 651-291-1469  
Website: [cpcstpaul.org](http://cpcstpaul.org) • David D. Colby Pastor • Email: [dcolby@cpcstpaul.org](mailto:dcolby@cpcstpaul.org)

August 22, 2008

Central Corridor Project Office  
Attn: Kathryn O'Brien  
540 Fairview Avenue North, Suite 200  
Saint Paul, MN 55104

### **Comments on the Supplemental Draft Environmental Impact Statement (SDEIS) about the Central Corridor Light Rail and its impact upon Central Presbyterian Church**

**Approved by the Session of Central Presbyterian Church on August 19, 2008**

Dear Kathryn,

There is a story in the Bible about Jesus coming out of the temple in the capitol city of Jerusalem with his disciples.

As he came out of the temple, one of his disciples said to him, 'Look, Teacher, what large stones and what large buildings!' Then Jesus asked him, 'Do you see these great buildings? Not one stone will be left here upon another; all will be thrown down.'  
(Mark 13:1-2, New Revised Standard Version of the Bible)

Jesus was most certainly not speaking of the impacts of modern transportation upon the temple but his teaching is still relevant today for our church at 500 Cedar St. which is listed on the National Historic Register and home to a congregation founded in 1852, The proposed light rail line can positively impact transportation in St. Paul and the metro region and many Central Presbyterian Church members look forward to its completion. The SDEIS is supposed to address impacts and mitigation, but many of the impacts of LRT on Central Presbyterian remain unresolved or incomplete. No Section 4 evaluation was completed for the Alternative Analysis Draft in 2006 and section 7-4 of the current draft lacks clarity or specificity on how Central will be "used" or affected by the light rail. **With so many unresolved issues, Central believes the SDEIS fails to adequately address issues that will adversely affect religious services, the church structure, cultural and social events and the core operations of the church.** We request the Met Council adopt the measures below to minimize the negative impact of light rail on Central Presbyterian Church:



- Reduce vibration damage by using high-resilience track fasteners.
- Monitor vibration impacts to Central's building during construction and operation.
- Provide easy access for hearses and wedding vehicles.
- Minimize wheel squeal from train operations.
- Modify bell signals to not interfere with Central activities.
- Finalize plans for addressing the loss of Central's only ADA entrance.
- Restrict train speed to 10 MPH in front of Central's building.
- Preserve traffic signal at Exchange and Cedar St.
- Maintaining or extending current sidewalk length/width.
- Work with Central to minimize financial hardship from relocating district utilities.

### **SELECTION AND PLACEMENT OF CEDAR STREET ROUTE**

For many months in 2007 and into 2008, we were told by Met Council staff that no decisions had been made on the location of the track alignment on Cedar Street. On April 1, 2008, we were told by Traffic Engineer Dan Soler that a decision had been made for months that the tracks would be on the eastern side of Cedar, just 28 feet from front doors of the church and directly abutting the sidewalk alongside our church. While we have appreciated clear communications from Met Council staff since April 1, 2008, we have deep concerns about the prior process, particularly the selection of Cedar Street as the locally preferred route. To our knowledge, Central Presbyterian Church, its staff, or Session were never consulted in any of the previous studies. The selection of Cedar Street for LRT and the preliminary design, without major alterations, threatens the existence of two neighboring historic churches: Central Presbyterian and the Church of St. Louis, King of France. These two churches are pictured on S-1 in the Executive Summary of the SDEIS.

### **VIBRATIONS**

Vibration impacts are included in section 4-7 of the SDEIS. As a listed national historic building, Central is particularly susceptible to the harmful impacts of vibrations during the construction and operation of light rail. Our building does not have a steel superstructure, it is simply stone on stone. This architectural and cultural treasure with some of the best acoustics in the Twin Cities, historical pipe organ, and stained glass windows is at risk.

Our concerns for harmful impacts of operational vibrations are shared by our neighbors Minnesota Public Radio and the Church of St. Louis, King of France. The quality of worship services, concerts, and recordings will be negatively impacted and compromised.

We appreciate that the Met Council took these concerns seriously and included us in a vibrations analysis conducted by ATS Consulting. Their results show that vibrations from the train operation would exceed the FTA impact threshold. ATS concludes that the impact can be brought within the allowed FTA criteria through the use of high-resilience track fasteners.

However, the analysis does not take into account the aging of rails, equipment, track fasteners, or the existence of gaps in the rails near stations which produce additional vibrations. And at this point we have no assurance that the FTA criteria will indeed protect these buildings.

**We request:**

**Adequately tested high-resilience track fasteners from 10<sup>th</sup> Street to 7<sup>th</sup> Street.**

**Ongoing monitoring of vibration effects upon our structure during construction and operation.** Interference from vibrations might be immediate and noticeable, but damage to the foundation may be gradual and not detected for years.

**ACCESS TO SANCTUARY FOR FUNERALS AND WEDDINGS.**

Current plans for the LRT alignment on the eastern side of Cedar will remove all current parking along Cedar. This has a particular impact on our ability to conduct funerals, as caskets are only able to enter and depart the sanctuary from the main doors on Cedar. Met Council staff, including Traffic Engineer Dan Soler, have listened to our concerns, and have made verbal commitments to modify current engineering plans so as to allow for zoned parking for hearses and wedding vehicles. The RLUIPA Act – Religious Land Use and Institutionalized Persons Act passed by Congress in 2000 bars government from enforcing zoning codes that impose a substantial burden on religious assembly. In order to continue to function as an active church, Central Presbyterian Church must be able to conduct funerals and weddings.

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

**NOISE**

The SDEIS notes that noise levels are measured against ambient measures of the current soundscape. We believe this to be a flawed measure of the impact of the light rail operation's impact on worship services and other religious activities of Central. We have received conflicting information from Met Council staff to the question of whether warning bells will sound on all trains in front of our church at all times.

Persistent and predictable ringing of warning bells with every train, one each way every 7-10 minutes in front of our sanctuary, will disrupt worship, concerts, recording sessions, speakers and other cultural events in a way different than the current soundscape which is much more random in nature. In addition, our historic sanctuary is not air-conditioned further preventing our religious activities from being isolated from outdoor noise.

In addition, the ATS consulting report on vibrations and noise impact could not answer the question of whether and to what extent we will experience what is called "wheel squeal" as the train travels on a track alignment that changes from the middle of Cedar to the eastern side of Cedar in the area immediately in front of our sanctuary.

**We request a noise mitigation plan including these elements:**

- 1. Reduce wheel squeal by using as gradual an angle as possible as the LRT line transitions from the middle of Cedar Street to the eastern side.**
- 2. Change or clarify the Standard Operating Procedures for warning bells in the area of track within hearing of our sanctuary,**
- 3. Include measures to isolate our sanctuary from this regular and disruptive noise.**

### **ALLEYWAY ACCESS**

With current engineering plans for LRT to go on the eastern side of Cedar, Met Council staff have informed us that we will not have continued access to our alleyway (located off Cedar Street on the north side of the church property). Page 238 of the SDEIS states that "Potential of access closure; on street parking removed; closure of access could be an adverse effect."

Closure of this access does have an adverse affect, since it is our only ADA-approved handicap accessible entrance. Loss of this entrance is unacceptable and presents other legal implications. LRT staff, including a traffic engineer and architect, have met on site to explore how the Central Corridor Project could meet the ADA requirements resulting from the loss of this entrance.

**Met Council must resolve the loss of this accessible entrance and have the resolution measures accepted by Central Presbyterian Church. The costs must be included in the overall project.**

### **PEDESTRIAN SAFETY**

Central Presbyterian Church and the Church of Saint Louis, King of France have deep concerns for the safety of pedestrians, some of whom have mobility issues, crossing Cedar Street to enter either church. We have had conversations with Met Council staff on addressing these safety concerns, but want to reiterate them.

**We request that Central Corridor address these safety concerns by:**

- 1. Preserving a traffic-signal for pedestrians at the intersection of Cedar and Exchange,**
- 2. Maintaining or extending the current sidewalk width,**
- 3. Restricting train speed to less than 10 mph in front of our building.**

### **RELOCATION of UTILITIES**

We are customers of District Energy for heating and cooling, and all our utilities enter the church building from Cedar Street. The selection of Cedar Street for LRT will require the costly relocation of pipes and other structures that are below Cedar Street. According to District Energy, the SDEIS is incorrect in stating the impacts of the proposed LRT line on utilities costs. These costs, if passed on to consumers, could prove too expensive a hurdle for Central Presbyterian Church to absorb.

**We request that the relocation of utilities be taken seriously, understanding that the costs involved are direct ramifications of the selection of Cedar Street**

**SUMMARY:**

On page S-20 of the SDEIS there is a picture of St. Louis Church and part of Central Presbyterian with the caption: "Churches in downtown St. Paul are a significant part of the visual character of Cedar Street and are important historic landmarks." We understand the complexity of project but want to make it clear that the current proposal threatens Central's existence as a church. We feel the requests above fairly represent our concerns and provide the Met Council with specific actions that can both ensure the ministry of Central and success of the Light Rail project. We look forward to future discussions to resolve these matters.

On behalf of the Session,



The Rev. Dr. David D. Colby

cc: Rev. Dr. Robert Cuthill, Executive Presbyter of the Twin Cities Area  
The Honorable Betty McCollum, United States Representative  
The Honorable James Oberstar, United States Representative  
The Honorable Chris Coleman, Mayor of the City of St. Paul  
St. Paul City Council member Dave Thune  
Ramsey County Commissioner Rafael Ortega  
William H. Kling of Minnesota Public Radio  
Jeff Nelson of Minnesota Public Radio  
Father Paul Morrissey of the Church of St. Louis, King of France  
Dennis Gimmetad, Minnesota Historical Society  
Paul Larson, St. Paul Historic Preservation Commission  
Susan Foote, St. Paul Historic Preservation Commission  
Jackie Sluss, Cultural Resources Unit of the MN Dept. of Transportation  
Peter Bell, Met Council Chair

**MEIER, KENNEDY & QUINN**CHARTERED  
ATTORNEYS AT LAWLEO H. DEHLER  
THOMAS B. WIESER  
CHARLES M. BICHLER  
JOHN C. GUNDERSON  
PATRICK M. ANDERSON  
NICHOLAS J. KASTERSUITE 2200, BREMER TOWER  
445 MINNESOTA STREET  
SAINT PAUL, MINNESOTA 55101-2100  
TELEPHONE (651) 228-1911  
FACSIMILE (651) 223-5483WILLIAM C. MEIER  
(1920-1981)  
TIMOTHY P. QUINN  
(1921-1991)  
ALOIS D. KENNEDY, JR.  
(RETIRED)

nkaster@mkqlaw.com

August 25, 2008

**VIA ELECTRONIC MAIL AND UNITED STATES MAIL**Ms. Kathryn O'Brien  
Central Corridor LRT Project Office  
540 Fairview Avenue N., Suite 200  
St. Paul, MN 55104Mr. David Werner  
Federal Transit Administration  
Region V  
200 West Adams Street, Suite 320  
Chicago, IL 60606**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor  
Supplemental Draft Impact Statement***  
**Our File No.: 10909**

Dear Ms. O'Brien and Mr. Werner:

The Church of Saint Louis, King of France (the "Church" or "St. Louis") submits the following comments on the Central Corridor Supplemental Draft Impact Statement (the "SDEIS").

**Summary of Comments**

- I. The Church of Saint Louis, King of France – Historical and Cultural Significance
- II. Section 4(f) Use of the Church
  - a. Repeated Interruption by Signal Device Noise is a Use under Section 4(f)
  - b. Vibration Impact on Plasterwork and Pipe Organ are Uses under Section 4(f)
    - i. Vibration Impact on Plasterwork
    - ii. Vibration Damage to Laura L'Allier and Raymond Houle Memorial Organ
- III. Noise Analysis Omits Probable Noise Sources and Relies on FTA Standards that are Clearly Disparate from the Actual Conditions Near the Church
- III. Interruptions of Religious Services, Limitations on Ability to Practice Funeral Rites, and the Adverse Effects on the Pipe Organ all Caused by the Project Violate the Religious Land Use and Institutionalized Persons Act

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 2*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

## **I. The Church of Saint Louis, King of France – Historical and Cultural Significance**

The Catholic parish of The Church of Saint Louis, King of France has had a presence in downtown Saint Paul for nearly 140 years, and is preparing to celebrate its 100<sup>th</sup> anniversary in its current location. Presently, the parish is comprised of 700 families and 2,200 associates of the Church. The Church also provides a quiet sanctuary to numerous other visitors on a daily basis.

The structure housing the Church and its adjacent rectory are eligible for listing on the National Register of Historic Places under Criterion C as the work of a master architect – Emmanuel Masqueray. See Hennepin County Regional Railroad Authority, Ramsey County Regional Railroad Authority, and Minnesota Department of Transportation, *Phase I and II Cultural Resources Investigations of the Central Corridor Minneapolis, Hennepin County and St. Paul, Ramsey County, Minnesota* (1995) (the “Cultural Investigation”). Emanuel Masqueray was known as a premier architect of Midwest Catholic churches, designing the Cathedral of Saint Paul and the Basilica of Saint Mary. See A.K. Lathrop, *A French Architect in Minnesota: Emmanuel Masqueray 1861-1917*, Minnesota History Summer 1980, at 52. Masqueray’s architecture with respect to the Church has been described as a

complex interplay of eclectic styles and forms. Its Latin cross plan is Romanesque, but the structure is decorated with Baroque bell tower, Romanesque windows, and a classical entrance entablature. The exterior is articulated with two tiers of arched windows, denticulated cornices, columns and basket weave patterned brick detailing . . . Rather than appearing busy or uneasily encrusted with disparate decoration, the St. Louis Church is crisp and linear, almost sentinel-like.

See Cultural Investigation, at 9-60. Moreover, notwithstanding the fact that St. Louis was the first of Masqueray’s commissioned parish churches, it is “one of Masqueray’s finest efforts in small church architecture.” See Lathrop at 53.

Additionally, the Church’s interior highlights French, French-Canadian, and early St. Paul French Canadian history and lore.

The stained glass windows, with the exception of the rose transept windows, all depict ‘God’s deeds by the French.’ The five sanctuary windows portray the life of St. Louis, King of France . . . The windows in the nave intermingle events in France, Canada, and the United States. One shows the first Mass of Canada, another depicts Father Hennepin planting the cross on the banks of the Mississippi. Small sepia windows at the top and bottom of the nave windows show . . . the St. Paul Cathedral, and the present St. Louis Church itself.

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 3*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

See Cultural Investigation, at 9-58.

In addition to providing parishioners, neighbors and guests a beautiful, serene environment for quiet reflection, St. Louis's 1998 Casavant Organ, the Laura L'Allier and Raymond Houle Memorial Organ, draws guest organists from around the country to perform recitals and Tuesday "Lunch-time" Recitals. In fact, the Laura L'Allier and Raymond Houle memorial organ is regularly featured on American Public Media's program "Pipedreams," a national radio program celebrating pipe organ music.

## **II. Section 4(f) Use of the Church**

As a federally funded transportation program, the Central Corridor Light Rail Transit Project (the "Project") must comply federal environmental protection and historic preservation laws, including Section 4(f) of the Department of Transportation Act of 1966, 49 U.S.C. § 303(c) ("Section 4(f)"). See *Valley Community Preservation Comm'n v. Mineta*, 373 F.3d 1078, 1084 (10<sup>th</sup> Cir. 2004). Section 4(f) applies to all transportation projects that *may* adversely affect historic site of local, state, or national significance. A property is "historic" for Section 4(f) purposes if that property, like the Church and adjacent rectory, are eligible for listing on the National Registry of Historic Places. See 23 C.F.R. § 771.135(e); Cultural Investigation, at 9-58.

### **a. Repeated Interruption by Signal Device Noise is a Use under Section 4(f)**

Under Section 4(f), the Secretary of Transportation shall not approve a transportation program or project requiring the use of land of a historical site of national unless

- (1) there is no prudent and feasible alternative to using that land; and
- (2) the program or project includes all possible planning to minimize harm to the historic site resulting from the use.

49 U.S.C. § 303(c). If historic property is used, the agency may not go forward with the project unless it complies with Section 4(f). See 49 U.S.C. § 303(c); 23 C.F.R. § 771.135(a).

A "use" of protected property can be direct or constructive. Constructive use occurs when the project does not incorporate the land, but "the project's proximity impacts are so severe that the protected activities, features or attributes that qualify as a resource for protection under section 4(f) are substantially impaired." See 23 C.F.R. § 771.135 (p)(2). A constructive use occurs when:

- The projected noise level increase attributable to the project substantially interferes with the

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 4*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

use and enjoyment of a noise-sensitive facility of a resource protected by section 4(f), such as enjoyment of a historic site where a quiet setting is a generally recognized feature or attribute of the site's significance;

- The proximity of the proposed project substantially impairs esthetic features or attributes of a resource protected by section 4(f), where such features or attributes are considered important contributing elements to the value of the resource;
- The vibration impact from operation of the project substantially impairs the use of a section 4(f) resource, such as projected vibration levels from a rail transit project that are great enough to substantially diminish the utility of the building.

*See 23 C.F.R. § 771.135(p)(4)(i-v).*

Observation of the Hiawatha Line reveals that brake squeal and signal devices are a significant source of noise. Indeed, the signal devices are estimated to have weighted sound levels of 90 dBA (horn) and 100 dBA (bell). These observations also revealed that noise from brake squeal and signal devices occurred with a greater frequency at stations and intersections controlled by traffic signals.<sup>1</sup> In light of the Church's proximity to the Tenth Street Station and the signalized intersection at Tenth and Cedar the Church will be frequently subjected to intense noise from brake squeal and train signals.

Based on estimates provided in the SDEIS, a train will pass in front of the Church every 7.5 minutes during peak operating hours and every 10 minutes during off-peak hours. *See* SDEIS at S-14. Considering only regularly scheduled Church events, horn blasts and train bells will interrupt these events and services at least 282 times a week.<sup>2</sup> The intensity and frequency of the noises generated by the Project will significantly and adversely affect the quiet and serene environment of the Church, supporting a determination that it is used under Section 4(f). Because the Church is subject to Section 4(f) use an examination of alternatives and mitigation is required before the Secretary of Transportation can approve the Project.

---

<sup>1</sup> The noise generated by train signals has been considered "extremely annoying to nearby residents." *See* Department of Transportation, Federal Transit Administration, *Transit Noise and Impact* (May 2006) at 2-7.

<sup>2</sup> This figure is based on the number of times a train will enter the Tenth Street Station and sound its bell/horn prior to entering or departing the station. This figure does not attempt to estimate the frequency of brake squeal generated entering the station or in observation of the traffic signal on Tenth and Cedar. This figure also excludes consideration of signal device use prior to entering the Tenth and Cedar intersection after stopping for a red light. Accordingly, the Church will likely be subjected to substantially greater interruptions than predicted here.

---



*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 5*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

**b. Vibration Impact on Plasterwork and Pipe Organ are Uses under Section 4(f)**

The current home to the Church is nearly 100 years old and “it appears now almost precisely as it did in 1915.” See Cultural Assessment at p. 9-57. A significant part of the interior beauty of the Church is the plasterwork. Tantamount to the beauty of the plasterwork, is the magnificence of the Laura L’Allier and Raymond Houle Memorial Organ.

**i. Vibration Impact on Plasterwork**

The interior plaster walls and plaster ceiling and were constructed using the building techniques of the early twentieth century. Pursuant to such methods, wooden lathe was attached to the structural members within the walls and ceilings with each course of lathe spaced  $\frac{1}{4}$  of an inch from its neighbor. Plaster mixed with horse hair was applied to the walls and ceilings in a manner to force the plaster into the spaces between neighboring courses of lathe. Application of the plaster in this manner caused the plaster curl around the back of the lathe, forming “plaster keys.” The plaster keys are critical to the adherence of the plaster to the lathe.

Due to the age of the plaster keys, they are particularly vulnerable to damage from vibrations. Based on conversations with structural engineers, the cumulative effect of relatively weak vibration events (less than 90 VdB) may be sufficient to critically damage the plaster keys resulting in significant damage to the Church and potential injury to parishioners and guests.<sup>3</sup>

**ii. Vibration Damage to Laura L’Allier and Raymond Houle Memorial Organ**

The Laura L’Allier and Raymond Houle Memorial Organ is a 1998 Casavant Freres instrument that relies on 3,300 pipes to create its beautiful sound. The majority of organ pipes and supporting components are housed in an elevated choir loft that is located on the far western end of the Church – the wall closest to the train. Of the 3,300 pipes used by the organ, 3,000 are flue pipes that create sounds similar to that of a flute or recorder. The others are primarily reed pipes that generate sounds similar to a clarinet or bassoon.<sup>4</sup> Both are extremely vulnerable to vibrations.

According to Denis Blain, Casavant’s technical director, pipe organs are particularly susceptible to vibrations and certain pipes can be rendered inoperable if particulate matter (*e.g.*, dust, hair) enters certain pipes. Mr. Blain stated that the tuning mechanism for flue pipes is one element that

---

<sup>3</sup> In an attempt to determine and document the state of the plaster keys, the Church is currently surveying the status of the plaster keys in the ceiling of the church.<sup>3</sup> Preliminary investigation reveals a state consistent with their age.

<sup>4</sup> In addition to difference in sound created by the reed pipes and flue pipes, the mechanism through which sound is generated also differs. Reed pipes generate sound by vibrating a brass strip (the “reed”); whereas, flue pipes, which contain no moving parts, generate sound solely through the vibration of air molecules.

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 6*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

can be adversely affected by vibrations. To tune a flue pipe, a “slide” mechanism to alter the length of the pipe, thereby changing its sound. The slide is held in position by friction between the slide and the pipe. According to Mr. Blain, in some cases, relative weak vibrations can overcome the friction forces holding the slide in place, causing the slide to slip, and resulting in the organ being out-of-tune.<sup>5</sup> Frequent vibrations can render the organ’s flue pipes perpetually out-of-tune.

Mr. Blain also expressed concern regarding the reed pipes. Different from flue pipes, reed pipes can be rendered entirely inoperable if particulate matter falls into the pipe. A strand of hair is enough to prevent these pipes from operating. Vibrations even if beneath damage threshold will likely create increased levels of dust in the Church, thereby, increasing the risk that significant elements of the Church’s organ will be rendered inoperable. In light of the organ’s particularly susceptibilities to vibration, damage to the organ will likely occur at a significantly lower threshold. In fact, had Mr. Blain known that the Church was to be subject to recurring vibrations, he would have recommended a comb style tuning mechanism for the pipes that is not susceptible to vibration.<sup>6</sup>

Akin to noise generated from the Project, vibrations will also have significant affects on the Church. The effects of the vibration on the plaster keys will significantly affect the beauty of the Church and could threaten the safety of parishioners and guests. Additionally, Project-generated vibrations may render the Church’s pipe organ inoperable, or to prevent such an eventuality, will require the Church to incur significant cost to retrofit the organ in order to safeguard it from vibrations. The vibrations generated by the Project certainly affect the beauty and utility of Church and its pipe organ. These effects support a determination that it is used under Section 4(f), and require a full examination of alternatives and mitigation measures before the Secretary of Transportation can approve the Project.

### **III. Noise Analysis Omits Probable Noise Sources and Relies on FTA Standards that are Clearly Disparate from the Actual Conditions Near the Church**

As a condition precedent to the approval of a transportation project, Section 4(f) requires a *complete* investigation of the potential harms and potential mitigation measures to ensure the preservation of a historic site. Here, Project staff and consultants have omitted known Project-generated noises in the consideration of potential impact to the Church, and have relied on FTA standards that are obviously different from actual Project conditions.<sup>7</sup> Consequently, the conclusion

---

<sup>5</sup> At this time, no information about the intensity or frequency of vibration needed to cause the slide to slip is available. The Church is currently seeking such information, and expects that similar efforts will be undertaken by Project staff or consultants. The Church further expects that in the event no information is discovered, additional vibration analysis will be completed to ensure the organ will not be adversely affected by Project operations.

<sup>6</sup> A comb type tuning system could be retrofitted on the organ for approximately \$100,000.00.

<sup>7</sup> The SDEIS relies on a FTA standard that assumes the distance from the source to the receiver is fifty feet; whereas,

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 7*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

that the Church is unlikely to be used by the Project, is not only suspect, but fails to satisfy the complete investigation and mitigation requirements of Section 4(f).

The methodology employed by Project staff and consultants to determine the impact of Project operations on the Church assumes the use of three-car trains and continuously welded track. Noticeably absent from these assumptions are the intense, frequent noises generated by brake squeal, wheel impact, and train signal devices. Due to the Church's proximity to the Tenth Street Station and the signalized intersection at Tenth and Cedar it will undoubtedly be frequently subjected to the intense noise from brake squeal and train signals. The frequency and intensity of these noises will undoubtedly affect the sound energy reference levels stated in the SDEIS.<sup>8</sup>

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

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

### **III. Interruptions of Religious Services, Limitations on Ability to Practice Funeral Rites, and the Adverse Effects on the Pipe Organ all Caused by the Project Violate the Religious Land Use and Institutionalized Persons Act**

In addition to the protections afforded the Church under federal preservation and historic laws, the Religious Land Use and Institutionalized Persons Act, 42 U.S.C. § 2000cc *et seq.* ("RLUIPA") further protects the Church from infringements on religious exercise. Specifically, RLUIPA prohibits the government from imposing or implementing a land use regulation in a manner that

imposes a substantial burden on the religious exercise of a person, including a religious assembly or institution, unless the government demonstrates that imposition of the burden on that person, assembly, or institution

---

predict Project conditions place the Church within 35 feet of the noise source. See SDEIS at 4-49.

<sup>8</sup> Sound naturally attenuates due to distance. With respect to point sources, such as the bell and horn, attenuation with distance is considerable – 6 decibels per doubling of distance. See Impact Assessment at 2.3.

---

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 8*

**Re: *Comments of The Church of Saint Louis, King of France on the Central Corridor Supplemental Draft Impact Statement***  
***Our File No.: 10909***

(A) is in furtherance of a *compelling* governmental interest; and

(B) is the least restrictive means of furthering that compelling governmental interest.

See 42 U.S.C. § 2000cc(a)(1) (emphasis added).

Religious exercise is broadly defined “to the maximum extent permitted by the terms of this chapter and the Constitution” *see* 42 U.S.C. § 2000cc-3(g), and includes “any exercise of religion, whether or not compelled by, or central to, a system of religious belief,” *See* 42 U.S.C. § 2000cc-5(7)(A). Use of real property for religious exercise purposes is considered to be religious exercise under the statute. *See* 42 U.S.C. § 2000cc-5(7)(B).

As has been clearly established by the comments herein and the voluminous comments previously submitted by parishioners and friends of the Church, the Project will impermissibly infringe on the religious practices conducted in and around the Church. Put simply, the Project jeopardizes characteristics of the Church that are fundamental to the practice of the Catholic faith. As a result of Project operations:

- the Church’s ability to conduct dignified, solemn and respectful funeral processions in honor of friends and family members will be significantly diminished;
- the quiet environment inside the Church essential for prayer and contemplation will be obliterated by repeated, loud horn blasts, brake squeals, and train bells;
- Catholic rituals and rites will be repeatedly disrupted by train signal devices and other transit noises; and
- the beautiful music included in religious rites and rituals will be marred by horns, bells, and squeals generated by the Project.

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

The effects of noise and vibration generated by the project will have significant effects on the Church affecting every aspect of its religious practices. Noise and vibrations generated by the project threaten the quality of music, the ability to carry out solemn rites in a quiet environment, and the ability to worship in a historically significant and beautiful building. Accordingly, federal preservation

---

*Ms. Kathryn O'Brien*  
*Mr. David Werner*  
*August 25, 2008*  
*Page 9*

***Re: Comments of The Church of Saint Louis, King of France on the Central Corridor  
Supplemental Draft Impact Statement  
Our File No.: 10909***

and historic laws and RLUIPA mandate a more exhaustive examination of the adverse effects operation of the Project will have on the Church and consideration of how these effects may be avoided or mitigated.

Preservation of the Church and its beautiful, serene environment are critically important to parishioners, Church associates, and visitors. To that end, the Church looks forward to working with Project staff and consultants to ensure that the unique characteristics of the Church are safeguarded.

Sincerely,

MEIER, KENNEDY & QUINN, CHARTERED

*Nicholas J. Kaster*

Nicholas J. Kaster

NJK:vml

cc: Reverend Paul Morrissey, Pastor, The Church of St. Louis, King of France  
Andrew Eisenzimmer, Chancellor of Civil Affairs, Archdiocese of St. Paul and Minneapolis  
David Colby, Pastor, Central Presbyterian Church  
Jeffrey Nelson, Public Affairs Director, American Public Media | Minnesota Public Radio  
  
James Oberstar, Representative United States Congress, District 8, Minnesota

C13\10909.SDEIS response



# DISTRICT COUNCILS COLLABORATIVE of Saint Paul & Minneapolis

1080 University Avenue West • Saint Paul, MN 55104  
651-249-6877 • www.dcc-stpaul-mpls.org

District 6  
North End-South  
Como

August 25, 2008

District 7  
Thomas-Dale

Kathryn O'Brien, Project Manager  
Central Corridor Project Office  
540 Fairview Avenue North, Suite 200S  
St. Paul, MN 55104

District 8  
Summit-University

Dear Ms. O'Brien:

District 10  
Como

The District Councils Collaborative of Saint Paul and Minneapolis (DCC) writes to provide comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor Light Rail Transit (CCLRT) Project, located in Minneapolis and Saint Paul, Minnesota.

District 11  
Hamline-Midway

District 12  
Saint Anthony Park

The DCC is a nonprofit organization, whose 15 members are city-recognized neighborhood planning organizations (ten in Saint Paul and five in Minneapolis) serving approximately 180,000 people living on or near the proposed CCLRT Project alignment. The DCC is supportive of constructing LRT in the Central Corridor alignment and envisions the CCLRT as a "community connector" within a dual-hub, regional transit system. Its mission is to facilitate community involvement in the CCLRT planning process and to ensure that the needs and interests of the constituents of its member organizations are represented.

District 13  
Union Park

District 14  
Macalester-  
Groveland

District 16  
Summit Hill

District 17  
CapitolRiver Council

The DCC has read the SDEIS and discussed its findings, conclusions, and mitigation recommendations. The DCC Governing Council has approved these comments; it should be noted that many individual member organizations are submitting comments as well. The DCC is organizing its comments around the nine key project elements addressed in the SDEIS with other considerations addressed in the final section. The DCC submitted comments regarding the Draft Environmental Impact Statement (DEIS) and the SDEIS Work Scope. The SDEIS does address some of these comments, but responses to other comments were deferred to the Final Environmental Impact Statement. (see Attachment A)

Marcy-Holmes  
Association

Prospect Park-East  
River Road Im-  
provement Associa-  
tion

Southeast Como  
Improvement Associa-  
tion

University District  
Improvement Associa-  
tion

West Bank Commu-  
nity Coalition

Because of the complexity and significance of transportation impacts resulting from the closure of Washington Avenue for a transit/pedestrian mall, the DCC has retained the transportation-consulting firm Howard R. Green to assist with preparation of SDEIS comments. Their comments have been incorporated into our document, and we request that they be included in their entirety.

**Key Element 1. Hiawatha/Central Corridor Connection**

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

There are several neighborhoods along the Central Corridor that were negatively impacted by major Federal Interstate Highway construction projects. While it may not be the responsibility of the Central Corridor LRT project to mitigate for past negative impacts, it should not knowingly exacerbate past negative impacts if other alignment options are viable.

*The SDEIS should include in the Social and Economic Effects Sections the 15<sup>th</sup> Avenue/Washington Parkway land use and redevelopment opportunity as identified by the West Bank Community Development Corporation. Furthermore, Central Corridor Project Office (CCPO) and appropriate Project Partners should work with the West Bank CDC and Cedar-Riverside Community to identify and test alignment adjustments that would retain the maximum amount of developable land and not preclude reconnecting 15<sup>th</sup> Avenue across Washington Parkway. This investigation and the results should be included in the Final Environmental Impact Statement (FEIS).*

**Key Element 2. Washington Avenue Transit/Pedestrian Mall on the East Bank of the University of Minnesota.**

The SDEIS discloses analyses of the impacts of creating a transit/pedestrian mall between Oak Street SE and Pleasant Avenue SE of the East Bank of the University of Minnesota. At the University of Minnesota's insistence, the Washington Avenue transit/pedestrian mall will be closed to through traffic. Emergency vehicles and buses, however, will be permitted access.

Closing this segment of Washington Avenue will have significant impacts on adjacent neighborhoods. Streets that are connected to river crossings and freeway ramps (e.g. Franklin Avenue, Riverside Avenue, University Avenue and Fourth Street) will see significant increases in traffic volumes and more intersections will operate at LOS F or lower. The SDEIS proposes mitigation for the most severely impacted intersections, but proposes no mitigation to address neighborhood concerns about the diminished livability of neighborhood streets for residents and businesses, pedestrians, and bicyclists.

In response to this omission, the DCC retained Howard R. Green Company to assist in the preparation of SDEIS comments that clearly articulate neighborhood transportation issues to be addressed in the FEIS. The product of this consultation is put forth in the following letter from Howard R. Green.



August 25, 2008

Carol Swenson, Community Liaison  
District Councils Collaborative of Saint Paul and Minneapolis  
1080 University Avenue W.  
Saint Paul, Minnesota 55104

Re: Central Corridor Light Rail Transit Supplemental DEIS

Dear Ms. Swenson,

Howard R. Green (HR Green) has the following comments on the Central Corridor Light Rail Transit Supplemental DEIS (SDEIS) on behalf of the District Councils Collaborative of Saint Paul and Minneapolis (DCC).

## **1.0 GENERAL COMMENTS**

This section of our comment letter identifies general issues that apply to the proposed project in general.

### **1.1. Cumulative Effects**

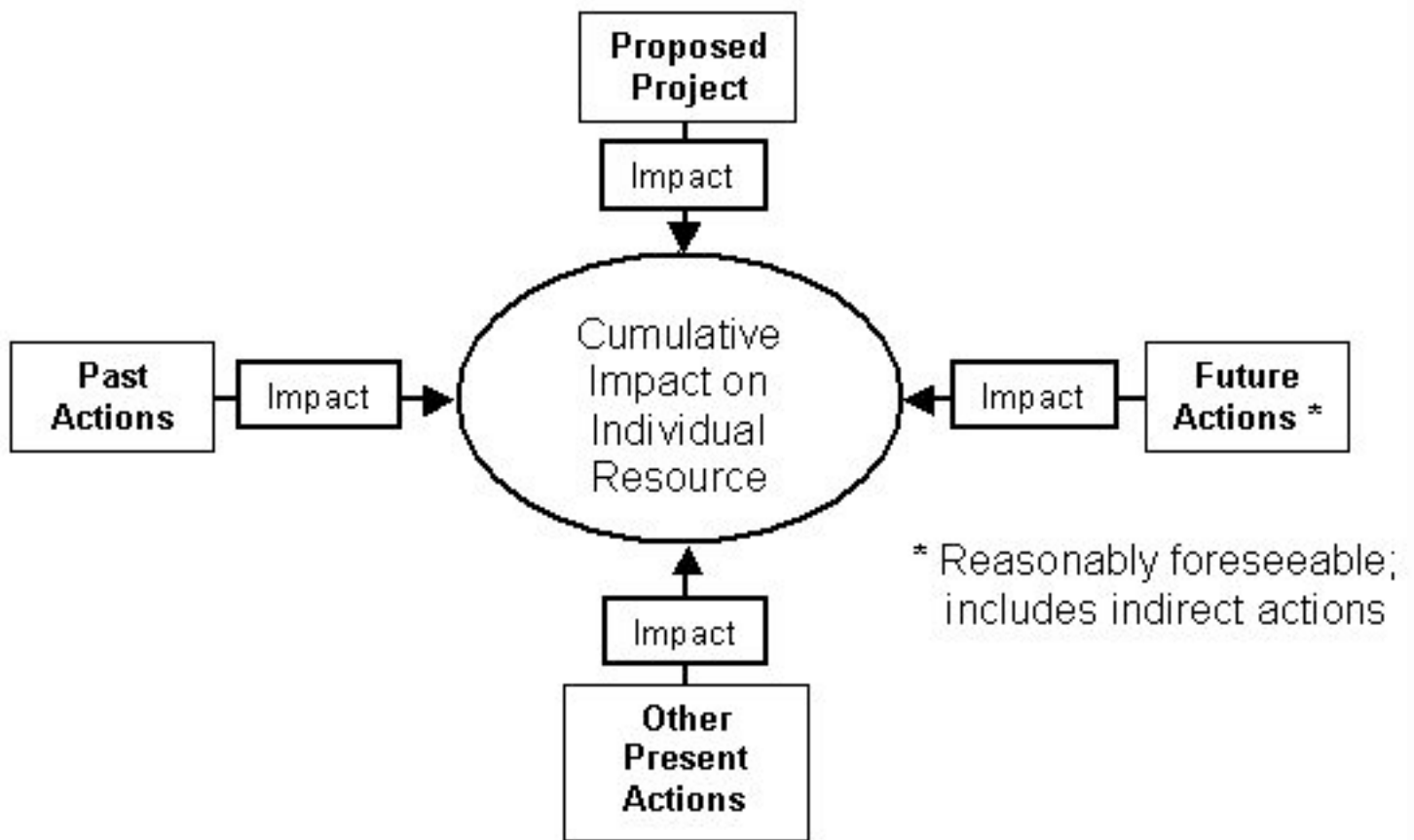
Cumulative effects regarding traffic, parking, bicycle and pedestrian access and safety, neighborhood appearance and character, and short length bus service are not addressed in sufficient detail to allow decision-makers to determine if there are significant impacts related to the development of the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

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

A cumulative effect or impact is the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person is undertaking such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR § 1508.7).

A cumulative impact includes the total effect on a natural resource, ecosystem, or human community due to past, present, and future activities or actions of Federal, non-Federal, public, and private entities. Cumulative impacts include the total of all impacts to a particular resource that have occurred, are occurring, and will likely occur as a result of any action or influence, including the direct and reasonably foreseeable indirect impacts of a Federal activity. Accordingly, there may be different cumulative impacts on different environmental resources.





Source: FHWA

At the state level, per the Minnesota Supreme Court 'CARD' decision (Citizens Advocating Responsible Development vs. Kandiyohi County), Minn. R. 4410.1700, subp. 7, item B, the environmental review process is required to identify any past, present or reasonably foreseeable future projects that may interact with the project in such a way as to cause cumulative potential effects.

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

## 1.2. Cost Effectiveness Index

The LRT project is generally consistent with the goals of the DCC. However, it is critical that impacts are appropriately evaluated and suitable mitigation measures are developed to ensure that project development does not significantly impact the human community living in, traveling through, and working in the area. At local meetings the cost effectiveness index has been cited as a reason for not addressing some project impacts or the consideration of some potential mitigation measures.

The cost effectiveness index implemented by FTA should not limit the types or level of detail of impact assessment or what mitigation measures can be considered. The environmental review process should be conducted without regard for the effect it has on the index. The determination of who will pay for identified mitigation measures should be made in a different arena and not overflow into the environmental review process.

## 1.3. Potential Mitigation Measures

In addition, suitable mitigation measures were not identified.

The traffic studies do not identify mitigation to intersections that currently experience congestion problems and the SDEIS states, "The Metropolitan Council is evaluating a number of potential strategies to improve operations at intersections operating at a deficient LOS". Improvements to these intersections need to be identified and incorporated into the traffic analysis.

### 1.3.1. Traffic

The traffic studies performed for the Central Corridor SDEIS have not addressed several neighborhood concerns. The traffic generated and evaluated is underestimated since the cumulative effects of other projects were not specifically included in traffic projections. In addition, the analysis performed was limited to the vehicular operations and did not address the pedestrian and bicyclist safety and operations along the corridor and vicinity.

The environmental review needs to identify which actions are included as part of the cumulative effect evaluations, average and peak traffic levels on all area streets and highways with all past, present, and reasonable foreseeable future actions included, and identify suitable mitigation measures to ensure that traffic impacts will not result in negative impacts to area neighborhoods, area businesses, University students and staff, others driving through the area, as well as pedestrians and bicyclists. The Washington Avenue traffic studies also need to address the impacts from the increased miles driven along the diverted routes.

- The traffic generated by each of the projects is not specifically identified and included in the traffic analysis. Each of these projects contributes to the overall traffic impacts and should be evaluated as part of the cumulative effect evaluation. Even if the traffic for an individual project is limited in duration, is periodic, occurs in an area that already has a failing level of service, and as a result was not included in the traffic model for the project it must be included in order to address cumulative traffic impacts.



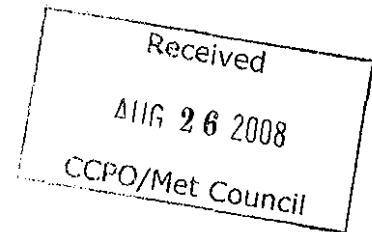
U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Great Lakes Region  
Minneapolis Airports District Office  
6020 28<sup>th</sup> Ave S, Room 102  
Minneapolis, MN 55450

August 21, 2008

Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave North, Suite 200  
St Paul, MN 55104



Re: Central Corridor Light Rail Transit Project Supplemental Draft EIS

Dear Ms. O'Brien:

The Minneapolis Airports District Office has no objections to the proposed Central Corridor Light Rail Transit project provided:

1. The Federal Aviation Administration (FAA) is notified of construction or alterations as required by Federal Aviation Regulations, Part 77, Objects Affecting Navigable Airspace, Paragraph 77.13. Please note that Part 77 includes temporary construction vehicles and equipment. The Notice of Proposed Construction or Alteration Form 7460-1 may be obtained and filed online at <https://oiaa.faa.gov> or mailed to:  
Express Processing Center  
FAA Southwest Regional Office  
Obstruction Evaluation Service, ARJ-32  
2601 Meacham Boulevard  
Fort Worth, TX 76137-0520
2. The FAA technical operations are contacted to identify any possible impacts to aircraft navigation and/or communication equipment. The MSP Technical Support Center Manager can be reached at (952) 997-9261 or in writing at:  
FAA – Minneapolis Technical Support Center  
Attn: MSP TSCM  
14800 Galaxie Ave, Suite 300  
Apple Valley, MN 55124

If not already included in your distribution list, please consider giving St Paul Downtown Airport an opportunity to provide input and comments.

I appreciate the opportunity to comment on the draft EIS for the proposed Central Corridor Light Rail Transit Project. Please contact me if you have any questions or need further information.

Sincerely,



Kandice Krull  
Environmental Protection Specialist  
FAA - Minneapolis Airport District Office  
612-713-4362  
Kandice.Krull@faa.gov



380 Jackson Street  
Gallier Plaza, Suite 500  
St. Paul, MN 55101-4802

651.291.6100  
651.291.6000 fax

[www.fhwa.dot.gov/mndiv](http://www.fhwa.dot.gov/mndiv)

August 25, 2008



Ms. Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave North, Suite 200  
St. Paul, MN 55104

**Re: Comments on Central Corridor  
Light Rail Transit SDEIS**

Dear Ms. O'Brien:

The Federal Highway Administration (FHWA) Minnesota Division Office, as a cooperating agency for the Central Corridor Light Rail Transit (LRT) Supplemental Draft Environmental Impact Statement (SDEIS), offers the following comments on the document:

1. The SDEIS is unclear as to possible effects to the Interstate system (I-35W, I-35E and I-94) due to the LRT construction and operation. We request a meeting with FHWA staff to better understand the potential effects to Interstate operations and right of way from the project.
2. The FHWA is the lead federal agency for the development of the Union Depot multi-modal transit hub. It is critical that the Central Corridor LRT proposal and Union Depot proposal are consistent in describing the proposed projects. We recommend that close coordination occur between our offices to ensure consistency between the two projects. The proposed use of the Union Depot by the Central Corridor LRT will help define the purpose and need for the Union Depot multi-modal facility.

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

3. We recommend that the FHWA be included in the development of a traffic management plan as part of the mitigation for traffic impacts.



We thank you for the opportunity to comment on the SDEIS. Please feel free to contact me with any questions regarding our review of the document and future coordination. I can be reached at (651) 291-6120.

Sincerely yours,



Cheryl B. Martin

Environmental Engineer

CBM/jer

cc: 1 FTA – Bill Wheeler  
1 Martin  
1 RF  
DMS – “FHWA Comments on Central Corridor SDEIS”

- The SDEIS needs to address the specific changes in traffic volumes (average and peak) on all potentially affected area streets, changes in traffic patterns, cut-through traffic, and increases in miles driven due to more circuitous routes. The reference to traffic moving over to West River Road and the road having sufficient capacity to handle it does not identify specific, quantitative impacts to West River Road and other area streets that will experience significant increases in traffic volume and changes in traffic patterns.
- Refer to Areas of Concern Figure for several identified concerns re: specific intersections and roadways.

### **1.3.2. Parking**

Parking impacts due to the elimination of parking proposed by the CCLRT and cumulative impacts from projects such as the Gopher Stadium, proposed commercial and residential complex development in conjunction with increasing parking needs will have a direct impact on residents, neighborhoods, and businesses. In addition the loss of parking will impact neighborhoods with increased “park-n-hide” parking near the University of Minnesota, near the LRT Stations and along the corridor in general. These parking impacts need to be addressed along with the additional traffic impacts from the vehicles driving through the neighborhoods while “park-n-hiding”.

The SDEIS needs to address:

- The major reduction in parking spaces (from 1150 to 175) along University Ave. and the related impact on local businesses. These are primarily “fine texture” business where customers stop in, make a purchase, and drive off. Parking needs to be very close, within an easily walkable distance, to the businesses in order for the customers to use them.
- The potential use of neighborhood parking permits would be disastrous for area businesses. Parking permits are for residents only and would preclude customer parking for area businesses. Who would pay for the permits and the administration of a permit process? The local businesses and communities do not want to bear this cost.
- Access to parking areas impacted by closing of Washington Avenue (Washington Avenue Ramp) and by changes in traffic patterns.
- The loss of affordable student parking in the vicinity due to the Stadium construction and other current and future projects.
- The more circuitous routes that will need to be taken to available parking areas.
- University student, administration, bio-complex staff (estimated to be 5,000), etc. parking needs that are continuing to grow.
- The impact of traffic being drawn to the area to get to stations and the LRT (park-n-hide). University students, administration, and others park and take the bus.

### **1.3.3. Pedestrian and Bicycle Access and Safety**

The studies related to diverting traffic from Washington Avenue only address the operational characteristics of the traffic flow. The impact that the increased traffic volumes, loss of the Mall, and street modifications have on bus service and bicycle or pedestrian movements along these routes needs to be addressed.

The SDEIS needs to address:

- Pedestrian and bicycle access to bus stops, crossing University, Franklin and other streets that will be experiencing higher traffic levels.
- The cumulative impact on sidewalks, bicycle routes, the generation of new crossing needs, and methods of dealing with new and existing access and crossing needs.

## **2.0 SPECIFIC ISSUES**

The following section discusses examples of issues related to specific project elements.

### **2.1. LRT Stations**

- Vehicular traffic on all impacted area streets generated by closing Washington Ave. to vehicles, vehicles accessing to the LRT stations and more circuitous routes take by vehicles.
- The effect on short length bus service and access to bus stops
- The effect on pedestrian and bicycle routes, access, and bicycle parking.
- Park and hide, where will people park, what measures will be taken to reduce the potential for park and hide behavior? What will be the effect of additional vehicles parking in areas that are already problematic? What is the impact of this additional parking need, combined with additional traffic and pedestrian/bicycle traffic?

### **2.2. Mall**

- Vehicular traffic on all impacted area streets generated by closing the Washington Ave. to vehicles and more circuitous routes take by vehicles.
- The effect on short length bus service
- The effect on pedestrian and bicycle routes, access and bicycle parking.
- Where will additional parking be provided (ramps and small local lots within walkable distance of businesses)?
- Consider developing bike route on Mall.
- Evaluate the need for additional pedestrian overpasses.

### **2.3. University Avenue**

- One of the biggest projected concentrations of traffic is at University Avenue and 4<sup>th</sup> St- projected to increase at least 50% when the Mall is closed to traffic. This impact may be



significantly underestimated as the cumulative effects of other projects and the indirect effects of this project may not have been included.

- The effect of the loss of parking
- The effect on businesses
- The effect on the appearance and feel of University Avenue and adjacent areas
- Consider the opportunity to bury Xcel power lines through the Prospect Park Neighborhood
- The effect on short length bus service and access to bus stops
- The effect on pedestrian and bicycle routes, access, and bicycle parking. Where will additional parking be provided (ramps and small local lots within walkable distance of businesses)?
- The effect of park and hide, where will people park, what measures will be taken to reduce the potential for park and hide behavior? What will the effect of additional vehicles parking in areas that are already problematic? What is the impact of this additional parking need, combined with additional traffic and pedestrian/bicycle traffic?
- The concept of allowing parking along University in off-peak hours would reduce the parking impact and the potential noise and vibration impacts to staff that work in offices immediately adjacent to University Avenue.

#### **2.4. Franklin Avenue**

- The effect of increased traffic is a major issue.
- Potential effects on the Franklin Prospect Park Historic Neighborhood-need to be careful how propose to route traffic in the area and deal with parking in this area. The impacts and mitigation measures need to comply with historic neighborhood criteria and goals.
- The effect on short length bus service and access to bus stops
- The effect on pedestrian and bicycle routes, access, and bicycle parking.
- The effect of park and hide, where will people park, what measures will be taken to reduce the potential for park and hide behavior? What will be the effect of additional vehicles parking in areas that are already problematic? What is the impact of this additional parking need, combined with additional traffic and pedestrian/bicycle traffic?

#### **2.5. Raymond Avenue**

- The effect of traffic increase on this N-S connector. The neighborhood requests close coordination regarding a Raymond Ave. traffic calming study and related development of mitigation measures.
- Similar to the potential effects on Prospect Park, impacts and mitigation measures need to comply with historic criteria.

## 2.6. Other

- This project provides an opportunity to enhance Tower Hill Area, provide gateways to St. Paul and Minneapolis, and other opportunities.
- Bicycle lockers seen at other stops are ugly, can we get some more attractive ones.
- Potential for impacting wetlands, particularly at 280/Energy Park/Como intersection.
- Signals at Weissman Museum intersection. An expansion of the Museum has already been approved in the Washington Avenue bridge area.
- Access to I-35W at both Washington and University/4<sup>th</sup> Street needs to have adequate mitigation to address the regional mobility along with community mobility from a pedestrian, bicyclist and local motorist perspective.

## 3.0 MITIGATION MEASURES

### 3.1. Parking

Some of the traffic concerns may be mitigated through developing an efficient parking plan for the corridor that will not only mitigate lost parking, but to decrease the miles driven to the parking along the corridor.

- Near the University of Minnesota much of the traffic diverted from Washington Avenue is traffic heading to the University parking lots. New parking should be established at the major entrances to the University and bus service from the new lots could efficiently circulate through the campus. New lots near I-94 and Huron, I-35W at both Washington and University/4<sup>th</sup> Street would significantly reduce the traffic on the local streets. (The model for this would be the I-394 parking garages in Minneapolis as shown in the Example University Area Parking Concept figure.) Possible sites for new parking ramps in the University Area are indicated on the same figure. The site along Washington Avenue should be incorporated into the West Bank Station Area Planning and coordinated with the West Bank Community Development Corporation. Additional studies should be conducted at other major intersections -- Fairview, Snelling, and Lexington to see if park-n-hiding is a problem there as well, and if parking ramps would be needed at one or more of those stops.
- A specific block by block parking plan to provide parking to area businesses (within short walkable distance) and to deal with other parking issues is necessary to develop an effective parking plan. This plan should incorporate "pocket parking" areas, possibly replacing lots or businesses that are, or may become, vacant.
- Transit rider parking near each station needs to be identified and incorporated into every station area plan. Even though the Metropolitan Council has expressed that they want to discourage this type of parking, in reality it will occur and the neighborhoods will suffer if the parking is not incorporated in the project.

### 3.2. Pedestrian and Bicycle Mitigation

Corridors that are forecasted to receive increased traffic due to the project need mitigation to ensure safe travel for traffic along with pedestrians and bicycles. Traffic calming measures

or redesign of the streets with “Complete Street” concepts will be required. The following are potential mitigation alternatives for pedestrian and Bicycle impacts due to the project.

- All corridors that have increased traffic due to the project, such as Franklin and Raymond Avenues, need to have adequate traffic calming.
- A bicycle route along the Washington Avenue Mall should be added.
- Consideration should be given to additional pedestrian bridges over the Washington Avenue Mall

### 3.3. Level of Service Mitigation

Improvements at intersections that currently experience congestion problems must be part of the plan. Consideration of new street connections that provide alternatives to avoid congested intersections should be considered in the Level of Service mitigation. Roundabouts, bike lanes and accessible crosswalks must be considered in the redesign of intersections. All intersections that experience an unacceptable level of service need a mitigation plan. The following are potential mitigation alternatives for some of the intersections identified.

- The intersection of East River Road/Franklin/27<sup>th</sup> could be redesigned with a roundabout along with an underpass for the East River Road traffic.
- University Ave/4<sup>th</sup> St interchange with I-35W congestion could be reduced by providing new access at Hennepin Avenue at I-35W. The diverted traffic along Hennepin Avenue should also have adequate analysis and mitigation to safely handle the pedestrian, bicycle, transit and increased vehicular traffic.
- University Ave/4<sup>th</sup> St from I-35W across campus should be restriped to provide additional traffic lanes at a narrower width. The narrower width will reduce the speeds of the traffic through this high pedestrian and bicyclist area.
- Considerations of adding north/south crossing of the Railroad yard would provide alternative routes and reduce the traffic along University Ave/4<sup>th</sup> Street. Crossings are proposed in the SEMI redevelopment and the Grand Rounds projects.

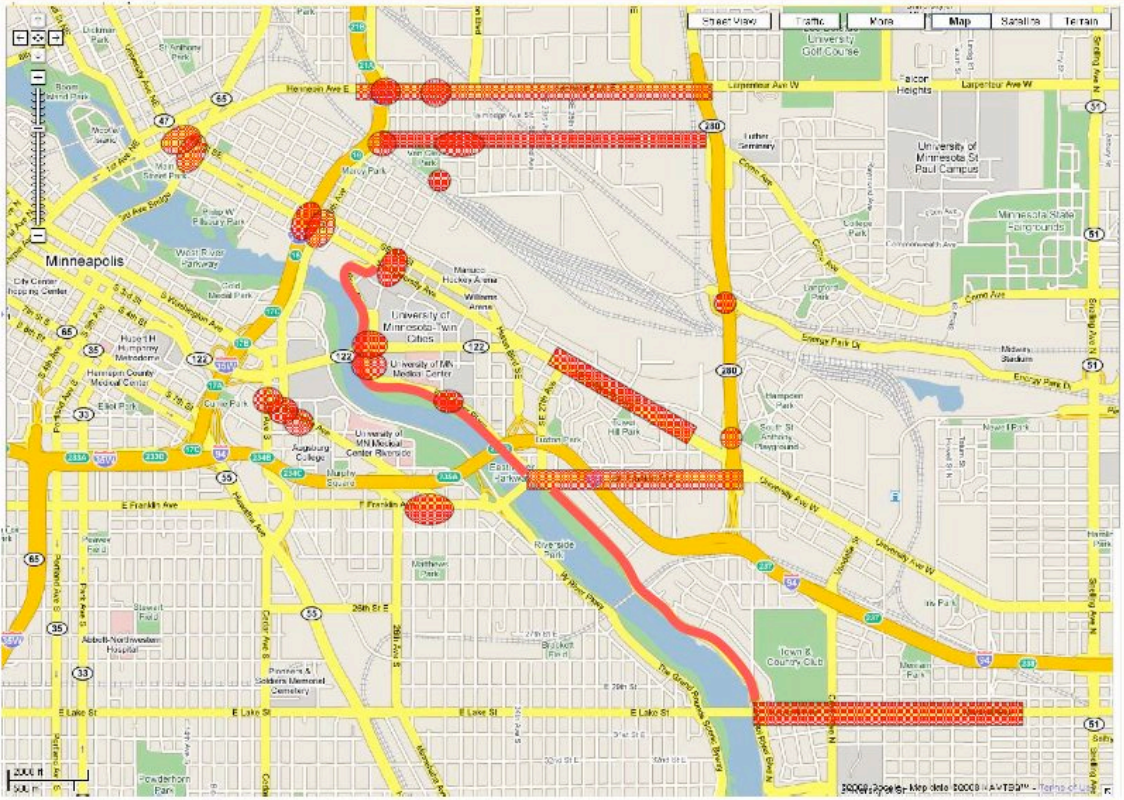
Sincerely,  
**Howard R. Green Company**

A handwritten signature in black ink that reads "Jack Broz". The signature is written in a cursive style and is positioned above a horizontal line.

Jack Broz, P.E.

w/attachment

**Retaining an Attractive Place to Live and Work Through Construction and Enhancement of the Central Corridor LRT**



Neighborhood	Areas of Concern
PPERRIA	<ul style="list-style-type: none"> <li>Franklin &amp; 27th &amp; Riverside Intersection</li> <li>Franklin Avenue from River to Hwy 280</li> <li>University from border to 27th</li> <li>All of East River Boulevard</li> </ul>
SECIA	<ul style="list-style-type: none"> <li>Hennepin Ave, 1-35 to 280</li> <li>Como Ave, 15th to 18th in particular, Rest of Como Ave</li> <li>15th Ave &amp; Rollins</li> <li>15th &amp; Como</li> <li>11th &amp; Como</li> <li>11th &amp; Hennepin</li> <li>18th &amp; Como</li> <li>15th &amp; Hennepin</li> <li>15th &amp; Como</li> <li>15th &amp; 17th</li> <li>15th and Rollins</li> </ul> <p>Changes from:</p> <ul style="list-style-type: none"> <li>Granary Road</li> <li>Kasota Changes</li> <li>Grand Rounds Completion</li> </ul>
Marcy-Holmes Intersections	<ul style="list-style-type: none"> <li>35W &amp; University Ave SE /4th St SE</li> <li>10th Ave &amp; University Ave SE/4th Street SE</li> <li>15th Ave &amp; University Ave SE/4th Street SE</li> <li>East River Road &amp; Washington Avenue</li> <li>Pleasant Street and Washing Avenue</li> <li>Central Avenue and University Ave/4th St.</li> <li>E. Hennepin &amp; University Ave/4th St.</li> <li>How will buses be re-routed: #16 NS #2</li> <li>What is the estimate of exhaust, noise, and life-threatening traffic impacts</li> <li>Degradation of historic/cultural resources from incremental increased in traffic</li> </ul>
University District	<ul style="list-style-type: none"> <li>Stadium Village business operations</li> <li>Pulton and East River Road</li> </ul>
Cedar-Riverside	<ul style="list-style-type: none"> <li>Riverside Avenue/20th Avenue S</li> <li>Riverside Ave/19th Avenue S</li> <li>Riverside Ave/Cedar Ave</li> </ul>
St. Anthony Park	<ul style="list-style-type: none"> <li>Hwy 280 and intersections with</li> <li>o Territorial</li> <li>o Energy Park Drive</li> <li>o Granary Road connections into St. Anthony Park</li> </ul>
Union Park	<ul style="list-style-type: none"> <li>Marshall Avenue traffic increases</li> <li>East River Road traffic increases</li> </ul>

# Areas of Concern: Traffic

District Councils Collaborative of Saint Paul and Minneapolis • Central Corridor LRT



**Key Element 3. Stations at Western, Victoria, and Hamline**

The DCC was pleased that Stations at Western, Victoria, and Hamline were identified as a Key Element for evaluation in the SDEIS. In its comments on the DEIS, the DCC supported inclusion of these stations, which would serve Environmental Justice populations on the eastern end of University Avenue. In its comments on the Work Scope for the SDEIS, the DCC requested a rigorous analysis of impacts that would result from a delay in the construction of these stations. The DCC also called for development of appropriate mitigation strategies should the stations not be built as part of the CCLRT project. We are concerned that the SDEIS does not include a more thorough analysis of Environmental Justice considerations.

According to the U.S. Department of Transportation (<http://www.fhwa.dot.gov/environment/ej2000.htm>), there are three fundamental environmental justice principles.

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environment effects, including social and economic effects, on minority populations and low-income populations
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations

The SDEIS identifies many socioeconomic, land use and neighborhood benefits to be gained from the construction of stations at Western, Victoria, and Hamline, including an elevation in neighborhood stature. However, the SDEIS project description only includes construction of the underlying infrastructure for these stations, and no indication of when station build out will occur other than when ridership and finances allow (p. 3-152) — a standard that apparently has not been applied to all stations in the project, because the project includes the Capitol East station which, according to project documents, has a lower ridership projection (450) than the Hamline station (490).

In the Environmental Justice Section, the SDEIS states that “minority or low-income populations within the study area are not subject to any disproportionate impacts associated with the development of the Central Corridor LRT; furthermore, the benefits of the project are fairly distributed. No mitigation is proposed at this time” (p. 3-153). The DCC questions this conclusion.

- a. SDEIS thematic maps show concentrations of minority or low-income populations in the Midway East segment of the corridor where the proposed stations would be located. This information concurs with other maps, research, and data submitted by the DCC to be part of the Public Record.<sup>1</sup> Recent analysis of populations within a quarter mile of stations included in the project shows that, on average, approximately 40 percent are minority. Populations within a quarter mile of the stations excluded from the project are, on average, approximately 80 percent minority. This simple comparison demonstrates that environmental justice populations are not distributed uniformly throughout the corridor and, 40 percent minority populations around stations that are included in the project would receive substantial benefits,

---

<sup>1</sup> *Additional Stations: Making the Case*. Mary Kay Bailey and the District Councils Collaborative of Saint Paul and Minneapolis, November 2007; presentation to Central Corridor Management Committee, December 12, 2007.  
*Central Corridor Stations at Western, Victoria, and Hamline: Community Report*. District Councils Collaborative of Saint Paul and Minneapolis, March 2008.  
*Metropolitan Council Listening Session Testimony and Written Comments*. District Councils Collaborative of Saint Paul and Minneapolis, February 11, 2008.  
*Supplemental DEIS Comments*. District Councils Collaborative of Saint Paul and Minneapolis, March 26, 2008.

while the 80 percent minority populations around Western, Victoria, and Hamline would suffer adverse impacts due to limited LRT access. (see Table 1.)

**Table 1. Central Corridor LRT Minority Population by Stations.** Prepared by Minnesota Center for Environmental Advocacy. August 2008.

Station	Total Population	Hispanic	White (Non-Hispanic)	Black	Native American/ Alaska Native	Asian	Hawaiian/ Pacific Islander	Other (All Categories)	Total Minority Population	%Minority
HHH Station	133	12	77	37	2	3	0	4	56	42.11
U of M West Bank	892	32	565	94	5	172	4	44	327	36.66
U of M EastBank	580	20	496	23	2	36	1	5	84	14.48
Stadium Village	2733	68	2153	94	9	364	2	88	580	21.22
29th Avenue	1749	49	1123	298	51	161	0	134	626	35.79
Westgate	583	10	516	29	2	19	1	13	67	11.49
Raymond Avenue	342	14	261	43	4	17	0	6	81	23.68
Fairview Avenue	1674	172	1069	274	59	54	0	92	605	36.14
Snelling Avenue	1642	106	932	423	45	97	1	77	710	43.24
Hamline Avenue	1970	69	603	882	32	224	0	320	1367	69.39
Lexington Avenue	1545	87	603	529	17	278	6	56	942	60.97
Victoria Street	2944	210	461	1311	31	845	2	170	2483	84.34
Dale Street	2856	160	375	1264	34	901	2	242	2481	86.87
Western Avenue	3417	393	480	989	45	1360	1	299	2937	85.95
Rice Street	1365	232	248	449	42	304	9	171	1117	81.83
Capitol East	1140	63	484	295	10	262	0	52	656	57.54
10th Street	2370	115	1571	519	20	129	0	32	799	33.71
6th & Cedar	3738	251	2666	551	26	213	2	60	1072	28.68
4th Street Station	1701	160	1234	166	14	109	2	34	467	27.45
StPaulUnionStation	2524	87	2024	219	25	137	3	61	500	19.81

*These figures represent the population within one-quarter mile radius of the proposed transit stop.*

*Data is taken from Census 2000 block level data; blocks which fall fully or substantially within the .025-mi buffer were included; i.e. 'slivers', 'splinters' or prorrptions (thin extensions, panhandles) were excluded.*

**average 79.89% percent minority population at Hamline, Victoria and Western vs. average 38.92% minority populations at all other stations**

b. SDEIS analysis finds that construction of infill stations would yield the following benefits:

- improve transit service (p. 3-55)
- improve neighborhood cohesion (p. 3-55)
- encourage pedestrian activity (p. 3-55)
- improve connectivity because of half-mile spacing (p. 3-55)
- attract development and redevelopment activities on underutilized parcels within one-quarter mile of the proposed stations which would be the result of natural market forces (p. 3-30)
- improve access to a regional retail center and nearby medical facilities (p. 3-30)
- serve as a development catalyst (p. 3-33)
- add to the stature of adjacent neighborhoods and serve as focal points of daily activity (p. 3-55)
- ensure that areas around these stations would be subject to the City of Saint Paul's Transit Overlay Zone (TOZ) guidelines for station areas and benefit from multi-disciplinary City TOZ implementation teams which would help facilitate desired change (p. 3-30)

This list of benefits is associated with the physical presence of LRT stations and, according to many socioeconomic and transit measures, benefits begin to diminish outside a ¼-mile radius of the station. LRT stations are not uniformly spaced throughout the Central Corridor. In fact, they are spaced twice as far apart (one mile) in Environmental Justice neighborhoods on the eastern end of University Avenue as they are elsewhere in the corridor. Significant portions of these Environmental Justice neighborhoods will not realize the above benefits because they are outside the ¼-mile radius; until the stations are built, they would bear a disproportionate delay in receiving the benefits of this project. *The FEIS must address this obvious disparity.*



- c. The delay in the receipt of benefits would be further exacerbated by the reduction in the frequency of the Route #16 bus service, which reduces access to transit. According to the SDEIS, off-peak frequencies would be cut by 67 percent and peak frequencies would be cut by 50 percent. This cut in service decreases access to transit service and makes it more difficult for residents and businesses to realize LRT benefits when they are located half way between stations spaced one-mile apart. The service cuts also fall disproportionately to low-income, #16 transit riders. According to 2006 Metro Transit Survey data, 41 percent of #16 transit riders have annual household incomes of \$15,000 or less while only 22 percent of the #50 transit riders (equivalent of LRT users according to the SDEIS) have household incomes of \$15,000 or less. This same statistic applies to transit riders system wide. The Transit Survey did not collect data about race and ethnicity. Proposed #16 frequency cuts are yet another disproportionate impact deserving full consideration in the SDEIS. *The FEIS should investigate whether or not similar disproportionate impacts would fall upon minority populations.*
- d. The SDEIS discloses one notable adverse impact of the stations: the elimination of on-street parking. This results because the project has chosen to reduce parking rather than reduce the number of traffic lanes or the length of turn lanes on University Avenue (p. 6-20). This adverse impact would occur near most stations throughout the corridor, however, stations do offer certain economic benefits that may offset the loss of on-street parking (see above) and redevelopment opportunities that could incorporate structured parking. If stations at Western, Victoria, and Hamline are not built as part of the project, environmental justice populations would experience the adverse impacts of on-street parking without the balancing benefits of an LRT station. *The FEIS should analyze and document the disproportionate impact and propose appropriate mitigation measures.*

As explained in comments prepared for the DCC by Howard R. Green, "The cost effectiveness index implemented by FTA should not limit the types or level of detail of impact assessment or what mitigation measures can be considered. The environmental review process should be conducted without regard for the effect it has on the [Cost Effectiveness] Index" (see page 3 of Howard R. Green comments). This same rule should apply to Environmental Justice concerns as it does to Transportation Effects. NEPA Implementation Supervisor, Kenneth Westlake, alludes to this in his SDEIS Works Scope comment letter of March 2008 where he states that cost appears to be the factor for dropping these stations. He goes on to say that the "SDEIS should provide a clear explanation of what factors...justify which stations are retained for detailed analysis or dropped from further consideration. Cost alone appears to be an insufficient basis, since most of the stations have similar costs."

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

#### **Key Element 4. Capitol Area Alignment/Stations**

The SDEIS shows the alignment shifting to the south side of University Avenue immediately east of Marion Street and staying on the south side until it turns south on Robert Street. The shift in the alignment yields engineering and operational efficiencies, but results in:

- a. relocating the LRT station to the east side of Rice Street — Through the station location/station area design process the focus of this station has shifted from a more open, inclusive design to one that is oriented to the State Capitol and facilitation of visitor and employee movement into the Capitol Complex. In essence, the station has turned its back on the residential community surrounding it. This is an especially sensitive issue for the redevelopment of Rice Street north of University Avenue, which would benefit from association with an LRT station.
- b. eliminating all access from University Avenue to parcels on the south side of the street — For most property owners this is not a problem, however, it is our understanding that for one particular immigrant business owner this means total loss of access to his property.
- c. Re-routing the #16, possibly going into downtown Saint Paul via Rice Street rather than MLK Boulevard. The SDEIS does not disclose impacts of re-routing on transit riders. Adverse impacts may include longer walk trips for #16 bus riders visiting or working in the Capitol area, longer walk trips to the LRT station at Rice, and longer bus transit travel times into downtown Saint Paul.

*The FEIS should:*

- *Identify station and station area design strategies that address the loss of community cohesion as a result of shifting the station east of Rice Street and orienting it to Leif Erikson Lawn.*
- *Analyze the impacts of re-routing the #16 and develop appropriate mitigation measures to ensure pedestrian safety and a suitable pedestrian environment for those who may be required to walk greater distances.*
- *Detail mitigation strategies for business owners who lose access to their properties not only here, but elsewhere on the corridor.*

### **Key Element 5. Downtown Saint Paul Alignment**

The SDEIS documents revisions to the preferred LPA through downtown Saint Paul: shifting the tracks to the east side of Cedar; combining the 6<sup>th</sup> Street and 4<sup>th</sup> Street stations into one which will be on a diagonal from 5<sup>th</sup> & Cedar to 4<sup>th</sup> Street; shifting the tracks to the south side of 4<sup>th</sup> Street in front of Union Depot and then continuing mid-block between Wacouta and Wall Streets to the proposed maintenance facility on the Conesco site. The DCC understands that details of the alignment from the Union Depot to the maintenance facility are still being worked out. The DCC supports this general alignment, but has identified several issues that need to be addressed in the FEIS along with proposed mitigation strategies, if appropriate.

- On Cedar, between 10<sup>th</sup> and Exchange Streets are two historic churches with active congregations and community-oriented programs that fulfill the mission and goals of their religious communities. The SDEIS discloses certain short and long-term adverse impacts, such as obstruction of access during construction, vibration impacts on the structures, noise impacts, limited pedestrian access across Cedar, and visual impacts on church facades—Central Presbyterian in particular. What is not well disclosed are the impacts on community cohesion caused by the alignment disrupting and in some instances severely impeding use of the main entry of the churches for ceremonies, such as funerals and weddings. The DCC understands that many of the environmental and transportation impacts have been satisfactorily mitigated, however, impacts on community cohesion have yet to be resolved. *The FEIS must fully analyze and disclose community cohesion impacts and document mitigation or other strategies developed to address the impacts.*

- The DCC supports the consolidation of the 4<sup>th</sup> and 6<sup>th</sup> Street stations into one central station that can also become a hub for multi-modal transfers. This alignment does remove a critical link in the skyway network through downtown Saint Paul. The skyway network supports the convention and hospitality industry and augments movement through the downtown. *The FEIS should document how this adverse impact on pedestrian circulation in the downtown will be mitigated.*

### Key Element 6. Traction Power Substation Locations

The SDEIS discloses the general location of Traction Power Substations (TPSS). The DCC understands that for optimal operation TPSS facilities need to be sited no more than one mile apart and no more than 500' from the tracks. A TPSS is one story in height, about the size of a boxcar, and requires a site that is 45' X 80', which allows for a safety zone around the building. These facilities are industrial in character, but they can be screened with materials that are compatible with their surroundings. It is also possible to put these facilities inside of buildings or underground.

A TPSS can have visual impacts and require acquisition of land parcels. It does generate minor noise, 40 to 50 dBA at a distance of about 100' from the facility. The SDEIS states that facilities will be enclosed and lined with acoustical material, to reduce noise levels by 5 dBA (p. 4-53). A TPSS is not known to emit electricity. Electromagnetic impacts have not been determined. LRT operations staff access and monitor TPSS facilities to ensure smooth operations.

Several TPSS sites are in locations where:

- land is underutilized and therefore prime for many different types of redevelopment, including mixed-use and residential;
- residential and/or small scale commercial land uses currently exist;
- existing buildings nearby are several stories higher than TPSS; and
- historically designated structures stand.

The table below identified particular TPSS facilities and concerns about their location.

TPSS Location	Issues of Concern
CC-2, West Bank	In area that will be "urbanized" to be more pedestrian friendly
CC-5, Raymond	Substation near multi-family housing tower, visible from residences above — minimize visual impacts
CC-7, Hamline / Albert	Prime site for mixed-use redevelopment — minimize visual impacts and site to maximized developable land
CC-8, Victoria	Among small scale, older buildings, possibly single and multi-family housing— need to attend to visual, noise, and construction impacts
CC-9, Dale	Prime site for mixed-use redevelopment— minimize visual impacts and site to maximized developable land
CC-10, Western	In area that may be redeveloped — minimize visual impacts and site to maximized developable land
CC-11, Capitol East	In or near historic district — minimize visual impacts
CC-12 & 13, Downtown St. Paul	Near historic buildings and visible from offices, etc. above — minimize visual impacts, preferable to house inside a building or below ground

*(Identification codes refer to Preliminary Engineering Plans prepared for the Municipal Consent process.)*

***The FEIS should disclose the final locations of each TPSS and detail mitigation strategies for all impacts at street level and from above.***

The DCC notes that TPSS locations between Lexington Avenue and Rice Street are spaced much closer than required. There are Environmental Justice populations in this area and the development pattern is more finely grained and residential in nature. The SDEIS does not adequately discuss the impacts in light of stations at Western, Victoria, and Hamline not being built-out until some unknown future date.

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

### **Key Element 7. 3-Car Train Requirement**

The SDEIS discloses that the CCLRT will be constructed for eventual three-car train operations. To ease facilitation of conversion to three-car trains and to minimize future construction costs, LRT platforms will be 300' long. This change from the AA/LPA results in additional loss of on-street parking, even in areas where stations will not be built until some unknown time in the future.

The entire corridor will be adversely impacted by loss of on-street parking. The adverse impacts may be more acute in areas where off-street parking options are limited and in areas where infrastructure for LRT stations is provided, but the stations are not built out. The unbuilt stations at Victoria and Western would serve commercial areas with high concentrations of minority and immigrant businesses. There would be disproportionate impacts on minority business populations located near these intersections. There also are potential community cohesion impacts if the Southeast Asian business community is dispersed due to financial hardships caused by the CCLRT project. The larger Southeast Asian community would no longer have this long-established economic center, and the established social fabric in adjacent neighborhoods would suffer if minority business owners who live in these neighborhoods are forced to relocate.

*The FEIS should include an analysis of these impacts and propose mitigation strategies.*

A 300' platform will improve pedestrian access and safety where blocks are 300' long, e.g. downtown Saint Paul. Pedestrians will have the advantage of crosswalks found at the intersection. In areas where blocks are 600' long, mostly on University Avenue in Saint Paul, the platform will end mid-block and pedestrians will be disadvantaged and possibly put in an unsafe situation if they attempt to cross vehicular traffic to catch a train.

*The FEIS should identify and evaluate alternatives for addressing this basic pedestrian safety concern and disclose final design alternatives.*

### **Key Element 8. Vehicle Maintenance and Storage Facility**

The SDEIS discloses the need for a maintenance facility and discusses three alternative sites. The "Conesco" site, east of Union Depot and just north of the Mississippi River is the preferred location. The SDEIS concludes that facility is not expected to have any adverse impacts on community cohesion (p. 3-33).

The DCC evaluated this location for impacts on neighborhood land use plans and the City of Saint Paul Comprehensive Plan. The DCC is concerned that the preferred site may be in conflict with the City's Comprehensive Plan and that neighborhood plans for connections to the Mississippi River may not have been given full consideration. (CapitolRiver Council SDEIS comments provide an extensive review.) It also does not appear that the SDEIS considered neighborhood plans for this site and the surrounding area. The DCC is concerned that the CCLRT project may preclude redevelopment opportunities and inhibit expansion of the bicycle and pedestrian network in this area.

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

#### **Key Element 9. Washington Avenue Bridge**

The SDEIS reports that the Washington Avenue Bridge over the Mississippi River can be made ready for LRT operations without total reconstruction. Modifications are needed to remedy its "fracture-critical" design and to ensure it has the structural capacity to endure an extreme loading combination and fatigue under repetitive loading (Trains would be crossing the bridge every 7.5 to 10 minutes.) Modification details will be part of the FEIS.

*The DCC remains concerned about the age and condition of the Washington Avenue Bridge and potential incongruence with the new LRT facility, which will have a long lifespan. The FEIS has only a 10-day comment period, which is a very limited time for public disclosure and debate around a critical element of the project. Leading up to the FEIS, the CCLRT project should disclose to the public incremental findings of bridge studies, which would allow for adequate public review and for decisions-makers to take public input into account.*

### **Additional SDEIS Comments**

#### **A. Loss of On-Street Parking —**

Current CCLRT information indicates that 85% (985) of the on-street parking spaces will be lost if all mandatory and desired design elements are included in the project. CCLRT Project Partners have been working intensely over the last two months to find ways to restore lost spaces, to identify off-street and side street parking options, and to develop creative parking agreements and programs to ameliorate what community members and business owners regard as a crisis.

The DCC shares community and business concern about the severity of on-street parking loss. This loss will threaten the viability of individual businesses and negatively impact residential neighborhoods that are near and, in some cases, on University Avenue. It will also negatively impact the vitality of University Avenue as a whole.

In the interest of retaining as much on-street parking as possible, the DCC supports investigation into a wide range of options including, but not limited to re-thinking such "mandatory elements" as the number of through travel lanes, using the outside lane for parking in off-peak hours, and strategic placement of pedestrian crossings.

*The FEIS should provide a more complete documentation of the impacts of on-street parking loss and proposed mitigation strategies.*

#### **B. Bus Transit Service Within and To Central Corridor**

The SDEIS states that the frequency of the #16 bus route will be reduced from the AA/DEIS assumption of every 10 minutes all day to every 30 minutes during off-peak hours and every 20 minutes during peak hours. The DCC is concerned that this level of transit serve will not ade-

quately serve the needs those whose trips do not begin or end within a quarter mile walk of an LRT station.

This concern is based on analysis of data from the Metro Transit fall of 2005 Transit Rider Survey. A comparison of #16 survey responses to survey responses system wide tells us that #16 transit use patterns and rider characteristics are significantly different from system-wide patterns and characteristics. We include a few highlights of findings from our analysis below.

- #16 riders are more likely to be from low-income households than transit riders system wide
  - 41% of #16 riders have household incomes under \$15,000 compared to 23% of all riders surveyed
  - 60% of #16 riders have household incomes under \$25,000 compared to 49% of all riders surveyed
- #16 riders are more transit dependent than transit riders system wide
  - 43% of #16 rider households have no vehicle compared to 31% of all survey rider households
- #16 riders travel more during off-peak than peak hours
  - 60% of #16 trips occur in off-peak hours compared to 45% of all trips system wide
- #16 riders are more likely to use transit for non-work related trips
  - 25% of #16 trips are between home and work compared to 63% of all survey trips
  - 31% of #16 trips are from home to college / university compared to 8% of all survey trips
  - 21% of #16 trips are from home to “other” compared to 7% of all survey trips
  - 6% of #16 are from home to school (K-12) compared to 4% of all survey trips
- #16 trips involve more transfers than transit trips system wide
  - 57% of #16 trips involved 1 transfer or more compared to 31% of all survey trips
- #16 riders are younger than transit riders system wide
  - 48% of #16 riders are under the age of 24 compared to 25% of all riders surveyed

Highlighted findings illustrate that a disproportionate number of #16 riders are from low-income households and from households with no vehicle. And, a greater percentage of #16 riders use the bus in off-peak hours when proposed frequency cuts are the deepest.

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

### **C. Community Involvement (11.0 Public and Agency Coordination and Comments)**

The DCC is committed to meaningful and inclusive citizen engagement in which diverse voices and non-traditional stakeholders participate fully in the decision-making process.

The SDEIS provides a comprehensive overview of Community and Project Partner involvement in CCLRT decision-making. The CCLRT project has developed an elaborate community involvement plan, which includes a team of outreach coordinators assigned to different geo-

graphic areas of the corridor, a Community Advisory Committee (CAC), and a Business Advisory Committee (BAC). CAC meetings are largely informational. Members have little or no opportunity to influence decision-making through this setting, although these meetings do provide a venue in which CAC members can speak directly with Project staff.

The DCC expresses its concern that participation in the CAC and BAC has waned over the course of Preliminary Engineering and that different community groups have felt the need to circumvent the project's involvement process in order to have their voices heard. Actions of community members/organizations and small business regarding loss of on-street parking are one example. The feeling of disenfranchisement has been especially true for representatives of Environment Justice populations many of whom have simply stopped attending CAC meetings. This sentiment has also been heard in public testimony and appears to be understated in the SDEIS.

The DCC raises this issue because community participation in decision-making is identified as a mitigation strategy for Environment Justice issues. If members of those populations are feeling disenfranchised at this juncture in the project, the proposed mitigation strategy will not be effective. We also raise the issue because process for station design and public art is about to begin and there is no public involvement plan for public review and comment. Table 11-1 *Key Project Issues* (p. 11-12) identifies station and public art as one of the few issues the public can influence, yet suggestions from CAC members regarding the public art process have not been fully responded to by the Central Corridor Project Office.

*In its SDEIS Work Scope comment, the DCC proposed an external review of the public involvement process. The primary purpose would be to allow community and business members and organizations, CCLRT Project staff, and Partner Agency staff to speak openly about their concerns and experiences to date, to identify process strengths, and to suggest strategies for improvement. The Citizen Representative to the Central Corridor Management Committee could chair the review process. We believe such a review would be healthy and timely. It is critical to the project's success to have a strong citizen engagement program in place prior to Final Engineering and construction.*

#### **D. Consideration of EIS findings for the extensions of Hiawatha and North Star Corridor**

The DCC notes that EIS statements are being or have been prepared for extensions of the Hiawatha LRT Line and the North Star Commuter Corridor. Since the Central Corridor connects with these projects, we believe the Central Corridor FEIS should acknowledge pertinent findings in the CCLRT Public Record.

#### **E. Technical Comments**

Figure 1-9 *Historic and Projected Traffic on University Avenue, I-94, and Washington Avenue* (p. 1-20). This figure shows decreases in 2030 traffic counts over 1995 and 2005 Counts. When questioned, Project staff suggested this may be an error. If so, it should be corrected because it is misleading and the public may conclude (and has) that there may be more options for resolving on-street parking problems than is the case.

The DCC appreciates this opportunity to comment on the SDEIS work scope and looks forward to your responses.

Sincerely yours,





Carol Swenson, Community Liaison for  
District Councils Collaborative

cc: Central Corridor Management Committee  
DCC Governing Council and Member Organizations

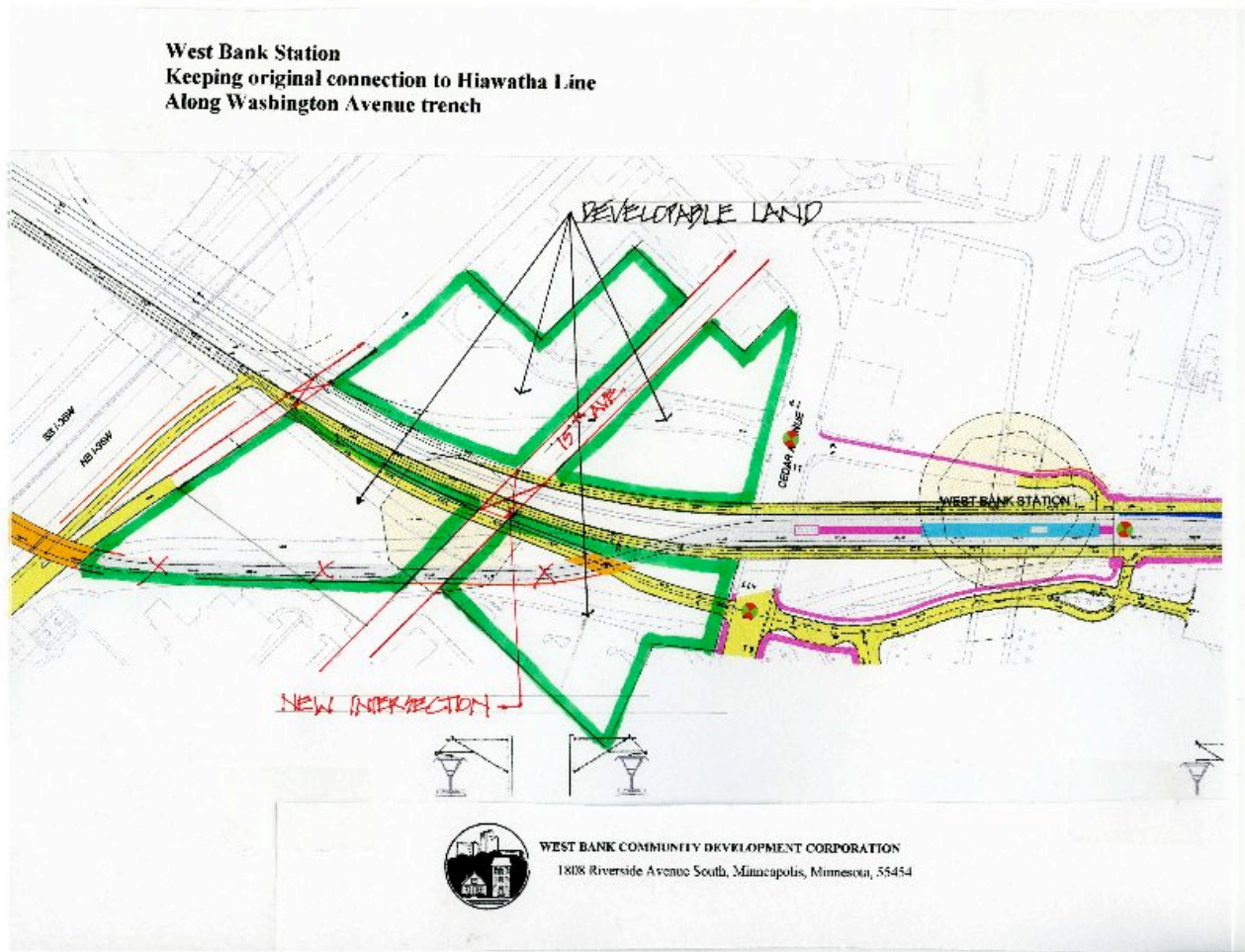
Attachment A. DCC Comments on the SDEIS Work Scope and Responses from the Central  
Corridor LRT Project

Attachment B. West Bank Community Development Corporation Redevelopment Schematic

**Attachment A. DCC Comments on SDEIS Work Scope and Response from Met Council**

<b>DCC Comments on SDEIS Work Scope</b>	<b>Response in SDEIS</b>
<p>1. Stations — the number and location (Western, Victoria, and Hamline); DCC called for:</p> <ul style="list-style-type: none"> <li>a. supplemental ridership analysis</li> <li>b. rigorous analysis of impacts resulting from a delay in construction of these stations</li> <li>c. thorough mitigation analysis</li> </ul>	<ul style="list-style-type: none"> <li>a. no acknowledgement of ridership analysis in SDEIS; CCPO responded in a separate report; it defended 4-Step model used by Met Council; felt FTA would not be receptive to off-model analysis</li> <li>b. SDEIS acknowledges these stations would increase access to transit and offer more redevelopment opportunities; did not discuss impacts of delays in building stations</li> <li>c. SDEIS found there were no disproportionate impacts; benefits are fairly distributed; no mitigation proposed at this time</li> </ul>
<p>2. Station at Cleveland</p> <ul style="list-style-type: none"> <li>a. Requested study</li> </ul>	<ul style="list-style-type: none"> <li>a. SDEIS states that no study was undertaken because neither the county nor the city requested a study</li> </ul>
<p>3. Transit Connectors</p> <ul style="list-style-type: none"> <li>a. Request further analysis of bus transit operations and service needs</li> <li>b. Explanation of measurements used to determine “adequate” transit service</li> </ul>	<ul style="list-style-type: none"> <li>a. The FEIS will document final service proposals, any associated impacts and commitments to mitigation, as needed. (SDEIS presumes Route 16 frequency levels at 20 minutes.)</li> <li>b. See above</li> </ul>
<p>4. Traffic Operations and System Routing</p> <ul style="list-style-type: none"> <li>a. UofM/Washington Ave – areawide analysis of traffic impacts cause by mall; include proposed and probable transportation network improvements and redevelopment plans</li> <li>b. Recommended a multi-faceted mitigation plan that would address direct and indirect impacts; plan should incorporate strategies paid for by the project and those paid for through other strategies</li> </ul>	<ul style="list-style-type: none"> <li>a. Identified as an “Other Comment” to be addressed in FEIS</li> <li>b. SDEIS now includes a section on Indirect and Cumulative Impacts, which includes development trends and transportation improvements</li> </ul>
<p>5. Streetscape design and Reconstruction</p> <ul style="list-style-type: none"> <li>a. Include sustainable, environmentally-friendly design and engineering</li> <li>b. Consider impacts on the pedestrian realm, open space, and green infrastructure opportunities</li> <li>c. Retain and protect existing canopy trees along University Avenue in Minneapolis</li> </ul>	<ul style="list-style-type: none"> <li>a. Identified as an “Other Comment” to be addressed in FEIS</li> <li>b. See above</li> <li>c. See above</li> </ul>
<p>6. Citizens/Community Involvement</p> <ul style="list-style-type: none"> <li>a. Request external review by independent auditors</li> </ul>	<ul style="list-style-type: none"> <li>a. Identified as an “Other Comment” to be addressed in FEIS</li> </ul>

**Attachment B. West Bank Community Development Corporation Redevelopment Schematic**







**DISTRICT ENERGY**  
ST. PAUL™

District Energy St. Paul, Inc.  
Hans O. Nyman Energy Center  
76 Kellogg Boulevard West  
St. Paul, MN 55102-1611

Tel: 651.297.8955  
Fax: 651.221.0353  
www.districtenergy.com

August 21, 2008

Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Ave. N., Suite 200  
St. Paul, MN 55104

Re: Written Comments on Supplemental Draft Environmental Impact Statement  
Central Corridor LRT Project

Dear Ms. O'Brien:

On behalf of District Energy St. Paul and District Cooling St. Paul I am pleased to submit our written comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor Project.

We applaud the efforts that have been made to continue to move this vital project forward, and we remain steadfastly supportive of the project. The serious concerns we raised about the impacts this project will have on our critical heating and cooling piping systems were understated in the Draft EIS. Unfortunately, the SDEIS continues to undervalue the adverse, potentially devastating, impact on our small renewable energy companies.

For example, in Section 4.9.5.2 Utilities, Page 4-86, the SDEIS states concerning the Capitol Area Alignments/Stations that "*District Energy's large heating and cooling pipelines would likely be affected, but not substantially. The shallow district heating and cooling distribution systems service 75 percent of the downtown St. Paul area. The modified AA/DEIS LPA alignment is not proposed to extend more than 2-feet bgs in this locations.*" The impact on District Energy's heating and cooling piping in this area is in fact very substantial. The grade cuts and station changes in the modified alignment in this area are now significantly impacting piping that was essentially unaffected in the approved LPA alignment. District Energy raised concerns with the Project Office about impacts resulting from the proposed changes near the capitol well in advance of the SDEIS being published.

The SDEIS also does not accurately document the depth of our piping systems. Section 4.9.3.2 Existing Utilities (page 4-85) states that our chilled water piping is typically located 4 feet below grade and our hot water piping is typically located 6 feet below grade. This too is incorrect. Our comments on the DEIS pointed out that our piping systems are typically 2 to 4 feet below grade and detailed information on the depth of our systems was provided to the Project Office early in the preliminary engineering process.

Some of the routing adjustments in the SDEIS have lessened the impact on District Energy. The revised alignment at 4<sup>th</sup> and Cedar avoids impacts on two very congested blocks. However, other changes, such as those by the capitol, have more than offset the savings the revised alignment achieves.

The Central Corridor LRT Project continues to impact approximately 2 miles of our most critical piping systems. It also continues to impact our fiber optic communication systems which are also used by the State of Minnesota, Ramsey County and City of Saint Paul. The total estimated cost of the impact continues to be approximately \$20 million...\$17.6 million for new piping and fiber and \$2.4 million for demolition. As 501(c)(3) nonprofits, formed "*to lessen the burdens of government*" and serve the energy needs of this community, we do not have the means to cover these costs. Unless funding solutions can be found, all costs will be borne by our small customer base, which would be harmful to all. Neither the DEIS or the SDEIS recognizes the significance this impact could have on downtown Saint Paul building owners and businesses. We and our customers continue to face a serious problem, and construction of this project is potentially just over a year away.

District Energy St. Paul started over 25 years ago with an idea, an idea that has grown to become the most successful district energy system in America. Communities and leaders from around the country and the world continue to flock to Saint Paul to learn and find solutions to secure their community's energy future and reduce their carbon emissions. It is essential that this critically important Central Corridor Project continue to move forward, but not be achieved at the expense of one of Saint Paul's true renewable energy success stories.

Solutions must be found to mitigate the impacts this project is having on District Energy, District Cooling and our customers. To continue to understate, under estimate and even minimize the seriousness of the impacts on our renewable energy program and our customers, first in the Draft EIS and now in the Supplemental Draft EIS, is not an acceptable practice.

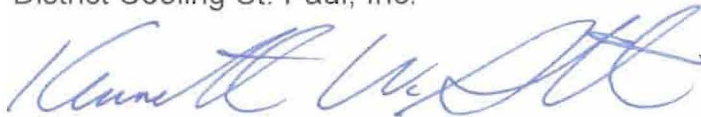
As a result of the information set forth above, we question whether the SDEIS meets the minimum statutory and regulatory EIS requirements.

---

We stand ready to work with the Project Office and with any and all stakeholders and units of government to address the issues in downtown Saint Paul. We look forward to finding solutions to ensure the success of the Central Corridor LRT Project and the continued success of District Energy St. Paul and District Cooling St. Paul.

Sincerely,

District Energy St. Paul, Inc.  
District Cooling St. Paul, Inc.



Kenneth W. Smith  
Senior Vice President and COO

CC: Anders Rydaker, CEO  
William Mahlum, Executive Vice President and General Counsel



Comments for the Supplemental Draft Environmental Impact Statement  
Greater Frogtown Community Development Corporation  
Steve Boland  
Executive Director  
533 Dale Street N  
Saint Paul, MN 55103  
651-789-7486  
[steve@greaterfrogtowncdc.org](mailto:steve@greaterfrogtowncdc.org)

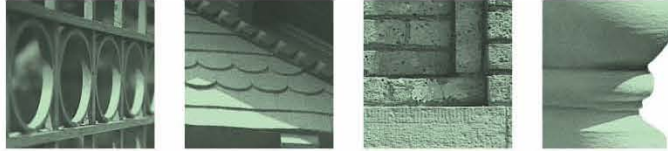
The Greater Frogtown community Development Corporation wishes to comment on the impact of proposed street-parking reductions under the current engineering. We feel this could have potentially devastating impacts on the small-businesses in the area, and the economic environment of the community as a whole.

***Recommendations from the Greater Frogtown Community Development Corporation.***

The Board of Directors of GFCDC calls for the Metropolitan Council and the City of Saint Paul to commit to resolving these parking concerns, including a restoration of some street parking on University Avenue in the eastern section, from Lexington Parkway to Marion. We recommend the following, but recognize this is not a comprehensive list and other ideas may also be valuable.

1. The Metropolitan Council and the City of Saint Paul must agree on **who is responsible for allowing off-peak parking on University Avenue from Lexington to Marion**, and that party should make a public commitment to allow one-lane of traffic in each direction during off-peak hours, reverting to two-lanes of traffic in each direction during peak times.
2. As there will now be signaled intersections at every-other block, the Metropolitan Council should make a public commitment to **remove four of the proposed non-signalized pedestrian crossings in the area from Lexington to Marion to restore additional street parking.**
3. The **Metropolitan Council must commit financial resources** from the Central Corridor Project to **provide remediation of lost street parking.** Such money could be used for better signage from University Avenue to off-street parking solutions, creation of shared parking resources, purchasing land for new shared parking and other solutions.
4. The **Metropolitan Council must commit financial resources** from the Central Corridor Project to **enhance pedestrian safety** on the University Avenue, including such options as physical barriers between the consistent traffic lanes and sidewalk spaces.





## HISTORIC SAINT PAUL

**Board of Directors** August 25, 2008

Steven K. Buetow  
Michael Byrd  
Ruth Dantuma  
John Errigo  
Gar Hargens  
Shawntera Hardy  
Andrew Hine

Kathryn O'Brien, Project Manager  
Central Corridor Project Office  
540 Fairview Avenue North, Suite 200S  
Saint Paul, MN 55104

Dear Ms. O'Brien:

Historic Saint Paul writes to provide comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor Light Rail Transit (CCLRT) Project, located in Saint Paul and Minneapolis, Minnesota.

Virginia Housum  
Brian Horrigan  
Michael Koop  
Shaun McElhatton  
Marcia Moermond

Historic Saint Paul is a nonprofit organization founded in 1998 to lead local preservation-based redevelopment, with a special focus on core city neighborhoods. Historic Saint Paul's mission is to preserve, protect and enhance the character of Saint Paul's neighborhoods. Our 16 member board works directly with multiple partners to educate the community and reach out to those in the most underserved neighborhoods. As advocates for the preservation of Saint Paul's historic resources, Historic Saint Paul works to bring vision, expertise and financial resources to move projects forward with a sensitive approach to historic preservation.

Cheryl Rantala  
Carol Swenson  
Philip Waugh

Historic Saint Paul has read the SDEIS and discussed its findings, conclusions, and mitigation recommendations. These comments relate particularly to Chapter 3.0 and to the "Summary of Cultural Resource Impacts" dated August 2008.

Carol Carey  
Executive Director

These comments will address one historic property proposed for classification in Category 2 (Properties with Some Potential for Adverse Effects): the University-Raymond Historic District; and three historic properties proposed for classification in Category 1 (Properties with High Potential for Adverse Effects): Saint Louis, King of France Church and Rectory, Central Presbyterian Church, and Saint Paul Union Depot.

### **University-Raymond Commercial Historic District**

(Refer to p. 3-82; Table 3-11, p. 3-88; pp. 3-100, 3-103, 3-104, 3-122; "Summary" Table 2, p. 233.)

The University-Raymond Commercial Historic District, including 22 contributing buildings and sites, is a National Register Certified Local Historic District (CLHD), and is also locally designated under the jurisdiction of the Saint Paul HPC.

The character and continuity of University Avenue itself is one of the defining features of the district. The split side station buildings at Raymond Station (between Carleton and

La Salle Streets) have the potential to alter this character, especially from the point of view of pedestrians on either side, but also for drivers or transit riders, whose views of building facades and sidewalks will be partially blocked.

***Careful design of the station buildings, aiming at the greatest possible transparency, will be necessary to mitigate this potential adverse impact.***

### **Saint Louis, King of France Church and Rectory Central Presbyterian Church**

(Refer to p. 3-80; Table 3-11, pp. 3-93, 3-94; pp. 3-97, 3-98, 3-102, 3-104; "Summary" Table 2, pp. 238-239. N.B. Section 3.6 does not mention the churches.)

Central Presbyterian Church is listed on the National Register of Historic Places. Saint Louis Church has been determined eligible. Both churches have active congregations and community-oriented programs that fulfill the mission and goals of their religious communities.

In addressing such issues as vibration and disruption of access during construction, the EIS process rightly acknowledges that not only the physical fabric of buildings but also the well-being of the human community need to be accounted for in assessing the impacts of LRT implementation. By this standard, the SDEIS seriously understates the adverse effects on the two historic churches on Cedar Street. Access to the main entrances – architectural and functional – of both churches would be severely limited, not only during construction but permanently, by the tracks on the east side of Cedar. This is a loss not just of on-street parking and drop-off space but of the day-to-day and ceremonial life of institutions to which ceremony is central. Weddings and funerals, to name only the most obvious examples, will be relegated to secondary entrances. The vital link between the life of these institutions and the life of the street will be broken.

Further, the catenary cable and poles will be superimposed on the canonic view of Central Presbyterian's façade at the end of Exchange Street, a defining view of Downtown Saint Paul, which Section 3.6 of the SDEIS ignores.

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

### **Saint Paul Union Depot**

(Refer to p. 3-80; Table 3-11, pp. 3-96, 3-97; pp. 3-97, 3-98, 3-102, 3-104, 3-115 through 118; "Summary" Table 2, pp. 239-240.)

The Saint Paul Union Depot, listed on the National Register of Historic Places and included in the Lower-town Historic District, includes not only the building (Head House) but also the public open space in front of it to the north and the Concourse extending south to Kellogg Boulevard. The elevated rail yards have been determined eligible.

Because of the location of the station platform on the south side of Fourth Street, the northern part of the public outdoor space will change in character, and the drop-off drive entrances, and access to the drop-off drive, will be lost. The historic use of the building's main entrance – already potentially compromised by the difference in ownership between the Head House and the Concourse – will be further compromised.

***Great care must be taken in the design of the station building relative to the whole of the public outdoor room that extends from the Depot façade to the 1926 Clarence Johnston façade that unifies the buildings on the north side of Fourth Street. The impact of the rail links to the Concourse and the Vehicle Operations and Maintenance Facility on the elevated rail yards structure must also be carefully studied.***

With regard to these historic properties and many others in the inventory, we note that the location of the Traction Power Substations (TPSS) has not yet been studied in sufficient detail to assess potential impacts or propose mitigation strategies.

Please add Historic Saint Paul to the list of interested parties found in Section 11.2.3.

Historic Saint Paul appreciates this opportunity to comment on the SDEIS work scope and looks forward to your responses.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carol Carey", written over a horizontal line.

Carol Carey, Executive Director  
Historic Saint Paul

cc: Central Corridor Management Committee  
Minnesota State Historic Preservation Office  
Minnesota Department of Transportation Cultural Resources Unit  
Saint Paul Heritage Preservation Commission  
Preservation Alliance  
Historic Saint Paul Board

Date: August 25, 2008

To: Kathryn O'Brien, CCLRT Project:

From: Pete Vang, Hmong Business Association

Re: Public Comments on SDEIS

Dear Kathy O'Brien:

On behalf of the Hmong Business Association, I am submitting these comments for the CCLRT SDEIS:

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

Lost of on-street parking must be minimized. On-street parking must be restored in areas where it is needed by small businesses. There must be funding for parking and business mitigation.

Pedestrian safety does not have to be achieved at the expense of businesses losing needed on-street parking. It is a false choice, and disingenuous by the Met Council and the City of St. Paul, to force the community to choose between safety or on-street parking. The Central Corridor LRT project has not shown that many of the decisions contributing to the lost of on-street parking were not arbitrary or preferences of engineers and planners. There was no community process. The project did not sought out input from small business owners about on-street parking. Planners and engineers need to come up with a solution that would not compromise either. Failure to do so is a failure of the CCLRT project, and a failure to serve the small businesses on University Avenue and the communities that depend on those businesses and rely on parking on the avenue.

Sincerely,

Pete Vang

Chair, Hmong Business Association

---

Vang Dental Clinic

365 University Ave. W.

St. Paul, MN 55103

---

To: Metropolitan Council  
From: Art Miller, Owner  
Insty-Prints  
2512 University Avenue  
St. Paul, MN 55114  
Date: August 27, 2008  
Re: Public Comment on the CCLRT Parking Impacts/Solutions

My name is Art Miller and I own a business at 2512 University Avenue in St. Paul. I have completed the Central Corridor LRT Business Survey and met with my Community Outreach contact, Rita Rodriguez. I would like the City of St. Paul and the CLRT Project Office to understand what the loss of on-street parking would mean to my business. In addition, I have some ideas for potential solutions.

At least 95% of my customers drive to my business. They park on University Avenue to pick up printing supplies and materials. Is there any way you can save 4-5 parking spaces directly in front of my business for these customers? I am concerned that potential customers will find another supplier if they have no place to park or have to walk a few blocks to pick up materials. There are 60 other businesses in the Midway Commercial Building that utilize on-street parking at University Avenue, Cromwell and Franklin Avenue.

Solutions:

- 1) Can you allow parking on University Avenue from 9:00 A.M until 3:00 P.M.? This would allow my customers to pick up materials between rush hours.
- 2) Cromwell currently has a 2 hour limit parking. Can you install metered parking for 15 minutes? This would allow customers to park off University Avenue and pick up materials from my business as well as others.
- 3) During construction can you limit parking around the Midway Commercial Building to 15 minutes which would allow all of our customers to have the opportunity to park near the building and pick up their materials?

Thank you for your consideration,

Art Miller, Business Owner  
Insty-Prints

---



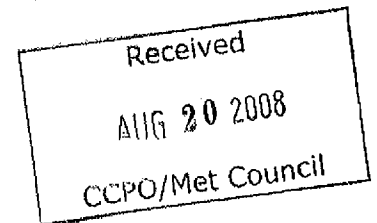
**JEWISH  
COMMUNITY  
ACTION**

2375  
UNIVERSITY  
AVENUE WEST  
SUITE 150  
SAINT PAUL  
MINNESOTA  
55114-1633  
PHONE (651)  
632-2184  
FAX (651)  
632-2188  
INTERNET WWW.  
JEWISH  
COMMUNITY  
ACTION.ORG

**Comments submitted on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor Light Rail Transit Project, located in Minneapolis and St. Paul, MN**

**From: Jewish Community Action  
2375 University Avenue  
Suite 150  
St. Paul, MN 55114  
Contact: Vic Rosenthal, Executive Director  
vic@jewishcommunityaction.org  
651-632-2184**

**August 19, 2008**



Jewish Community Action (JCA) is focusing our comments in support of the construction of the additional stations at Hamline Avenue, Western Avenue, and Victoria Street in St. Paul, Minnesota and other changes that are critical to equitable outcomes.

Jewish Community Action is a membership organization representing more than 700 households that brings together Jewish people from multiple communities to understand and take action on social and economic justice. For more than 12 years, JCA has been working in alliance with diverse organizations on issues of affordable housing, immigrant rights and community reinvestment.

Jewish Community Action has also been part of several coalitions of organizations for more than four years advocating for equitable outcomes and racial justice related to the development of light rail transit and other development on University Avenue. We have been supporting efforts to increase affordable housing, local hiring and living wage jobs in developments along the Central Corridor. We are a member of the Transportation Equity/Stops for Us Coalition which represents a total of 67 constituency-based and/or citizen participation organizations.

Our collective focus is to ensure that three additional stops are built at Hamline Ave., Western Ave. and Victoria Street by the completion of the line. These stops are part of a larger equity strategy for the future development along University Avenue.

**A case for equal access by building additional stations at Hamline Avenue, Western Avenue, and Victoria Street:**

The SDEIS claims “the analysis determined that no impacts associated with the proposed changes to the central corridor due to LRT would be disproportionately borne by minority or low-income communities” (Central Corridor LRT Project SDEIS pg 3-138) as a result of the omission of stations at Hamline, Victoria, and Western located in the Midway East Segment of the Central Corridor LRT.

Based on census statistics from 2000, one of our allies the Minnesota Center for Environmental Advocacy has found that the population at these stations is 80% minority versus the average minority population of all other stations is 39% (see attached spreadsheet Central Corridor LRT Minority Populations by Stations Sheet 1).

attached spreadsheet Central Corridor LRT Minority Populations by Stations Sheet 1). These communities are also at 70% of the median income of Ramsey County (see attached spreadsheet Central Corridor LRT Median Household Income by Stations Sheet 2).

As stated in the SDEIS, “22 percent of the households in the Study Area are without a car, thus, a substantial percentage of the population depends on transit to get to work, health care facilities, shopping destinations, schools, and recreational facilities” (Central Corridor LRT Project SDEIS, June 2008, pg 1-8).

The SDEIS also documents that the Midway East Segment of the Central Corridor Population has the highest population density of any other segment along the line (Central Corridor LRT Project SDEIS, June 2008, Table 1-2 pg 1-9 and Table 1-3 pg 1-11).

By these statistics, the minority, low income, transit dependent communities at Hamline, Victoria, and Western are being left out of the benefits of the Central Corridor LRT and does not meet the stated purpose and need to “provide better transit service and capacity to the diverse population of existing and future riders in the corridor” (Central Corridor LRT Project SDEIS, June 2008, pg 1-4).

The Environmental Justice website of the U.S. Department of Transportation “There are three fundamental environmental justice principles:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

(<http://www.fhwa.dot.gov/environment/ej2000.htm> retrieved 8/708),

Further, Kathryn O’Brian, Project Manager, Central Corridor Project Office received a letter on March 18, 2008 from Kenneth Westlake, Supervisor NEPA Implementation, U.S. Environmental Protection Agency Region 5, that stated “Three additional stations are being considered to serve the environmental justice neighborhoods a Hamline Avenue, Victoria Street and Western Avenue in St. Paul. A Central Corridor website...indicates these may be dropped from consideration due to cost factors. The SDEIS should provide a clear explanation of what factors...justify which stations are retained for detailed analysis or dropped from further consideration.” (Central Corridor website link Record of SDEIS Scope Comments received, pgs 56-57, retrieved 8/8/08). A clear explanation of these factors has yet to be articulated in the SDEIS.



## Community Involvement vs. Community Influence

The Metropolitan Council has provided many opportunities for community involvement throughout the planning process for the Central Corridor LRT. As stated in the Central Corridor LRT Project SDEIS June 2008 “The development of a public involvement program that incorporates the dynamic aspects of the affected neighborhoods and the greater metropolitan region was critical to achieving a successful project outcome” (pg 11-3). Although the Metropolitan Council has dedicated resources to community involvement, this involvement has lacked “full and fair” influence in the Central Corridor planning process.

As was commented by Anne White, Co-Chair at District Council Collaborative, Community Advisory Committee (CAC) member, and an active participant in the Transportation Equity/Stops for Us Coalition, in her testimony on the SDEIS, “However, there are several aspects of the current Public Engagement Process that we find lacking.” To illustrate this issue, she points out that the CAC has not been allowed to forward recommendations in the form of motions to the Central Corridor Management Committee, communication between CAC members has been discouraged, and an overall lack of responsiveness and transparency on the part of Metropolitan Council Central Corridor staff towards specific details and concerns. (Union Park District Council Testimony on the Supplemental Draft Environmental Impact Statement August 2008)

Yet it was through the strength of this community voice that the City of St. Paul unanimously passed a resolution on February 6<sup>th</sup>, 2008 affirming the importance of stops at “Western, Victoria, and Hamline Avenues” and calling on the Metropolitan Council “to take action” on the “following measures” “the deliberate pursuit of every opportunity in phase one to include stops at Hamline, Western, and Victoria Avenues along the proposed Central Corridor light rail line” (City of Saint Paul, Minnesota Resolution 08-108 <http://www.stpaul.gov/index.asp?nid=2128> retrieved 8/8/08).

Also on the strength of this voice, the community successfully influenced the Ramsey County Regional Rail Authority to pass a similar resolution stating “The construction of at least one of these stations is Ramsey County’s highest priority during this phase of building the line” (Unanimously passed by the Ramsey County Regional Rail Authority, 2/12/08).

“To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process”, as stated in the Environmental Justice website of the US Department of Transportation, there is articulated “properly implemented, environmental justice principles and procedures improve all levels of transportation decision making. This approach will:

- Make better transportation decisions that meet the needs of all people
- Design transportation facilities that fit more harmoniously into communities.
- Enhance the public-involvement process, strengthen community-based partnerships, and provide minority and low-income populations with

opportunities to learn about and improve the quality and usefulness of transportation in their lives.

- Improve data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts on minority and low-income populations.
- Partner with other public and private programs to leverage transportation-agency resources to achieve a common vision for communities.
- Avoid disproportionately high and adverse impacts on minority and low-income populations.
- Minimize and/ or mitigate unavoidable impacts by identifying concerns early in the planning phase and providing offsetting initiatives and enhancement measures to benefit affected communities and neighborhoods.”

(Environmental Justice website of the U.S. Department of Transportation  
<http://www.fhwa.dot.gov/environment/ej2000.htm> retrieved August 7, 2008)

In addition to the importance of adding the three stations, JCA also strongly supports two other critical needs to make sure this light rail corridor provides equitable outcomes. First, it is essential that the Metropolitan Council work closely with local businesses and property owners to develop a mitigation program to maximize parking on and near University Avenue. This mitigation program must provide support not only for the any loss of parking but also provide mitigation for other difficulties encountered during the construction of the LRT. Second, we recommend reinstatement of the Route 16 service in the non-peak hours to existing levels and insist that all bus service must be retained at levels that meet the needs of the most transit-dependent people who disproportionately live along the corridor.

**Bring the community involvement to completion by including the three stations at Hamline, Victoria, and Western to the Central Corridor LRT Line, maintaining bus service and providing mitigation to protect businesses and property owners in the community.**

The  
**Lower Phalen Creek Project**

925 Payne Avenue, Suite 201 • Saint Paul, Minnesota 55101 • [www.phalencreek.org](http://www.phalencreek.org)

**Steering  
Committee**  
Carol Carey, Chair  
Christine Baeumler  
Kristin Dawkins  
Karin DuPaul  
Chip Lindeke  
Weiming Lu  
Dan McGuinness  
Paul Mohrbacher  
Dennis Thompson

August 14, 2008

**Staff**  
Sarah Clark  
Amy Middleton

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104

Dear Ms. O'Brien:

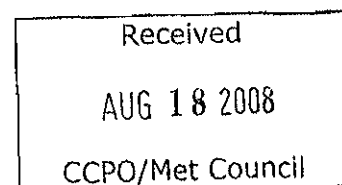
The Lower Phalen Creek Project is a community-led partnership that has worked for more than ten years to help establish the Bruce Vento Nature Sanctuary, create new trail and greenspace connections and improve local water quality. Our work on the sanctuary and the Bruce Vento Regional Trail connection into Lowertown has helped transform a portion of the "no man's land" between Saint Paul's East Side and Lowertown neighborhoods into a natural and recreational amenity that benefits local neighborhoods and attracts people from around the region.

We believe that the Central Corridor Light Rail Transit Project is rooted in a commitment to smart growth, connecting central cities and achieving sustainable communities. It is a project that provides an opportunity to attract substantial new investment in downtown and achieve the next renaissance for Saint Paul. Members of our Steering Committee have been actively involved in saving and restoring the Depot, relocating the Post Office, and bringing back the Amtrak. We are very supportive of the LRT project, and the development of the Depot as a multi-modal terminal.

However, the Lower Phalen Creek Project Steering Committee is very concerned about the proposed location of the new LRT maintenance facility under the Lafayette Bridge south of Kellogg Blvd. The proposed building and associated track takes up a significant area of land on either side of the Lafayette Bridge.

Placing the facility in the proposed location would fail to capture opportunities that are in keeping with our goal — and the city's goal — of achieving sustainable communities that benefit from proximity to the Mississippi River. It would lead to missed opportunities to:

- Make the riverfront attractive and accessible;
- Create new housing nearby that would further the success of Lowertown's urban village, expand its creative community and leverage the new amenities in the area, including the new LRT line and the Bruce Vento Nature Sanctuary; and
- Preserve the opportunity to restore an important open space link within the National Park Service's Mississippi National River and Recreation Area (MNRRA) corridor and Saint Paul's National Great River Park.

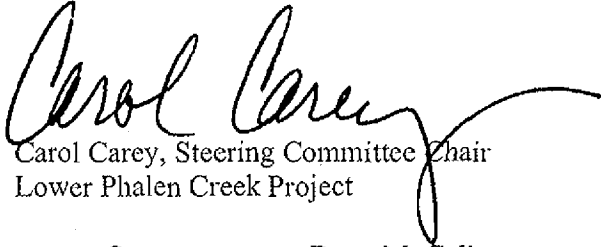


Further, the maintenance facility would have potential negative effects on the Bruce Vento Nature Sanctuary, specifically visual and noise pollution.

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

If you would like any additional information about our concerns please feel free to contact me (651.222.3049, [ccarey@historicsaintpaul.org](mailto:ccarey@historicsaintpaul.org)) or Sarah Clark of our staff (651.290.0002, [scarkmmc@comcast.net](mailto:scarkmmc@comcast.net)). Thank you for the opportunity to provide comments.

Sincerely,



Carol Carey, Steering Committee Chair  
Lower Phalen Creek Project

cc: Congresswoman Betty McCollum  
Saint Paul Mayor Chris Coleman  
Saint Paul City Council  
Ramsey County Regional Rail Authority  
Saint Paul Parks and Recreation  
Saint Paul Riverfront Corporation  
CapitolRiver Council  
Dayton's Bluff Community Council

**See Appendix 1 for comment attachments: Marcy-Holmes Neighborhood Association**

1. District Councils Collaborative engineering letter
2. District Councils Collaborative engineering Areas of concern

as an alternative to a University Avenue overpass without extra stop lights at both 4th Street and University Avenue at 8th Avenue S.E. which would further impede vehicular traffic flow.

We support extending River Road to Main Street but want to be assured that the bike and pedestrian way we negotiated with MNDOT under the new 35W bridge is not disturbed.

We vigorously oppose the proposed Granary Road going west beyond the 35W bridge. Our MHNA Master Plan shows 2nd Street S.E. as a residential street.

We are also very concerned that bus routes and bus service be maintained so that our neighborhood residents have access to mass transit. From the maps we have seen about diverting traffic when Washington Avenue is closed, we especially worry about Route #2 being changed. This is heavily used by our neighborhood and is our access to East and West Bank U campuses. We need the University bus route across 10th Avenue bridge to stop at University Avenue. If we are to access the Cedar/Riverside Central Corridor LRT stop this is especially needed or a Metro Transit bus across that bridge.

We also strongly support the Dinkytown Business Association in their concern that Metro Transit bus service or U bus service from the St. Paul campus to the East Bank campus be reinstated. Increased bus service should cut down on vehicular traffic.

We believe that the affect of up to 50% or more of additional traffic on the University Avenue S E and 4th Street S E corridor will have significant and longstanding negative impact on the environment in the neighborhoods surrounding the Central Corridor LRT, which have not adequately been considered in development the SDEIS. The Marcy Holmes Neighborhood Association in cooperation with the District Collaborative Council commissioned the attached engineering study, including: Engineering Cover Letter, and Areas of Concern.

We also assert that sufficient consideration and compliance with the following Federal regulations has not been accomplished:

Section 106 Of The National Historic Preservation Act Requires That The SDEIS Analyze The Adverse Effects Of The Washington Avenue At-Grade Alternative And Evaluate The Northern Alignment

MERA Prohibits State Actions That Will Materially Adversely Affect Minnesota's Natural Resources

We stand ready to collaborate with Hennepin County, the University, the Metro Council, the Minneapolis Park Board, the City of Minneapolis and any other institutions dealing with the problems outlined above.

Thanks,

Doug Carlson  
Marcy Holmes Neighborhood Board Member  
District Central Corridor Board Member  
Corridor Advisory Committee, representative

**LEONARD  
STREET  
AND  
DEINARD**

150 SOUTH FIFTH STREET SUITE 2300  
MINNEAPOLIS, MINNESOTA 55402  
612-335-1500 MAIN  
612-335-1657 FAX

August 25, 2008

**Carolyn V. Wolski**  
612-335-1641  
carolyn.wolski@leonard.com

**VIA HAND-DELIVERY**

Ms. Kathryn L. O'Brien  
Central Corridor Project Office  
Suite 200-S  
540 Fairview Avenue North  
St. Paul, MN 55104

Re: Comments on Supplemental Draft Environmental Impact Statement

Dear Ms. O'Brien:

I am writing on behalf of Minnesota Public Radio (MPR) to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) prepared for the Central Corridor Light Rail Transit Project (the Project).

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

Unfortunately, the SDEIS does little to analyze the issues of greatest concern to MPR — noise, vibration, EMI and RFI impacts, and even less to identify alternatives or mitigation measures. Instead, the SDEIS defers these matters to the Final Environmental Impact Statement (FEIS). Moreover, MPR is particularly concerned about a critical omission in the SDEIS noise analysis. As detailed in Comment 3 below, the SDEIS purports to rely on Federal Transit Administration (FTA) guidelines for its noise analysis, but then fails to use the objective land-use criteria set out in the guidelines. The omission raises serious questions about the efficacy of the SDEIS as to issues of vital concern to MPR.

MPR will continue to work with Project team members to fully understand how the Project could affect MPR's operations, and to develop reliable, long-term mitigation strategies that will address all potential impacts. In the meantime, MPR has the following comments on the SDEIS.

Ms. Kathryn L. O'Brien  
August 25, 2008  
Page 2

### General Comments

1. The purpose of the SDEIS was to study unresolved questions related principally to changed conditions. But the SDEIS falls short of resolving these issues. Time after time, the SDEIS fails to evaluate impacts, consider alternatives, or discuss mitigation measures. The SDEIS frequently refers to continuing study and ongoing discussion of issues, and concludes by stating that remaining issues will be documented in the FEIS.

2. Similarly, the SDEIS states that some of the "key issues," which are supposed to be the focus of the SDEIS, "remain uncertain" or "are currently being refined." (Page S-8.) This raises foundational concerns about the environmental-review process and, in turn, the conclusions derived from the process. As acknowledged in the SDEIS: "[F]ull consideration of environmental effects, as disclosed during the NEPA process, is required before the project can be advanced to the funding stage for final design, right-of-way acquisition, equipment and facilities, and system construction." (Page S-18.) This begs the question of how the SDEIS can analyze potential impacts arising from project elements that remain uncertain.

### Specific Comments

3. The SDEIS states that noise impacts were evaluated using the FTA General Noise Assessment procedures for Category 2 and Category 3 land uses. (Page 4-49.) In other words, no affected properties are being considered as Category 1 land uses, which are those most sensitive to noise. This conclusion is wrong, and more troubling is the fact that the conclusion appears to have been arrived at intentionally, through selective use of the FTA guidelines for assessing noise impacts.

At page 4-47, the SDEIS purports to present the FTA's table of Land Use Categories and Metrics for Transit Noise Impact Criteria. However, in the description of Category 1 land uses, the SDEIS has *excluded* the following sentence: "Also included are recording studios and concert halls." Attached to this comment letter are page 4-47 from the SDEIS (Exhibit A) and the table from page 3-5 of the FTA's Transit Noise and Vibration Impact Assessment, May, 2006 (Exhibit B).

Setting aside the disturbing implications of this omission, MPR's facility is obviously a Category 1 land use. It consists primarily of recording studios, including the Maud Moon Weyerhaeuser recording facility, which is directly adjacent to Cedar Street. Additionally, MPR's Fitzgerald Theater is a historic concert hall located less than one block away from the proposed Central Corridor route.

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



Ms. Kathryn L. O'Brien  
August 25, 2008  
Page 3

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

5. The SDEIS vibration analysis is generally better than its noise analysis, and there is an acknowledgment that where there is a potential for vibration impacts to occur, such as at MPR's facility, a detailed analysis should be undertaken to accurately define the impact and design mitigation measures. (Pages 4-59 and 4-64.)

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

6. The SDEIS concludes that three-car trains should not create additional vibration impacts because of the short amount of time it takes for a third car to pass by. (Page 4-46.) There is no analysis of vibration impacts from the entire train when its weight and length are increased by 50 percent.

7. As acknowledged in the SDEIS (Page 4-46), more information is needed about the vibration impacts of the 14 traction power substations, one of which, according to Figure 2-8 in the SDEIS, will be located right next to MPR's building.

8. While MPR appreciates that the SDEIS recognizes the potential for the Project to create EMI at MPR's facility, the SDEIS does not attempt to analyze that impact. Again, the SDEIS leaves analysis and mitigation to be addressed in the FEIS. (Pages 4-85 and 4-87). Ultimately, the potential impacts of both EMI and RFI need to be analyzed.

9. Finally, the general concerns expressed above also apply to the SDEIS's treatment of noise, vibration and EMI impacts — these parts of the SDEIS are short on analysis and defer the heavy lifting to the FEIS. For example:

- The analysis of noise impacts is “based on limited information because detailed noise modeling has not been completed.” (Page 4-44.)
- “At this stage of design, there is insufficient information available to define specific construction vibration impacts.” (Page 4-66.)
- Potential mitigation measures “will be important when evaluating potential vibration impacts to sensitive receptors and will be documented in the FEIS.” (Page 4-67.)

Ms. Kathryn L. O'Brien  
August 25, 2008  
Page 4

Thank you for your attention to these comments. While a considerable amount of analysis remains to be done on many issues, MPR will continue to work cooperatively with the Central Corridor Project Office to understand Project effects and to reach agreement regarding appropriate mitigation measures.

Very truly yours,

LEONARD, STREET AND DEINARD  
*Professional Association*



Carolyn V. Wolski

cc: Thomas J. Kigin, MPR  
Jeff Freeland Nelson, MPR

Table 4-13 Land Use Categories and Metrics for Transit Noise Impact Criteria

Land-Use Category	Noise Descriptor (dBA)	Description of Land-Use Category
1	Outdoor Leq(h) <sup>a</sup>	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 substantial outdoor use.
2	Outdoor Ldn	Residences and buildings where people normally sleep. This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.
3	Outdoor Leq(h) <sup>a</sup>	Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material. Buildings with interior spaces where quiet is important, such as medical offices, conference rooms, recording studios, and concert halls, fall into this category. Places for meditation or study associated with cemeteries, monuments, and museums, as well as certain historic sites, parks, and recreational facilities, are also included.

Source: FTA 2006

<sup>a</sup> Leq for the noisiest hour of transit-related activity during hours of noise sensitivity.

There are two levels of noise impact included in the FTA criteria. The level of impact affects whether noise mitigation is implemented.

- **Severe Impact** – Severe noise impacts are considered “significant” (as defined in NEPA). Noise mitigation is normally specified for areas with severe impacts unless there is no practical method of mitigating the impact.
- **Moderate Impact** – In this range, other project-specific factors are considered to determine the magnitude of the impact and the need for mitigation. Other factors can include the predicted increase over existing noise levels, the types and number of noise-sensitive land uses affected, existing outdoor-indoor sound insulation, and the cost-effectiveness of mitigating noise to more acceptable levels.

The FTA noise impact criteria are shown in Table 4-14. The first column shows the existing noise exposure and the remaining columns show the additional noise exposure from the Central Corridor LRT Project activity that would cause either a moderate or severe impact for a given land use category.

# EXHIBIT A

Dear Ms. O'Brien,

I hereby provide the following comment on from the Marcy Holmes Neighborhood in Minneapolis, regarding the Central Corridor LRT:

WRITTEN COMMENTS OF ARVONNE FRASER, PRESIDENT, MARCY-HOLMES NEIGHBORHOOD ASSOCIATION, MINNEAPOLIS CONCERNING CENTRAL CORRIDOR LRT AND CLOSING OF WASHINGTON AVENUE S. E. TO TRAFFIC.

TO: Kathryn O'Brien [Kathryn.obrien@metc.state.mn.us](mailto:Kathryn.obrien@metc.state.mn.us), and U.S. FTA

RE: Federal Register Cite (Vol. 73, No. 37, Monday, February 28, 2008): 73 F Reg 10090; Title: Department of Transportation, Federal Transit Administration; Supplemental Draft Environmental Impact Statement for the Central Corridor Light Rail Transit Project, Located in Minneapolis and Saint Paul, MN; Agency: Federal Transit Administration (FTA), Department of Transportation (DOT); Action: Notice of Intent to prepare a Supplemental Draft Environmental Impact Statement (SDEIS) (see attached PDF document).

Thank you for this opportunity to make public comments about the Central Corridor :LRT SDEIS

Our neighborhood abuts the University on the east, has the Mississippi River as our southern border, Central Avenue at the west, and the railroad tracks just south of E. Hennepin as our northern border. We are the neighborhood that will be most affected by traffic diverted off Washington Avenue by the Central Corridor LRT. 35W bisects our neighborhood. We are where the bridge fell down and are already experiencing what happens when a major thoroughfare is closed. Two county roads in our neighborhood-University Avenue and 4th Street SE-- are overwhelmed with traffic as is the 10th Avenue bridge which connects us directly to the University's West Bank campus and the proposed Cedar/Riverside LRT stop. E. Hennepin to our north is also far more heavily traveled with the bridge down.

Many of us walk or bike to the East and West bank campuses; we walk or bike across the Stone Arch Bridge to downtown and we want to enjoy our Mississippi River front. When the 35W bridge reopens this fall we will have increased traffic and increased air pollution because much of the traffic after the bridge closed circumvented our neighborhood. Thus, with the reopening of the bridge traffic will increase. If Washington Avenue bridge is closed that will simply mean more traffic and more pollution for our neighborhood.

Little if any funding for traffic mitigation is available for the significant diversion of traffic to the University Avenue S E and 4th Street S E corridor, as a result of the closing of Washington Avenue S. E., from the Central Corridor project or any other responsible City, County entity or the State of Minnesota.

We want it understood that traffic is not just vehicles-or if it is-then pedestrians and bikers need to be protected from vehicular traffic. We desperately need a pedestrian and bike overpass on University Avenue where it intersects with the 35W exit and entrance ramps. We understand 4th Street SE and University SE are county roads and are very concerned about the increased traffic that all engineering studies show continue to carry increased traffic where they intersect with 35W. This poses great danger for pedestrians and bikers. Already the 5th Street overpass over 35W serving both bikers and pedestrians is crowded at many times during the day. Getting to and from that overpass is not feasible

<b>Land Use Category</b>	<b>Noise Metric (dBA)</b>	<b>Description of Land Use Category</b>
1	Outdoor $L_{eq}(h)$ *	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. Also included are recording studios and concert halls.
2	Outdoor $L_{dn}$	Residences and buildings where people normally sleep. This category includes homes, hospitals and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.
3	Outdoor $L_{eq}(h)$ *	Institutional land uses with primarily daytime and evening use. This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation and concentration on reading material. Places for meditation or study associated with cemeteries, monuments, museums, campgrounds and recreational facilities can also be considered to be in this category. Certain historical sites and parks are also included.
* $L_{eq}$ for the noisiest hour of transit-related activity during hours of noise sensitivity.		

### **3.1.2 Defining the Levels of Impact**

The noise impact criteria are defined by two curves which allow increasing project noise levels as existing noise increases up to a point, beyond which impact is determined based on project noise alone. Below the lower curve in Figure 3-1, a proposed project is considered to have no noise impact since, on the average, the introduction of the project will result in an insignificant increase in the number of people highly annoyed by the new noise. The curve defining the onset of noise impact stops increasing at 65 dB for Category 1 and 2 land use, a standard limit for an acceptable living environment defined by a number of Federal agencies. Project noise above the upper curve is considered to cause Severe Impact since a significant percentage of people would be highly annoyed by the new noise. This curve flattens out at 75 dB for Category 1 and 2 land use, a level associated with an unacceptable living environment. As indicated by the right-hand scale on Figure 3-1, the project noise criteria are 5 decibels higher for Category 3 land uses since these types of land use are considered to be slightly less sensitive to noise than the types of land use in categories 1 and 2.

Between the two curves the proposed project is judged to have Moderate Impact. The change in the cumulative noise level is noticeable to most people, but may not be sufficient to cause strong, adverse reactions from the community. In this transitional area, other project-specific factors must be considered to determine the magnitude of the impact and the need for mitigation, such as the existing level, predicted level of increase over existing noise levels and the types and numbers of noise-sensitive land uses affected.

Although the curves in Figure 3-1 are defined in terms of the project noise exposure and the existing noise exposure, it is important to emphasize that it is the increase in the cumulative noise – when project is added to existing – that is the basis for the criteria. The complex shapes of the curves are based on the considerations



## Preservation Alliance of Minnesota

*"... to preserve, protect and promote Minnesota's historic resources"*

August 25, 2008

Kathryn O'Brien  
Environmental Services Project Manager  
Central Corridor Project Office  
540 Fairview Avenue  
St. Paul, MN 55104

Re: Central Corridor Light Rail Transit, Section 106 Review and Comments  
Final Supplemental Historic Properties Investigations and Evaluations Report  
and Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Ms. O'Brien:

Thank you for allowing the Preservation Alliance of Minnesota to consult on the Final Supplemental Historic Properties Investigations and Evaluations Report and the SDEIS for the Central Corridor Light Rail Transit project. I have reviewed the proposed stipulations on behalf of the Alliance. In general, I agree with the findings of the Final Supplemental Historic Properties Investigations and Evaluations Report, but I believe that the following information has not been provided in the SDEIS.

- 1) In Chapter 7, the Section 4(F) Evaluation concludes that the LRT project might result in permanent use of the Saint Paul Union Depot and that constructive use is unlikely. Figure 7-2 illustrates the configuration of the Union Depot station platform, but that plan differs drastically from the illustrations provided at our on-site meeting on August 18, 2008. (Ramsey County Regional Railroad Authority and URS, "Pedestrian Circulation Union Depot Transit Station," Comparison of Alignment Alternatives," and "Minnesota's Union Depot Multi-Modal Transit Hub," all dated August 11, 2008, and DMJM Harris, AECOM, and Kimley-Horn and Associates, "The Central Corridor LRT Union Depot Exhibit," dated July 22, 2008.) Given the obvious development of these later plans, I believe the SDEIS statement is misleading and that its conclusion—that the anticipated effects will not be adverse—is inaccurate.
- 2) Although the proposed route of the LRT will cut diagonally across the block occupied by the Saint Paul Athletic Club, there appears to be no record of vibration studies having been performed on the building, which is significant in part because of its elaborate ornamental plaster and terra cotta interior. The

vibration chapter tacitly acknowledged that a fragile historic resource could be impacted by the LRT (Broadway Alternative, Lowertown Commons section, page 4-65), but the condition of the ornamental interior of the Saint Paul Athletic Club has not been evaluated. The historic churches on Cedar Street (Church of Saint Louis King of France and Central Presbyterian Church) are also located very close to the proposed LRT tracks and their ornamental and structural characteristics also might be harmed by the vibration of the trains. In short, I am unwilling to accept the SDEIS statement that “it is extremely rare for vibration from train operations to cause building damage” (page 4-64) without further study and documentation.

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

I also ask that vibration studies and structural analysis be performed on the Saint Paul Athletic Club Building, Church of Saint Louis King of France, and Central Presbyterian Church. At the very least, these studies should be performed as mitigation of the potential effects. If the vibrations will have the potential to cause damage, the routes should be moved or treatment guidelines should be put in place.

Given the length and extent of the SDEIS, I have probably overlooked some item of concern, so I look forward to further conversations with you during the Section 106 mitigation process. Thank you for taking my comments into consideration.

Sincerely,

Erin Hanafin Berg  
Field Representative

cc: Dennis Gimmestad, SHPO  
Jackie Sluss, MnDOT

ST. PAUL **Smart Trips**55 E 5TH ST. SUITE 202  
ST. PAUL, MN 55101

August 20, 2008

Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North  
St. Paul, MN 55104

Dear Ms. O'Brien,

I'm writing on behalf of St. Paul Smart Trips to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Central Corridor LRT Project. St. Paul Smart Trips is a non-profit organization that works to reduce vehicle miles and improve air quality in the City of St. Paul by promoting alternatives to driving alone and advocating for a balanced transportation network. Our 15-member board of directors represents local government, businesses, and residents.

We strongly support the CCLRT because it represents the most critical piece in the development of a balanced regional transportation system. The CCLRT will link downtown St Paul, the Capitol, the Midway, the University of Minnesota, and downtown Minneapolis providing connections to jobs, education, services, and entertainment for St Paul residents and those who visit, work, go to school, or do business in our city.

Although we support the project, we feel the project could be enhanced in the following ways:

#### Additional Stations

To ensure that the project equitably serves all neighborhoods along the corridor, we support adding stations at Western, Victoria, and Hamline. The proposed station spacing of one mile coupled with a reduction in service of route 16 could adversely impact low-income communities along the corridor that depend on public transit. In December of 2007, the District Councils Collaborative of Saint Paul and Minneapolis found that adding these stations would:

1. Be more consistent with station-spacing practices in other municipalities
2. Be more consistent with the corridor's character as a local corridor as opposed to a commuter corridor
3. Tap high ridership potential in the corridor given socio-economic and geographic characteristics
4. Provide transportation service equity
5. Create more opportunities for future economic development
6. Strengthen the goals and objectives of the Central Corridor LRT Project.<sup>1</sup>

#### Public Realm

As an organization whose mission is to reduce driving miles and improve air quality, we recognize the importance of a high quality public realm that supports more biking, walking, and transit use. A linchpin for creating a high quality public realm is the provision of wide sidewalks. **We feel that at a minimum, the sidewalks on University Avenue should be 14' wide.** A 14' sidewalk would allow for:

- 2' door zone so that opening and closing doors do not obstruct pedestrian traffic
- 6-8' walk zone (6' minimum needed for passing strollers or passing wheelchairs)
- 4-6' furniture zone for street trees, garbage receptacles, benches, lighting, bike racks, and snow pile in winter months

<sup>1</sup> District Councils Collaborative of St. Paul and Minneapolis. "Central Corridor LRT Stations at Western, Victoria, and Hamline Avenues: Preliminary Community Report" (December 2007).



Another critical aspect of a high quality public realm is to buffer the sidewalk from vehicle traffic. Buffering can be accomplished through various means such as on-street parking, planted boulevards, and bike lanes. Given the restricted right-of-way on University Avenue, we think on-street parking may be the best strategy because it can serve multiple purposes. In addition to acting as a buffer, it provides quick and convenient parking for local businesses, many of whom have no off-street parking. The provision of on-street parking can also help deter spillover parking into neighborhood streets. Finally, on-street parking can serve as a revenue stream for the City or the local business district. **Because of the important purposes that on-street parking can serve, we oppose the loss of over 80% of this valuable resource as proposed under the current plans.**

Within the constricted right-of-way, wider sidewalks and the preservation of on-street parking would necessitate reapportioning some of the space given to automobiles by narrowing or reducing the number of travel lanes. While Met Council traffic engineers report that eliminating one traffic lane in each direction would result in failing levels of service (LOS) for motorized vehicles at key intersections, we question the accuracy of the assumptions used in their calculations. LOS is a standard developed to measure the free flow of automobiles. By using this standard, we are making long-term decisions about the future of this corridor based largely on the convenience of automobiles. We recommend a more objective study that evaluates the quality of service for all modes when measuring an intersection's performance. A more objective assessment could find that trading a traffic lane for wider sidewalks and on-street parking would result in greater overall benefits to the community by reducing automobile traffic and encouraging biking, walking, and transit trips.

At the very least, one strategy for saving the on-street parking under a 4-lane configuration is to use the curb or outside lane for on-street parking and bikes except during the afternoon peak hours.

Finally, strong bike and ped connections to station platforms and across University Avenue will also improve the public realm. The project engineers have been working to maximize access to stations by accommodating riders at both ends of the platforms. Additionally, they have added ped crossings near key destinations along the corridor. We support these efforts and oppose the elimination of these non-signalized pedestrian crossings as a strategy for reintroducing on-street parking.

#### Vehicle Maintenance Facility

We share the concern of the Capitol River Council that the location of the vehicle maintenance facility in Lowertown could block access between Lowertown and the river. The proposed location of the facility could impede the ability to connect existing and new streets to the river to facilitate bike and ped connections between amenities such as the farmer's market and trails along the river at more moderate grades than the existing connections at Jackson and Sibley.

Thank you for your consideration,

Jessica Treat  
Executive Director

July 16, 2008

Ms. Kathryn O'Brien  
Central Corridor Project Office  
540 Fairview Avenue North, Suite 200  
St. Paul, MN 55104



Stuart Companies

**RE: SDEIS Public Hearings**

Dear Ms. O'Brien:

Please accept this letter as my comments for the record on the above-referenced subject.

I represent the owners for 360 Cedar Street, LLC that owns property on the southeast corner of 5<sup>th</sup> and Cedar Streets in downtown St. Paul. The planned alignment of the Central Corridor LRT calls for a light rail track and station to be located on that block and would require the acquisition and demolition of our building.


I submit that this change in the diagonal alignment through this block and its impact are not adequately addressed in the SDEIS. I submit that the City of St. Paul is either unwilling or unable to act as the taking authority which undermines the conclusion in the SDEIS that the construction of LRT stations will promote redevelopment.

More specifically, this diagonal realignment would have a negative economic impact on downtown St. Paul. Downtown St. Paul is already short of parking spaces and a large number would be lost with this proposed realignment. More importantly, we have had discussions with Ecolab during the past year for their making a long-term commitment to use our entire building as their training and conference center. If our building is taken, there is not another building in the city of St. Paul with close proximity to Ecolab headquarters that could accommodate their needs and this facility would likely be moved to Ecolab's campus in Mendota Heights.

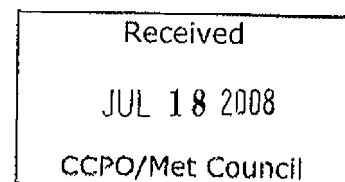
We would strongly prefer that the realignment of the LRT be changed so as to not take our building or parking lot.

Sincerely,

**Stuart Companies**

  
Stuart H. Nolan  
Founder and Chairman

SHN:mt  
Writer's Direct Dial:  
(952) 948-9501



Corporate Headquarters  
1050 West 80th Street

Minneapolis, MN 55420-1000

☎ 952.948.9500

f 952.948.9570

Regional Office

632 Western Avenue

Cedarburg, WI 53012

☎ 262.376.9771

f 262.376.9772

<http://www.stuartco.com>

cc: David Oslund

*Transit for Livable Communities*

*626 Selby Avenue*

*St. Paul, MN 55104*

August 25, 2008

Kathryn L. O'Brien, AICP, Project Manager  
Central Corridor Project Office  
540 Fairview Ave. North, Suite 200S  
St. Paul, MN 55104

Dear Ms. O'Brien:

Transit for Livable Communities (TLC) is writing to offer comments on the Supplemental Draft Environmental Impact Statement for the Central Corridor Light Rail Transit line. Transit for Livable Communities is a non-profit organization that advocates for expanded public transit and improved conditions for bicycling and walking. We have a network of nearly 9,000 Twin Cities' residents who support this mission. We strongly support light rail in the Central Corridor and we are eager for this project and other rail and bus projects to move forward.

Light rail in the Central Corridor has many benefits. It will provide a more reliable transit trip, reduce a percentage of the emissions currently produced by diesel buses and motor vehicles, provide easier boarding for the mobility impaired, people with young children, and bicycle riders, and help to improve the pedestrian environment. In addition, LRT offers the opportunity to replace some of the vacant parcels, off street parking lots, and underutilized sites in the corridor with higher density development and new jobs – the recent trend has been job loss in the developed area of the Twin Cities' region and job growth in the developing communities at the edge of the region. LRT can help to reduce this troubling trend.

This letter highlights our organization's positions on several of the nine major project elements analyzed in the Supplemental Draft Environmental Impact Statement and several other topics mentioned briefly in the document.

- TLC supports a **street level alignment for light rail on Washington Avenue** through the University of Minnesota campus. We believe that a **transit mall** with bus and train service on Washington Avenue will improve accessibility for pedestrians and transit

users, improve safety, and make the campus a national model in sustainable transportation. A transit mall has the potential to improve the small business environment on Washington Avenue by increasing the people-moving capacity of the corridor.

- TLC supports the inclusion of **LRT station at Western, Victoria, and Hamline** with agreement from the city and communities to increase development density at these and other station locations. Additional stations should be in place on opening day or shortly thereafter. Additional stations will improve accessibility for neighborhood residents and provide greater opportunity for transit oriented development. **Service on the #16 bus** should be maintained at a high frequency level. **North/south bus service** connecting with the corridor should be greatly expanded.
  - TLC supports routing of light rail to Union Depot along 4<sup>th</sup> Street in downtown St. Paul continuing east to the proposed new maintenance facility. We support the **consolidation of two stations** into one station at 4<sup>th</sup> and Cedar. To reduce costs and right angle turning movements TLC also support a **more direct alignment in downtown St. Paul** by eliminating the routing east to Jackson Street. The Union Depot should become a multi-modal station for the east metro that connects local buses, light rail, statewide bus service, Amtrak, and future high-speed rail to Chicago.
  - TLC supports design and construction of platforms, a power system and **maintenance facility in St. Paul** to accommodate the future use of **three cars trains**. We believe that this is a prudent strategy for what will be a key connecting line to a much larger LRT system and regional rail system in the future.
  - The DEIS discusses motor vehicle parking in several sections. TLC supports metered on - street parking along the corridor and implementation of a Parking Benefit District. Angle parking should be considered on adjacent streets. City ordinances should emphasize maximum number of parking spaces allowed rather than minimums. Allowing additional on-street parking in off-peak times should be considered in lower traffic sections of University Avenue.
  - **Bicycle access** should be enhanced in the LRT corridor - improved parallel and perpendicular bicycle access should be a priority. Bicycle parking should be added along the corridor. The City has received a federal grant through Bike/Walk Twin Cities, a program administered by Transit for Livable Communities, to evaluate ways to improve bicycle and pedestrian access. The SDEIS should reference the bicycle and pedestrian mode shares for St. Paul and Minneapolis specifically which are much higher than the mode shares for the region as a whole.
  - TLC supports planning to keep the project cost at an amount that will enable it to meet federal thresholds for **cost-effectiveness** and compete successfully with other proposed projects from around the US.
-

If you have any questions please contact TLC at 651-767-0298.

Sincerely,

Barb Thoman  
Program Consultant

**Union Park District Council  
Testimony on the Supplemental Draft Environmental Impact Statement  
August 2008**

Thank you very much for the opportunity to comment on the SDEIS. We appreciate all the time and effort that has been invested to bring the project to this point.

In commenting on the Draft Environmental Impact Statement for the Central Corridor in June 2006, the Merriam Park Community Council expressed support for building a light rail line along University Avenue and identified a number of priority issues we felt needed additional study and consideration, including the need to:

- Build an LRT line that serves the people who live and work along University Avenue, especially those who depend on transit as their only available means of transportation;
- Provide a complete network of bus service, with the current frequency of the #16 bus maintained to accommodate transit riders getting on or off between LRT stations, especially if the stations are more than ½-mile apart;
- Ensure a high level of safety for cars, bicycles and pedestrians, especially for seniors, handicapped, school children, mothers with strollers, and Midway area shoppers; and
- Involve the community in decision-making about LRT throughout planning, design and construction.

**Correction needed in List of Recipients:** In July 2007, the Merriam Park, Snelling Hamline and Lexington-Hamline district councils united to form the Union Park District Council (UPDC). But the List of Recipients for the SDEIS still includes the three extinct district councils and UPDC is omitted. We would ask that this error be corrected in the Final Environmental Impact Statement to ensure that UPDC receives all official materials related to the Central Corridor LRT in the future. **UPDC should be added to the List of Recipients for the FEIS and the Merriam Park, Snelling Hamline, and Lexington-Hamline district councils should be removed.**

UPDC remains committed to the Central Corridor LRT, but we find that a number of issues we identified in our comments on the proposed scope of the SDEIS have not been adequately addressed in the SDEIS. We would urge that the FEIS include more rigorous consideration of the following issues:

**1. The need to place the highest priority on pedestrian, bicyclist and traffic safety.**

The UPDC is pleased that safety has been given a high priority in LRT plans to date. However, we do not believe that the SDEIS has adequately addressed the critical issue of pedestrian safety. **We would like to ensure the FEIS fully addresses the need to require LRT plans to result in improved safety, especially for people with limited mobility and at locations with high accident rates, such as the stretch of Snelling from I-94 to University Avenue.**

Plans for LRT should include defined safety goals agreed upon by the community. In areas of less traffic, retaining current levels of safety might be the goal. In more dangerous areas, the goal must be to achieve improved safety and a reduced number of accidents.

Basically, UPDC believes the main problem is car and truck traffic, especially when going too fast, disregarding traffic signals or not stopping for pedestrians and bicyclists in crosswalks. **To**

**improve pedestrian safety along the Central Corridor, we recommend the following actions, to be coordinated with the cities and counties as appropriate:**

- A. Enforce pedestrian, bicycle and car traffic laws;**
- B. Enforce speed limits and traffic signals – including the use of photo enforcement;**
- C. Install prominent signage to mark pedestrian crossings and to let cars know they must stop for pedestrians and bicyclists in the right-of-way;**
- D. Add design elements to discourage jaywalking and inappropriate behavior by pedestrians and bicyclists;**
- E. Explore the possibility of reducing traffic lanes to one in each direction to provide on-street parking as a buffer between pedestrians and traffic; and**
- F. Install street lights, surveillance cameras and other devices to increase public safety.**

For the Midway area that abuts our neighborhood, we are especially concerned about providing safe crossings for pedestrians in and around the shopping area and in the vicinity of senior residences such as Episcopal Homes at Fairview Avenue. Over 150 traffic accidents and two pedestrian deaths have occurred near the proposed Snelling/University LRT station during the last year, a number that is unacceptable to the community.

In addressing safety issues for the Snelling-University intersection, UPDC believes the solution must focus on providing safe, efficient, and pleasant crossings for pedestrians, bicyclists, cars, buses, and LRT. The goal should be to calm traffic, not just to move traffic more rapidly through the intersection with a tunnel or widening of Snelling.

In the SDEIS, especially in the Transportation chapter, the focus remains almost exclusively on improving the movement of vehicles, with a heavy emphasis on technical data related to traffic counts and the effect on the Level of Service of the Snelling-University intersection.

**UPDC believes that the FEIS must include additional studies of the Snelling-University intersection that are not oriented to solving the needs of vehicles, but rather balance movement needs of people with how traffic operations should be modified to make Snelling and University a safe and successful location for LRT, designed to encourage transit-oriented development.**

**Additionally, the intersection itself should not be the sole focus of problem-solving for traffic. Alternative solutions should be sought over a broader geographic area, such as adding or completing additional north-south road and bus connections to Roseville and Highland Park or improving other east-west routes to accommodate through traffic.**

**It is also critical that UPDC and other neighborhood representatives be included from the beginning and throughout the process in addressing problems at the Snelling-University intersection and the adjacent I-94 ramps.** *The Snelling Green Streets Study* by Saint Paul's Central Corridor Design Center provides a good example of this inclusive approach. (See Appendix A -- *Snelling Green Streets Summary Report, May 2008*) In contrast, the 2006 *Snelling/University Capacity Study*, prepared by SRF Consulting Group, was undertaken with no input from the adjacent neighborhoods; as a result, the study and the proposed solutions were rejected by the community.

**On University Avenue, especially in the Midway area, UPDC recommends that non-signalized pedestrian crossings be provided at every intersection that does not have a traffic light.** If pedestrian crossings are not provided at frequent intervals, people will be far more likely to cross midblock rather than walking a block or more to a crossing. This puts pedestrians at great risk as they attempt to cross traffic and rail lines with no central islands or protected crosswalks. For people in wheelchairs, mothers or fathers with young children, or school groups, walking some distance to safely cross the street or to gain access to a station platform would be a severe hardship.

**In the Snelling/University station area, an additional non-signalized pedestrian crossing is needed at Asbury Street for pedestrians crossing University Avenue to get to the Midway shopping center.** This would also provide direct access to the eastbound station platform for passengers coming from the Transit Plaza or from the residential neighborhood to the north. Engineering drawings show that this would not interfere with the need for a long left turn lane and it would go a long way toward discouraging dangerous jaywalking at this busy intersection.

There are a number of locations where long sidewalks are proposed in the middle of the avenue to gain access to the LRT station platform. We do not believe this is safe or pedestrian-friendly for anyone – certainly not for seniors or people in wheelchairs. **UPDC thinks it is critical to reexamine the plans for mid-street sidewalks, where pedestrians are forced to walk on a 10-foot wide walkway between passing light rail trains and auto traffic. Consideration should be given to providing direct crossings at both ends of each station platform. The goal should be to ensure safe and comfortable access to station platforms for everyone, including people in wheelchairs and mothers or fathers with children in strollers.**

**2. The need to ensure full façade-to-façade reconstruction and beautification to create an enhanced economic environment for businesses with stations and public art that that evoke the special qualities of each individual neighborhood along the corridor.**

UPDC believes it is essential that University Avenue's streetscaping needs be addressed as part of LRT planning. The project scope includes resurfacing the street and rebuilding curbs, gutters and sidewalks along University Avenue (with a portion of the expenses to be paid by Ramsey County and the City of Saint Paul). Equally important is the evaluation of each neighborhood's existing streets and sidewalks, and planning for appropriate reconstruction and beautification. Additional streetscaping elements, such as trees, pedestrian-scale lighting, benches, and boulevards, are essential to turn University Avenue into a lively, pedestrian-friendly thoroughfare. It may not be possible to fund these amenities within the project budget, but we hope every effort will be made to ensure that streetscape improvements are made at the time the LRT is built, to avoid more disruption, and increased costs for streetscaping at a later date.

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

Unfortunately, there has been little coordination to date; three separate groups have been working on station design, streetscaping, and selecting public artists. Planning for stations is moving forward without sufficient input from public artists or community members, and the



public art process, as currently envisioned, severely limits the role of neighborhoods in helping to create a concept and selecting artists for each station.

Early on, the station design and public art process was put forward as one area where the public would have an opportunity to “influence” the outcome. But now the stations are being designed and the public artists selected with no neighborhood involvement. It’s already very late in the process, but **we urge that local neighborhood committees be set up as soon as possible to help develop a distinctive concept for each station.**

**3. The need for mitigation to help businesses along University Avenue survive and thrive during construction and after the LRT opens in 2014.** Safe streets, comfortable walking, and easy access to transit are essential elements of a safe and inviting environment that encourages shopping, dining, meeting friends for coffee, or strolling and window-shopping. In some locations, mitigation may also be required to enable current residents and small businesses to survive through construction and remain on University Avenue in the future. The LRT project should bear some of the costs of mitigation, if required, since the loss of on-street parking is the direct result of the project.

The community is committed to retaining the rich diversity of our neighborhoods. For the many small businesses along University Avenue, mitigation will be required to enable them to survive construction and to remain in place as property values, rents and taxes rise with the coming of LRT. The impacts on small businesses during construction are likely to be the most severe, since most of them operate with a very small profit margin. Although this may not be the responsibility of the LRT project, it is critical that there be continued cooperation between the project and the cities to ensure the survival of our diverse small businesses.

- The LRT project should develop a mitigation plan for businesses all along University Avenue to help offset disruptions during construction; this might include business consulting services, micro loans and marketing campaigns developed in cooperation with the cities.
- For businesses that lose on-street parking due to the LRT, mitigation should be provided, ideally in the form of off-street replacement parking or shared parking. The project should bear some of the costs of parking mitigation, such as building a parking ramp if needed, given that the loss of on-street parking is a direct result of the LRT project. The cities should also help resolve parking issues to ensure that small businesses can continue to survive and thrive on University Avenue.
- One possible solution to the parking problem that has been suggested is to reduce the number of driving lanes on University Avenue to one in each direction instead of two in each direction as currently planned. Traffic studies to date indicate that this would cause 13 intersections to fail at the afternoon rush hour, but may be workable at other times of day. **UPDC believes that additional studies should be done to determine the viability of time specific parking, allowing for on-street parking for most of the day and evening by going to one lane of traffic in each direction, then reverting to two lanes in each direction, with parking prohibited, during peak afternoon hours.**
- The elimination of most of the on-street parking on University Avenue also raises safety issues for pedestrians on the sidewalks, where they will be walking right next to moving traffic, with no protective barriers currently envisioned. Although this may not actually endanger pedestrians, it is likely to make people feel unsafe, which would then discourage walking along the avenue. Both pedestrians and parking are critical for the survival of

businesses, so it's important to create an environment that welcomes both walkers and drivers.

- The Met Council should work with Ramsey County and the City of St Paul to evaluate parking needs, coordinate efforts to replace lost parking, and put in place measures to resolve parking issues so that existing businesses and residents can remain on or near University Avenue.
- Other questions that should be addressed by the CCPO if most on-street parking is eliminated: How can people avoid getting splashed by passing cars in rainy weather? Where will the snow be piled? Where will delivery trucks stop to drop or pick up a package – in the right-hand driving lane?

**UPDC believes that the LRT project must find ways to restore a substantial number of on-street parking spaces to ensure the survival of the many small businesses on University Avenue. Mitigation should be provided in the form of shared parking, consolidated parking, metered side street parking, or structured parking, if needed. Since the loss of parking spaces is a direct result of the LRT, some mitigation funding should be included in the project budget for parking replacement.**

#### **4. The need for additional stations at Hamline Avenue, Victoria Street and Western Avenue and continued #16 bus service at 8-12 minute frequencies.**

In a letter to Metropolitan Council Chair Peter Bell in January 2008 (Appendix B), we stressed the importance of including stops at Western, Victoria and Hamline and continuing the current 8-12 minute schedule of service for the #16 local bus on University Avenue. As we noted in our letter, if these additional stations are not included in the project and #16 bus service is cut back to 20-30 minute frequencies, *“...many residents along University Avenue will be faced with reduced transit access once the light rail is built.”*

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

*“Environmental justice is defined as the equitable treatment and meaningful involvement of all persons regardless of race, color, national origin, or income. The purpose of considering environmental justice is to ensure that sensitive populations do not bear a disproportionate share of the negative impacts associated with the development of the Central Corridor LRT, and that benefits of the project are distributed fairly to all users, regardless of race, ethnicity, or socioeconomic status.*

*In determining compliance with the intent of Executive Order 12898, this analysis examines whether the proposed changes to the AA/DEIS LPA provides transit service equity, whether minority or low-income populations are disproportionately exposed to the adverse effects associated with the project's development, and whether these communities have had the opportunity to participate in activities related to planning the project.*

*The analysis determined that no impacts associated with the proposed changes to the LPA would be disproportionately borne by minority or low-income communities.*

*There will be a variety of short-term construction impacts, as well as long term impacts such as loss of on-street parking and changes to property access that would be experienced by all residents and users of the corridor. However, these impacts are not disproportionately borne by sensitive communities; rather they are borne by all communities along the corridor. Benefits of the project, including increased mobility along the Central Corridor, would be experienced by all populations.*

*Because the expected adverse impacts would not be disproportionate, no special mitigation measures beyond those proposed in the AA/DEIS would be necessary.”*

**UPDC emphatically disagrees with the SDEIS claims that:**

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

**We believe it is essential that the FEIS re-examine these claims and respond to analysis by the District Councils Collaborative (See Appendix C -- DCC research report, *Additional Stations: Making the Case for Western, Victoria and Hamline, November 2007*) and the Transportation Equity/Stops4Us Coalition (See Appendix D – *Map of ½-mile station spacing pattern in residential areas -- Spreadsheet of minority and low-income population percentages at three missing station areas as compared to currently planned station areas*). **These studies and charts clearly indicate that the predominantly minority and low-income populations around Western, Victoria and Hamline will suffer disproportionate negative impacts if the project does not include the building of stations at these locations. These environmental justice issues are not adequately addressed in the SDEIS.****

Transportation inequities that are not adequately addressed in the SDEIS include:

- Stations a mile apart and reduced bus frequencies will result in reduced mobility and negative time saving benefits due to longer walks and/or longer waits to access transit for people who live within a ¼-mile of the three missing stations. The large percentage of low-income, ethnically diverse, and transit-dependent populations in this area are exactly the people the environmental justice laws are designed to protect from disproportionately high negative impacts. Yet these issues are not addressed in the SDEIS, and no mitigation is proposed.
- There is a clear pattern of stops every half mile established along University Avenue in residential areas, but this pattern is broken in the area between Snelling and Rice, where stations are a mile apart. (See attached map – Appendix D) There is also a dramatic difference in the percentage of minority and low-income populations living within a quarter mile of the missing stations, as compared to the quarter-mile areas around currently planned stations from the West Bank to Rice Street. Recent analysis by the Transportation Equity/Stops4Us Coalition indicates that **the percentage of the population below the poverty level in the ¼-mile areas around Western, Victoria and Hamline is 77%,**

**compared to 45% in the ¼-mile areas around the currently planned stations from the West Bank to Rice. Similarly, the percentage of minorities living in the missing station areas is 80%, while the minority population around planned stations from the West Bank to downtown St. Paul is 39%. The omission of the three stations and reduction in #16 bus service presents a clear pattern of discrimination, results in reduced levels of transit service, and imposes a disproportionate burden of negative impacts on the residents and businesses around these station locations.** (See attached spread sheet – Appendix E)

- Providing additional bus service by adding #83 bus on Lexington and #60 circulator from Victoria to Hamline and south to St Clair does not provide adequate mitigation for residents and businesses near Western, Victoria and Hamline. The Metropolitan Council Response to the DCC Report (January 2008) claims that these additional bus lines will provide access to transit within a ¼-mile of most locations. But this does not offset the lack of direct access to LRT and the greatly reduced service of the #16 bus, which has the second highest ridership in the entire Twin Cities metro area.

Economic inequities that are not adequately addressed in the SDEIS include:

- The reduced transit access described above also has economic consequences for residents and businesses near Western, Victoria and Hamline, including:
  - Significant increases in time required for residents and local business owners and workers to travel to and from work and other necessary destinations;
  - Loss of business opportunities for small business owners located near Western, Victoria and Hamline, due to reduced transit access for customers, while competitors adjacent to LRT stations enjoy improved access;
  - Reduced incentive for new development to locate in these areas.
- If these three stations are not built, the FEIS should address the need for the LRT project to provide some alternative mitigation, such as maintaining 10-15 minute service for the #16 bus, to offset the negative economic impacts on local businesses and non-profits. The high percentage of ethnically diverse small businesses make this an environmental justice issue that must be addressed in the FEIS.

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

- i. To avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- ii. To ensure the full and fair participations by all potentially affected communities in the transportation decision-making process.
- iii. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

With no stations at Western, Victoria and Hamline, and reduced #16 bus service, the disproportionately high impacts on residents and businesses would not be avoided, minimized or mitigated, and the receipt of benefits by minority and low-income populations would be reduced and significantly delayed.

UPDC also questions the adequacy of the criteria and process by which station locations were selected for inclusion in the project. In commenting on the proposed scope of the SDEIS, NEPA

Implementation Supervisor, Kenneth Westlake notes: *“Three additional stations are being considered to serve the environmental justice neighborhoods at Hamline Avenue, Victoria Street and Western Avenue in St Paul. A Central Corridor website...indicates these may be dropped from consideration due to cost factors. The SDEIS should provide a clear explanation of what factors, such as ridership numbers, safety concerns, or system efficiencies, justify which stations are retained for detailed analysis or dropped from further consideration. Cost alone appears to be an insufficient basis, since most of the stations have similar costs.”* (SDEIS – Appendix A)

In reviewing the analysis of the three stations, the SDEIS acknowledges that *“the strategic location of stations in minority or low-income population areas has the potential to directly and indirectly benefit these communities...”* But the *Evaluation of Western, Victoria, and Hamline Station Options -- December 2007*, prepared by DMJM Harris, concludes that *“Adding any one of the three stations raises FTA’s Cost Effectiveness Index (CEI) from \$26.05 to between \$26.33 and \$26.55. The project needs to be under \$24.00 to receive an FTA recommendation for entry into final design and construction funding from the New Starts program.”* (See Appendix F) This would seem to indicate that the decision to include only the infrastructure in the project, postponing build-out to some future, undefined date, was mainly based on the constraints of the CEI.

UPDC agrees with NEPA Supervisor Kenneth Westlake that cost and the CEI are an insufficient basis for determining which stations will be built out. We believe that Environmental Justice should be an important criterion as well. But the Met Council’s *Response to the District Councils Collaborative Research Report -- February 2008* (Appendix G) indicates that *“Transportation service equity was not a criteria used in the siting of stations... in 2001. This report also claims that “...the aims of environmental justice are to identify and address, as appropriate, disproportionately high and adverse... effects of programs, policies and activities on minority and low-income populations.”* The report continues: *“A requirement to ensure that benefits are proportionately realized by all populations is not part of this executive order.”*

**UPDC disputes this claim and urges the project seriously consider the possibility of building out one of these stations and postponing construction of another station -- perhaps Capitol East where the 10<sup>th</sup> Street station is close by and ridership is projected to be lower than the Hamline station.** Building at least one station in the Environmental Justice neighborhoods around Hamline, Victoria and Western would help minimize and mitigate the disproportionate negative impacts on these minority and low income populations. By neglecting to study such an option, we believe the project denies, reduces and significantly delays the receipt of benefits for these minority and low income populations.

**UPSD asks that the FEIS specify environmental justice as an important criterion for selecting station locations and that every effort be made to include build-out of one of these three stations in the project, even if another planned station must be postponed to accommodate the CEI.**

##### **5. The need to involve the community in decision-making about LRT throughout planning, design, and construction.**

UPDC believes that a robust community process is essential “to ensure that the Central Corridor LRT provides all possible benefits for the people it serves, from downtown to downtown, and all

along the corridor.” We were pleased by the appointment of a community representative to the Central Corridor Management Committee (CCMC) and by the early establishment of a Community Advisory Committee (CAC) and a Business Advisory Committee (BAC). We also appreciated the “Listening Sessions,” held in February 2008, which provided an opportunity for community members to speak directly to the Metropolitan Council about their concerns.

However, there are several aspects of the current Public Engagement Process that we find lacking. We do not think the SDEIS has adequately addressed these issues, as they relate to FTA requirements for community participation. UPDC believes that the FEIS should provide for full consideration to be given to the concerns of neighborhood organizations, residents, and businesses in the decision-making process for all aspects of the LRT project. Here are a few areas where we consider the current Public Engagement Process to be inadequate.

- Although the CAC is meant to be a community advisory body, the members do not have the opportunity to discuss issues or to make CAC recommendations to the CCMC or the Met Council. Meetings consist mainly of technical presentations by engineers, with little time allowed for questions and comments. No motions are allowed to be put forward for consideration and no votes can be taken on possible recommendations. We believe there should be more opportunities for group discussion, potentially resulting in recommendations from the group.
- CAC member contact and discussion between meetings is discouraged. Despite many requests, the Met Council staff has refused to circulate any e-mail or phone lists for the CAC members. Given that the CAC is a public body, this restriction is unfortunate and inappropriate. We believe member contact and discussion should be facilitated, not discouraged.
- We are concerned that the membership of the BAC does not have sufficient representation from small and minority-owned businesses, and that the needs of these groups are therefore not being given sufficient attention. We support the inclusion of more small and minority-owned business representatives on the BAC.
- There is a lack of transparency in the planning process for the project. Requests for data, reports, answers to questions, and meetings with experts must be placed through the Community Outreach Coordinators, who often do not return phone calls, do not provide complete answers, or take an inordinate amount of time to respond to time-sensitive queries. We believe it is essential that public requests for data and meetings be promptly fulfilled.

**UPDC believes it is critical that the FEIS require a more robust, substantial community engagement process for the LRT project going forward.** The SDEIS cites the setting up of the CAC and BAC, the hiring of community outreach coordinators, the production of informational materials, and the number of meetings held and people reached as evidence of the extensiveness of the community engagement process. What they do not measure is the degree to which the community engagement process has provided the public with a sense that their comments and concerns can make a difference. Ironically, the most effective public engagement opportunity to date was the listening sessions in February 2008, which were set up only after extensive pressure from community organizations and individuals. UPDC believes that true community engagement is essential to ensure that the Central Corridor LRT meets the needs of the people it is meant to serve.

## **6. The need for comprehensive marketing studies to determine how the Central Corridor LRT plans can best meet the needs of both captive, transit-dependent bus riders and those**

**who have a choice of transportation options.** Many changes have occurred since the basic LRT alignment was determined in 2001, not the least of which is the doubling of gas prices. UPDS recommends that a quantitative marketing study be undertaken to determine if the rail line as proposed will effectively meet the current and future transportation needs of Saint Paul, Minneapolis, and greater metro area transit riders.

Any corporation contemplating a billion dollar investment would not move forward without an up-to-date marketing survey to assess the viability of their new product or service to attract new customers and meet the needs of regular clients. As the Central Corridor project prepares to move forward into final design, it would be irresponsible to proceed without a reality check to see if current plans, largely based on earlier assumptions, remain valid today.

**UPDC urges that a professional marketing company be retained to do a quantitative marketing study, using randomly selected local residents, to determine the actual needs and demands of future light rail riders.** The range of questions might address such issues as:

- Whether station locations are optimal and optimally spaced;
- Whether park-and-rides are needed to accommodate those not directly adjacent to the line;
- Whether planned transit speeds will meet people's needs or if higher speeds would attract more new riders;
- How fare increases would affect ridership;
- The potential impact of even higher gas prices on future ridership;
- What rider incentives would be most effective in attracting new riders; and
- How issues of safety, comfort, pedestrian access, bicycle access, and business parking would affect the success of the new LRT as a transit improvement and economic stimulus to encourage new development.

UPDC appreciates the opportunity to comment on the SDEIS. We hope the FEIS will address these issues and we look forward to your responses.

Sincerely,



James Marti  
President  
Union Park District Council

Attachments:

- Appendix A – Green Streets Summary Report
- Appendix B – UPDC letter to Met Council Chair Peter Bell
- Appendix C – District Councils Collaborative report on Additional Stations
- Appendix D – Map of station locations
- Appendix E – Spreadsheet of minority and low-income percentages at planned stations and infill stations
- Appendix F -- DMJM Harris stations study
- Appendix G – CCPO response to DCC stations study





**See Appendix 2 for the following comment attachments: Union Park District Council**

1. Snelling Green Streets summary report
  2. District Council 13 letter to Chair Peter Bell.
  3. DCC Report\_ Additional Stations: Making the Case for Hamline, Western, and Victoria
  4. DCC corridor demographics map
  5. Central Corridor LRT evaluation of Western, Victoria, and Hamline Station options issue
  6. Central Corridor LRT response to DCC Additional Stations report
  7. station area demographics table
-

The University Avenue Business Association is very concerned that the significant increase in the projected loss of street parking will have a negative impact on the small businesses along the corridor. We co-authored the following Op Ed article which appeared in the Pioneer Press, which we would like to enter in to the formal record of comments for the SDEIS.

Op Ed Pioneer Press August 7, 2008

### **LRT and parking: a view from the street**

By William Baker, Peter Vang and Gregory Hynan  
[Article Last Updated: 08/06/2008 06:51:18 PM CDT](#)

The Central Corridor light rail project is intended to address regional transportation needs, but it is also important to understand its impact on the streets and sidewalks of the community through which it runs. With more design details now being filled in, it is clear that we need to do a better job balancing regional goals with the critical needs of businesses that are operating along University Avenue.

Just weeks before the City of St. Paul give Municipal Consent to the LRT project, it was announced that most on-street parking would be eliminated — a significant reversal from earlier projections. This is a critical issue to the businesses and communities along University Avenue, who are now looking at not only dealing with the short-term disruptions caused by the construction of the line, but the permanent loss of street parking.

**The elimination of street parking** hurts small businesses disproportionately because they typically don't have off-street parking and are completely reliant on the few spots in front of their stores. Some have suggested shared off-street parking, but this is not a complete solution, nor is it cheap. Off-street parking requires almost twice as much land as on-street, when you factor in need for driveways, lanes and ramps. It takes approximately one acre to accommodate 125 parked cars, and we are slated to lose about 1,000 street parking spots. With land selling for more than \$1 million per acre, the replacement costs for land alone could run in excess of \$10 million. Who will pay for this? There is also the cost of constructing the parking lots and the challenge of creating management and maintenance agreements. It must be clearly understood that off-street parking lots, while helpful, are not a complete remedy. Studies show there is a measurable decline in retail traffic because customers are less willing to use off-street parking ramps.

Loss of street parking also detracts from the walkability of the corridor, which is important to businesses as well as a safety issue. Pedestrians do not feel as comfortable without a buffer of parked cars. Picture a mother with a stroller several feet from a bus or truck going 30 mph. A recent study by the University of Connecticut showed that " ... centers with on-street parking and other compatible characteristics such as generous sidewalks, mixed land uses and higher densities recorded more than five times the

number of pedestrians walking in these areas compared with the control sites, which lack these traits."

**Our first preference is** to keep as much street parking as possible. We need better information on who is driving on University Avenue. Local traffic patronizing businesses on the corridor should be given priority, and perhaps other traffic could be diverted to the freeway frontage roads. This eventually may allow the conversion of a driving lane to street parking. Another option to explore is allowing street parking to continue except during the afternoon commute. We also should explore the possibility of designating some of the intersecting streets for timed commercial parking.

We understand that all major infrastructure projects require sacrifice and disruption — and we are not arguing against the light rail project. However, we are asking that the needs of the businesses on the ground be considered and balanced against regional needs. For starters, we are asking for more timely information, for a clear understanding of who is responsible for solving these problems, what the timeline is and what financial resources are available for solutions.

*William Baker is the co-chair of the Minnesota Hmong Chamber of Commerce. Peter Vang is chair of the Hmong Business Association, and Gregory Hynan is active in the University Avenue Business Association.*

Additionally, we would like to enter the following case study from the recent Lake Street reconstruction, excerpted from “Taking it to the Street: How Roadway Design Helped Shape a Neighborhood’s Development, by Tony Proscio. This is a case study from the Payne-Lake Community Partners, April 2005

“On Street Parking had been steeply reduced in the original Lake Street redesign to accommodate left-turn lanes – a move that caused particular anxiety among merchants along the street. Yet, as the Project for Public Spaces pointed out, “Curbside parking is more than a vehicle function: It provides a physical and psychological buffer between pedestrian and moving traffic. It is also critical to the perception of a neighborhood shopping district as being convenient”. In the initial plan, the 1.8- mile section of Lake Street was to lose some 65 on-street parking spaces – 30 percent of the total – largely to make room for left turn lanes...” “From the perspective of transportation alone, the loss of parking made sense. Many curbside parking spaces were empty, and traffic was slow at some intersections because of left turns and other congestion. The solution might seem obvious: trade the unused parking for a smoother traffic flow. But if the goal was to redevelop the commercial strip – a process barely underway, with many new and still fragile shops depending on drive-up customers – the calculation became more complicated. In such an environment, the importance of on-street parking is not only to accommodate as many cars as possible, but to create a general impression that *it’s easy to shop here*. To many merchants, a healthy percentage of unused parking spaces may actually be a positive thing. Their subliminal message: Stop in now.

Because of the elimination of turn lanes and other changes in the design, the county was able to put most of the on-street parking spaces back into the construction plan for Lake Street.”

We request that the Met Council and the city of St. Paul initiate a process to determine how to save the maximum number of street parking spaces and to make the design of the light rail project more supportive to local businesses.

---

**University UNITED**  
**1954 University Avenue, St. Paul, MN 55104**

**Review of Supplemental Draft Environmental Impact Statement for Central Corridor Light Rail Project, and Policy Positions Relating to LRT**  
Approved August 18, 2008

***Build Stations at Western, Victoria and Hamline***

University UNITED strongly supports the building of stations approximately every half-mile along University Avenue and specifically calls for including stations at Western, Victoria and Hamline Avenues during the first phase of construction. The current omission of stations does a disservice to the most transit dependent population along the corridor and has a prejudicial impact on the communities with the highest percentage of low income residents and people of color.

The omission also precludes the catalytic role LRT can have on development in these areas particularly in need of job and housing opportunities.

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

***Oppose the Excessive Loss of Street Parking***

Because a number of different agencies are responsible for some issues, like the projected loss of street parking, we address our comments to both the Met Council and the City of St. Paul. The Met Council needs to study how the removal of street parking impacts pedestrian safety and walkability, and the effects it will have on small businesses.

The Met Council traffic engineers report that eliminating one traffic lane in each direction would create failing levels of service at key intersections. These calculations are estimates that could be wrong by a substantial margin of error, as was seen with the recent miscalculations of projected traffic congestion after the collapse of the I-35W Bridge. The upcoming lane closures caused by the construction of LRT will present a “real time” opportunity to assess actual impacts on traffic. If traffic is manageable on University Avenue and surrounding streets during the construction lane closures, then we should keep one lane closed permanently and restore as much street parking as possible.

We need assurances from the City that its goal is to keep as much street parking as possible in the short term, and in the long term keep/ restore street parking when circumstances allow the removal of a lane of traffic. The city should pro-actively work to lessen driving trips on University Avenue, without unduly impacting commerce, with a variety of travel-demand management strategies, and by exploring the diversion of non-local traffic to alternative streets.

In the short term street parking should be retained except during afternoon peak rush hours.

***Parking Mitigation Strategies***

If the loss of street parking is unavoidable, we support a variety of potential mitigation steps. These could include the creation of short term street parking on blocks intersecting University Avenue targeted to retail traffic use, and the development of plans for off-street shared parking for as many blocks as possible. The City needs to reassess its parking regulations and the usage of alleyways to enhance off-street parking options. Creating off-street parking lots will require considerable financial resources estimated to be in excess of \$10 million, and we request that the City and Met Council seek to secure that funding.

### ***Station Design and Public Art***

The outreach work done to date on the design of the LRT stations, and the proposed process for a public art have not sufficiently engaged the community. It appears that continuing the current process will result in designs that do not reflect the unique, special character of the different neighborhoods. We request that Met Council suspend its current approach and work with community and design professionals to create a better process. We also recommend that design professionals from area universities and design centers be incorporated into an oversight and review process.

### ***Streetscape***

We recommend that the LRT project be designed and constructed in accordance with the “Complete Street” guidelines and that it compliment and reinforce all other public and private development along the corridor. Streetscape design is critical to promoting a safe, attractive and pedestrian friendly environment which will enhance the transit experience and help ensure the success of local businesses. It is particularly important to have a very open and inclusive community process for this phase of the work, which should engage the local business community including the University Avenue Business Association, the Hmong Business Association and the Hmong Chamber of Commerce. We concur with the City of St. Paul that much of this work should be done in the Preliminary Engineering phase. We also recommend that design professionals from area universities and design centers be incorporated into an oversight and review process.

### ***Community Process***

The public outreach process of the Met Council for the LRT project has not been adequate. Information has not been presented in a timely fashion, as typified by the last minute notification of the excessive loss of street parking. Critical policy decisions relating to station design and public art were made unilaterally by project staff with virtually no public input. The request for additional information made, such as the possibility of an additional station at Cleveland Avenue, has not been undertaken. Important policy decisions are being made without adequate information about construction schedule, staging and impacts. The overall process has not allowed for genuine, respectful, community dialogue. We do not accept a conclusion that the quantity of community meetings equates to a quality public process.

When information has been presented it has often been in a graphic form that is not readily understandable by the general public. The images used to convey the track and station alignments and the loss of street parking were basically civil engineering drawings. At the request of the community, **U-PLAN**, a program of University UNITED, translated these engineering drawings into an accessible and interactive graphic format which it posted at [www.u-plan.org](http://www.u-plan.org), so people could understand them.

We regret that the City of St. Paul has not taken a stronger role in ensuring a more successful public outreach process by Met Council. There must be minimum citizen participation standards that are maintained by the city to protect the community during the planning for all significant development projects - even if the project is undertaken by another agency. We recommend that the City convene a Task Force to develop binding protocols for how a outreach process should be undertaken, similar to that recently done by Minneapolis. (Attached) Among the noteworthy elements are:

- “Public participation seeks input from participants in designing how they participate...
- Public participation provides participants with the information they need to participate in a meaningful way.
- Public participation communicates to participants how their input affected the decision”.

### ***Marketing/ Branding***

The continued use of the term “Central Corridor” squanders the opportunity to connect the identity of the LRT project to the branding of the University Avenue corridor. Naming of the line and the individual station areas should be integrated into marketing for the corridor. We urge that a public process be undertaken as soon as possible to help develop a marketing/ branding plan for the project and the corridor.

### ***Health Impact Assessment***

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

### ***Technology and Environmental Enhancements***

The upcoming construction of LRT and the anticipated excavation of the street offer an opportunity to simultaneously incorporate a number of technological and environmental improvements beneath the roadway. These could include fiber optic or other communications cable, a “District Energy” type heating and cooling system, other environmental systems including piping for ground source heat pump systems, and the possible burial of utility lines in the Prospect Park neighborhood. A multi-jurisdictional task force should be created to explore and plan for the feasibility of such opportunities.



## WEST BANK COMMUNITY DEVELOPMENT CORPORATION

1808 Riverside Avenue South, Minneapolis, Minnesota, 55454 • 612.673.0477 • FAX 612.673.0379

July 25, 2008

### Comments on Central Corridor LRT Supplemental Draft Environmental Impact Statement

The West Bank CDC and many other Cedar Riverside organizations and individuals campaigned long and hard to convince the Met Council to connect the Cedar Riverside station to Cedar Avenue. We are gratified to see that the present plans include an elevator connecting the station platform to the Cedar Avenue Bridge.

However, we continue to be concerned about the revisions described in the Supplemental Draft Environmental Impact Statement. The revised connection with the Hiawatha Line and the wasteful roadway design surrounding the Cedar Avenue Station squander the opportunity for new real estate development around the station and greater connectivity across the dismal divide presently known as the Washington Avenue Trench.

Specifically, the plan includes the following mistakes:

1. The Cedar Avenue diamond intersection ramps: The proposed reduction in size and character of Washington Avenue as it crosses the Washington Avenue Bridge and goes into downtown offers an opportunity to dispense with the freeway-like design of the interchange between Washington and Cedar Avenues. The ramps off of Cedar where designed for high volume, high speed traffic. The new two lane "parkway" that Washington will become could be served by a more urban intersection with much less roadway surface.

If, for example, the proposed ramps east of Cedar were two-way rather than one-way, the ramps west of Cedar could be completely eliminated. This would free up significant land in a key strategic location within crawling distance of the LRT station.

2. New Hiawatha connection: the proposed route change to connect the Central Line to the Hiawatha Line cuts through a significant developable parcel and interferes unnecessarily with a potential connection between 15<sup>th</sup> Avenue and the new Washington Parkway. See attachment.

The developable parcel itself is already owned by the City of Minneapolis and, when combined with the land made available by removing the east bound exit ramp to Cedar Avenue, creates a 2 acre development site. The possibility of re-connecting 15<sup>th</sup> Avenue would enhance the development of this site as well as improve the overall quality of the urban environment.

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

**Tim Mungavan, Executive Director**



Previously Community Solutions Fund





## WEST BANK COMMUNITY DEVELOPMENT CORPORATION

1808 Riverside Avenue South, Minneapolis, Minnesota, 55454 • 612.673.0477 • FAX 612.673.0379

July 25, 2008

### Comments on Central Corridor LRT Supplemental Draft Environmental Impact Statement

The West Bank CDC and many other Cedar Riverside organizations and individuals campaigned long and hard to convince the Met Council to connect the Cedar Riverside station to Cedar Avenue. We are gratified to see that the present plans include an elevator connecting the station platform to the Cedar Avenue Bridge.

However, we continue to be concerned about the revisions described in the Supplemental Draft Environmental Impact Statement. The revised connection with the Hiawatha Line and the wasteful roadway design surrounding the Cedar Avenue Station squander the opportunity for new real estate development around the station and greater connectivity across the dismal divide presently known as the Washington Avenue Trench.

Specifically, the plan includes the following mistakes:

1. The Cedar Avenue diamond intersection ramps: The proposed reduction in size and character of Washington Avenue as it crosses the Washington Avenue Bridge and goes into downtown offers an opportunity to dispense with the freeway-like design of the interchange between Washington and Cedar Avenues. The ramps off of Cedar where designed for high volume, high speed traffic. The new two lane "parkway" that Washington will become could be served by a more urban intersection with much less roadway surface.

If, for example, the proposed ramps east of Cedar were two-way rather than one-way, the ramps west of Cedar could be completely eliminated. This would free up significant land in a key strategic location within crawling distance of the LRT station.

2. New Hiawatha connection: the proposed route change to connect the Central Line to the Hiawatha Line cuts through a significant developable parcel and interferes unnecessarily with a potential connection between 15<sup>th</sup> Avenue and the new Washington Parkway. See attachment.

The developable parcel itself is already owned by the City of Minneapolis and, when combined with the land made available by removing the east bound exit ramp to Cedar Avenue, creates a 2 acre development site. The possibility of re-connecting 15<sup>th</sup> Avenue would enhance the development of this site as well as improve the overall quality of the urban environment.

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

**Tim Mungavan, Executive Director**



Previously Community Solutions Fund

# **Public Hearing Transcripts**

8408METCouncil (3)

0001

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

---

METROPOLITAN COUNCIL  
LIGHT RAIL HEARING  
August 4, 2008  
Wilder Foundation  
St. Paul, Minnesota

---

0002

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BELL: I'd like to call the public hearing to order. One announcement that I think it's important to make. Those of you that may have parked in the Alde parking lot that's right adjacent to the building, we would ask you to move your car to the parking ramp right here. It is at risk of being towed, which is never a good thing. So I would ask you to do that.

I'd like to welcome all of you to the first of three public hearings. I'd like to extend a particular welcome, I think we have, if I've surveyed the room correctly, three elected officials. Senator Ellen Anderson right up here in front. Welcome. Glad to have you with us this afternoon.

Commissioner Janice Rettman, I saw you here. Yes. How are you? Welcome. Oh, yes. I saw Commissioner Carter, my old friend Commissioner Carter as well.

Are there any other elected officials here with us today? I'd like to welcome all of you, as well as, of course, our elected officials.

The purpose of these three hearings is to get comments on the SDEIS. This is a part

0003

1  
2  
3  
4  
5  
6  
7  
8  
9  
10

of a rather elaborate process that the FTA, the Federal Transit Administration, has laid out and we are seeking public comment on that.

There are nine key issues that we are seeking comments on, and we will also be accepting written testimony up to August 25th. It is our hope after this process to submit our application for final design about September 5th, and then go through a process of interaction with the FTA. Hopefully they'll allow us into final

8408METCouncil (3)

11 design sometime in the February/March timeframe  
12 of 2009.

13 Before we get started, I also want  
14 to introduce some of my colleagues on the MET  
15 Council. Georgeanne Hilker is to my right. Polly  
16 Bowles is the newest member to the Council to my  
17 far left. Rick Aguilar is next to her, and to  
18 my left is Robin Cauffman, who is in charge of  
19 public outreach.

20 Before we get started with taking  
21 the official testimony, I'd like to invite Kathy  
22 O'Brien, also on the staff of the Central  
23 Corridor Project staff, to do a brief  
24 presentation on the SDEIS. Kathy.

25 MS. O'BRIEN: Yes. Thank you,

0004

1 Peter. Just as a little bit of a reminder to  
2 folks, and I will be brief since the focus of the  
3 day today is to really receive input from you all  
4 in the audience.

5 But just as a very brief reminder  
6 about what the DEIS is and the environmental  
7 process generally, I'll spend a few minutes  
8 talking about that process now.

9 The supplemental DEIS, as Peter  
10 mentioned earlier, focused on nine key elements  
11 that had changed from the 2006 DEIS that was  
12 published. A list of those key changes are on  
13 the screen as we see know.

14 Starting at the east end of our  
15 corridor, there was some changes that were being  
16 proposed on how the central corridor would  
17 connect to Hiawatha light rail near the Metrodome  
18 and also over on the West Bank at the University  
19 of Minnesota.

20 One of the elements that got a lot  
21 of attention in the press and in the various  
22 other locations as well was at the U of M East  
23 Bank. The 2006 DEIS had talked about a tunnel,  
24 and we are now looking at a different solution  
25 there, an at grade solution, that would be a

0005

1 transit pedestrian mall on the East Bank at  
2 Washington Avenue.

3 Future infill stations was a  
4 comment that was heard very strongly, I think,  
5 through the DEIS public comment period. The  
6 desire to look at the opportunity for additional  
7 stations through the area of St. Paul.

8 We have looked in the DEIS -- the  
9 supplemental DEIS I should say, we have looked at  
10 an additional station at Hamlin Avenue, at  
11 Western Avenue and also at Victoria Street.

12 Also, the Capital area. That's  
13 another location where there has been a change in  
14 the LRT alignment and the station location from  
15 what had been disclosed to the public in the 2006  
16 DEIS.

17 Issue number five had to do with  
18 Downtown St. Paul and some changes in the  
19 alignment there of consolidation of two stations  
20 into one on the diagonal block at Fourth and  
21 Fifth and Minnesota Streets. Also some different

8408METCouncil (3)

22 ways in which we could connect to the back of the  
23 depot and to the operations and maintenance  
24 facility in Downtown St. Paul.

25 Traction power substations, although  
0006

1 the 2006 DEIS talked about the need for those,  
2 there was no geographical area for locating  
3 those. We have done that in the supplemental  
4 DEIS and that information is contained in the  
5 document.

6 We also looked at three-car trains  
7 and building a system that would have platforms,  
8 that would have power substations and other  
9 elements that would be adequate for operating  
10 three-car trains in the future when that would  
11 become a desirable and a required element of  
12 service.

13 Vehicle maintenance and storage  
14 facility was another key element that is being  
15 placed in Downtown St. Paul and that supplemental  
16 DEIS gives more detail on where that facility  
17 would be located and how the connections to it  
18 would be made.

19 Then the final element of our nine  
20 key changes is the Washington Avenue Bridge and  
21 some of the retrofitting of that structure that  
22 would need to take place in order for LRT  
23 operations to use those.

24 There's a map here that generally  
25 shows the locations for some of these changes and  
0007

1 where they occur. There is also a version of  
2 this map in the back of the room for those of you  
3 who may give your testimony and may want to  
4 review some information on your way out the door.  
5 There is information set up in the back of the  
6 room on this map and also some of the other key  
7 elements that the supplemental DEIS reviews.

8 Very brief overview, as I said, the  
9 environmental process, where we've been and also  
10 where we're going.

11 2001 was when there was a scoping  
12 process that was overseen actually by Ramsey  
13 County at that time looking at a number of  
14 different alternatives, both of in terms of mode  
15 and in terms of where the transit service would  
16 be operating.

17 From that scoping process, the  
18 field was narrowed down to just a couple  
19 different options in terms of transit modes and  
20 then also two transits operating on University  
21 and Washington Avenue.

22 From 2002 to 2006, the process was  
23 developed to get to a draft environmental impact  
24 statement on that mode.

25 At 2006, the cap stone to the DEIS  
0008

1 process was the Metropolitan Council actually  
2 taking action in June of that year to establish  
3 light rail transit as the locally preferred  
4 alternative operating on University and  
5 Washington Avenues.

6 So that was taking place in 2006,  
Page 3

8408METCouncil (3)

7 and then the Council applied to the FTA and  
8 entered into preliminary engineering, and that's  
9 the process we've been in now since about 2007.

10 During the preliminary engineering  
11 process, there were these key changes that have  
12 been disclosed and proposed for the project and  
13 that was what led to the publication and  
14 development of the supplemental DEIS.

15 Where we're going is that the  
16 public comment period, as Peter and others have  
17 talked about, will end for the supplemental DEIS  
18 on August 25th. At the time that the public  
19 comment period closes, following that, the MET  
20 Council will take action to formally adopt any  
21 changes to that locally-preferred alternative.

22 Then the process of preparing the  
23 final environment impact statement will begin.  
24 That final DEIS, the purpose of it is to document  
25 the final preferred alternative, exactly what

0009

1 it's going to be, where it will go. Also the  
2 impacts of that preferred alternative.

3 Commitments to mitigation are also  
4 a part of the SDEIS, and finally, we'll also  
5 respond to comments that were received both on  
6 the 2006 DEIS, as well as the supplemental DEIS.

7 For those of you who are then  
8 giving testimony today or submitting comments  
9 otherwise, the final SDEIS will document those  
10 comments. It will also document the Council's  
11 response to those comments.

12 Then the final real cap stone to  
13 the environmental process is the FTA's issuance  
14 of a record of decision which we are currently  
15 estimating will be occurring in early 2009, and  
16 that would basically be the end result of the  
17 environmental process; also documenting other  
18 decisions that were made.

19 As I mentioned earlier, period  
20 closes August 25th. If you have comments, to get  
21 them in before that time. Comments are welcome  
22 in almost any media you can imagine. We have a  
23 telephone hotline set up for those of you who  
24 would care to call in your comments.

25  
0010

1 e-mail and there's a link to our website  
2 [www.centralcorridor.org](http://www.centralcorridor.org) for those of you who may  
3 want to e-mail in your comments. They're also  
4 being accepted by regular mail and then, as we  
5 mentioned, by testimony at the hearing today and  
6 some of our other hearings that are coming up.

7 We do have a hearing on August 7th,  
8 this Thursday in the evening. Those of you might  
9 want to come to another open house and hearing,  
10 that's an opportunity for you to do so.

11 Also this Saturday, August 9th  
12 there will be a hearing at the Goodwill Easter  
13 Seal. So just across the street from the  
14 project. That will be at 2:00 o'clock in the  
15 afternoon.

16 Peter, I know you had wanted to go  
17 over the ground rules a little bit with the folks

8408METCouncil (3)

18 and so if you want to do, I will conclude my  
19 presentation.

20 MR. BELL: Kathy, thank you very  
21 much. I appreciate that. There are a few rules  
22 of the road, no pun intended, for those that  
23 would like to address the issue of the  
24 supplemental DEIS.

25 Before I go through them, though, I  
0011

1 want to underscore an important point and that's  
2 that we at the Council take this comment period  
3 very, very seriously. The comments both, written  
4 ones and presented at one of the three hearings  
5 are not just important to the process, but  
6 important to the MET Council to get a sense of  
7 how people view some of the changes -- some of  
8 the nine changes that are presented.

9 People wishing to speak should  
10 register at that front desk and when you  
11 register, you need to check the box in the far  
12 right indicating that you do wish to speak.

13 You will be called in the order in  
14 which they appear on the signup sheet. I ask for  
15 your indulgence beforehand because I will  
16 mispronounce some of your names. So I ask for  
17 your consideration with that.

18 Each speaker should state his or  
19 her name, address and the organization they  
20 represent, if any. It's important that people  
21 identify themselves because, as you can see, this  
22 meeting is being taped. We have a transcriber.

23 Individuals will be given three  
24 minutes. If, however, you are representing a  
25 group, we're going to give you five minutes for a  
0012

1 presentation. Ms. Cauffman is going to be keeping  
2 the time and informing me. I'll try to let  
3 everyone know when they have a minute left.

4 As I've said a number of times, as  
5 well as Kathryn O'Brien, written statements in  
6 addition to oral comments are welcomed and  
7 appreciated. People should limit the scope of  
8 their comments really to the SDEIS. Those nine  
9 areas that Kathryn reviewed is really what we are  
10 taking comment on today.

11 To maximize the number of people  
12 that are given an opportunity to speak, people  
13 that have addressed the Council at one time at  
14 one of the previous listening sessions will be  
15 asked to wait until everyone else has had an  
16 opportunity because we want to get as broad a  
17 breadth of comments as we can.

18 It's also important to note that  
19 those of us on the Council will not be  
20 responding. So this isn't an opportunity for  
21 give and take dialogue. We're going to be  
22 receiving the testimony, hearing that, but we're  
23 not going to be asking follow-up or clarifying  
24 questions or engaging in discussions about those.

25 The first speaker that we have is  
0013

1 Ul tan Duggan.

2 MR. DUGGAN: Good afternoon,  
Page 5

8408METCouncil (3)

3 Mr. Chairman. I know a couple of the  
4 commissioners. Mr. Auguilar knows me fairly  
5 well, I think.

6 It's a pleasure to be here this  
7 afternoon and have this opportunity to speak with  
8 you. A small concern on my case is the Midway  
9 area. Not the rest of it, but I think the Midway  
10 area as represented and what is being done to the  
11 corridor.

12 Rule number 3 of the SDEIS is to  
13 expand opportunity for all users to move freely  
14 to, through and within the central corridor, and  
15 I think that's key. Within the simple corridor.  
16 Not just moving people from St. Paul to  
17 Minneapolis, or as Katie Courick says, "from  
18 Minneapolis to Minneapolis." That's the last  
19 thing she talked about the Republican Convention  
20 coming here.

21 A significant fact that you all  
22 know which you've presented us with these facts,  
23 that by 2030, there's going to be a huge increase  
24 in both population, employment and housing in the  
25 Midway area in particular. Somewhere between 13

0014  
1 and 30 percent population. Employment is about  
2 35 percent.

3 Obviously the light rail transit is  
4 I think thought out and proposed to try alleviate  
5 a lot of the situations and especially where are  
6 all those people going to be.

7 I attended a meeting last week in a  
8 local neighborhood about parking, and we were  
9 informed that parking has been reduced or will be  
10 reduced as a result of light rail transit to by  
11 about 900.

12 The SDEIS indicates somewhere that,  
13 well, you'll find 629 spaces within one block of  
14 the University Avenue. I suspect that those 629  
15 spaces are already avidly being used by people  
16 trying to shop in the Midway and all along the  
17 area.

18 Another concern that was raised at  
19 that meeting was that the Lexington  
20 Avenue/University intersection is the most  
21 challenged intersection for traffic. You have to  
22 wait possibly for two light changes to move  
23 through.

24 Why not then consider putting that  
25 station at Hamlin, which is an alternate. Don't

0015  
1 make Hamlin an alternate, make it a primary  
2 station. You won't have as much as a headache  
3 because you won't have that challenge that  
4 Lexington has.

5 I appreciate your time and  
6 opportunity to speak to you on these issues.  
7 Thank you.

8 MR. BELL: Thanks so much for your  
9 comment and taking the time in coming down.

10 Andrea Lubov.

11 MS. LUBOV: Mr. Chairman, members  
12 of the MET Council, my name is Andrea Lubov.

13 MR. BELL: Lubov.



8408METCouncil (3)

14 MS. LUBOV: I've prepared some  
15 written remarks which should have been  
16 distributed to all of you.

17 I'm a resident of St. Paul. I was  
18 a member of the Station Area Planning Committee,  
19 and I'm active with the Jewish Community Action  
20 and we've been working with Transportation Equity  
21 Stops for us at central corridor LRT stop at  
22 Hamlin, Victoria and Western.

23 At JCA we believe that working  
24 through these stops is consistent with our  
25 mission to eliminate social and economic

0016  
1 injustice. That's the area I would really like  
2 to speak to, that part of the SDEIS.

3 I believe I bring a unique  
4 perspective to this discussion. I am a retired  
5 economist with a Ph.D. from Washington State  
6 University. I spent 30 years working in various  
7 aspects of economic housing and when I retired  
8 the end of 2004, I was a partner in the economic  
9 consulting firm Anton, Lubov and Associates where  
10 we had the opportunity to work on the master  
11 plans for both the Cedar, Riverside and the  
12 Franklin stations of the Hiawatha line and to  
13 work in some of the early impact studies for this  
14 line.

15 I believe that there are some  
16 series problems with the way the data in the  
17 SDEIS section on Environmental justice is  
18 presented. The way that the data are presented  
19 they appear to underestimate the importance of  
20 the negative impact of the LRT because the  
21 authors compare the population in all of Hennepin  
22 and Ramsey County with the study area. In fact,  
23 the correct comparison would have been the  
24 non-study portion of those two counties and the  
25 study area.

0017  
1 On Page 3 and 4 of the handout that  
2 I've given you I've reproduced two of the tables  
3 that are in the SDEIS showing how the data was  
4 actually presented in those two tables and how I  
5 believe the data should have been presented. I  
6 think the importance is critical.

7 Because -- well, the report says  
8 that the minority and low income population will  
9 not bear a burden that is more severe or greater  
10 than magnitude than the impact felt by the  
11 community at large. That's on Page 138 in the  
12 report.

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

22 The same thing appears in the  
23 estimate of poverty. If you segregate the data  
24 showing the study area and the non-study area of

8408METCouncil (3)

25 the two counties, what you find is that the

0018

1 poverty rate in the study area as presented is  
2 three times the poverty rate in Hennepin and  
3 Ramsey County areas.

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

11 To say that the negative impact of  
12 the central corridor LRT are not  
13 disproportionately borne by sensitive  
14 communities, rather they are borne by all  
15 communities in the corridor is wrong in its face  
16 since clearly sensitive communities are  
17 disproportionately in share in corridor population.

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

25 As for the stations at Hamlin,

0019

1 Western and Victoria, the report refers to them  
2 as proposed stations. That only emphasizes that  
3 these stations may never be built. The language  
4 implies that building the infrastructure for the  
5 stations is really a way to quiet the  
6 transit-dependent populations and that they're  
7 not likely to get the stops they want or need.

8 If we fail to build at least one of  
9 these stations --

10 MR. BELL: You have about a minute  
11 left.

12 MS. LUBOV: Thank you. If we fail  
13 to build at least one of these stations at the  
14 time the LRT is constructed, I'm afraid that  
15 we're going to repeat and strengthen the results  
16 that happened in the Roger neighborhood when I-94  
17 was built.

18 Thank you very much.

19 MR. BELL: Thank you. I appreciate  
20 your comments and your obvious work on this.

21 The next speaker is Brian McMahon.

22 MR. McMAHON: Good afternoon, Chair  
23 Bell, members of the MET Council. Brian McMahon,  
24 Director of University United. We're a coalition  
25 of ten community groups along University Avenue

0020

1 and eight individual business representatives.

2 I'm here to speak to two points,  
3 one of which is included in your list of nine  
4 changes and one of which is not, but I think is  
5 of such importance that it needs to be addressed.

6 On the first one regarding the need  
7 to include three additional stations, we want to  
8 just reiterate our call for that. It's a very,  
9 very important social and economic equity issue.

8408METCouncil (3)

10 It's very clear that the people  
11 that are living and working around Hamlin,  
12 Victoria and Western are among the highest  
13 transit-dependent population in the corridor and  
14 in the entire metro area.

15 In addition, studies that we've  
16 done show that there are tremendous opportunities  
17 for redevelopment around some of those nodes. In  
18 particular in the one around Hamlin where we  
19 identified over 50 acres are either vacant,  
20 surface parking lots or getting ready for  
21 development.

22 It will be developed according to  
23 whether or not they have a station there, and  
24 clearly we are seeing light rail -- the potential  
25 of light rail as an inducement to bring about a

0021  
1 higher quality development of transit  
2 development.

3 The other point I want to speak  
4 about is the elimination of too many street  
5 parking spaces. We are very concerned that this  
6 is going to have a very, very negative, series  
7 impact on our area businesses.

8 We're concerned that the issue in  
9 looking at this has really only been framed  
10 through the lens of impacts on traffic that flows  
11 through the community and not on the needs of  
12 businesses or the pedestrian environments.

13 The loss of street parking by  
14 virtually every conversation I've had by small  
15 businesses is a very, very series matter, and  
16 many of them have said that they are literally on  
17 the verge of shutting down their business if they  
18 can not resolve this issue.

19 We recent had a -- developed a  
20 round table about a month or five weeks ago, and  
21 there were four or five real estate brokers.  
22 Every one of them spoke emphatically as to the  
23 negative impact that the loss of street parking  
24 would have on University Avenue.

25 Not only for the businesses

0022  
1 currently here, but for future development. In  
2 fact, a real estate broker said that one  
3 development that was starting to move forward has  
4 actually been put on hold until this issue is  
5 addressed. This is a very, very series matter  
6 that needs a lot more work.

7 In addition to the impacts on the  
8 small businesses, there's a series issues as it  
9 relates to pedestrian safety. As you know, the  
10 street parking does provide that buffering, real  
11 buffer between the pedestrians and the  
12 fast-moving traffic, the buses and trucks on  
13 University Avenue.

14 And we are very concerned that if  
15 you remove that buffer, the margin for error is  
16 very, very slight. We're talking about a foot or  
17 two by the time a pedestrian starts to cross that  
18 road. It's not enough, really, to provide that  
19 layer of safety.

20 This is not the time to weaken the

8408METCouncil (3)

21 pedestrian environment. This is actually the  
22 time to strength it because if we're going to get  
23 the full utilization of this light rail line, we  
24 do need to have a very, very enhanced pedestrian  
25 environment.

0023

1 A recent study by the University of  
2 Connecticut showed that, "centers with on-street  
3 parking and other compatible characteristics such  
4 as generous sidewalks, mixed land use, higher  
5 densities reported more than five times the  
6 number of pedestrians walking in those areas  
7 compared with the control sites, which lack those  
8 traits.

9 We want pedestrians on University  
10 Avenue. The shops want the pedestrians on  
11 University Avenue. The light rail want  
12 pedestrians on University Avenue. The last thing  
13 we want to do is remove that buffer that does  
14 make the pedestrian feel and is, in fact, a  
15 safety feature.

16 What are some of the options here?  
17 Well, first step would be to minimize the loss.  
18 We think there are a lot of things we can do to  
19 put back into the design of the LRT and look for  
20 opportunities to keep some of that street  
21 parking.

22 The other option is to see if we  
23 can divert some of the traffic that's currently  
24 on University Avenue. Perhaps to the frontage  
25 roads, thereby allowing for the possibly at least

0024

1 of removing one lane of traffic, if not all the  
2 time, at least for part of the day.

3 In other words, keep one lane for  
4 street parking except during the evening rush  
5 hours for instance.

6 Now, the option that's being  
7 discussed is off street shared parking lots, and  
8 while that is a positive thing --

9 MR. BELL: One minute.

10 MR. McMAHON: One minute, thank  
11 you. It's clearly not as efficient as on-street  
12 parking because it literally takes almost twice  
13 as much land per parking stall off street versus  
14 on street by the time you factor in curb cuts,  
15 drive lanes, ramps, things of that sort.

16 In fact, it is not a solution from  
17 the business standpoint because there's a very  
18 noticeable decline in usage of parking -- off  
19 street parking ramps versus on-street parking.  
20 So it's very, very important to try to keep as  
21 much on-street.

22 Finally, there is an expense  
23 involved, a huge expense involved to find an off  
24 street location for a thousand cars. We're  
25 looking at potentially \$10 million in private

0025

1 land cost. It takes --

2 MR. BELL: I need to ask you to  
3 wrap it up.

4 MR. McMAHON: 125 cars per acre.  
5 We're talking about 8 acres. Land values between

8408METCouncil (3)

6 1 and 2 million an acre. We're easily talking  
7 just in land costs, not to mention construction  
8 costs, about \$10 million.

9 There clearly needs to be some  
10 discussion about who is going to pay for all  
11 that. Thank you very much.

12 MR. BELL: Thank you for coming  
13 down. I appreciate your comments.

14 Steve Boland.

15 MR. BOLAND: Thank you. Chairman  
16 Bell, members of the council, my name is Steve  
17 Boland. I work for the greater frog town  
18 community development corporation. 533 Dale  
19 Street North. I live at 566 Selby Avenue and  
20 therefore crossing University just a couple of  
21 times every day just coming and going to work.

22 What brings me here to speak with  
23 you today is specifically focused about the  
24 street parking issue. As you look at the nine or  
25 so callouts from the many, many pages of the

0026

1 supplemental draft that is before you, that  
2 particular thing didn't get called out  
3 separately, but the creation of the three-car  
4 stations, the addition to the infill station,  
5 some other changes in the proposal have  
6 dramatically impacted on what will be left for  
7 street parking for University Avenue under the  
8 current design.

9 This is something that's a  
10 substantial concern to a greater frog town  
11 communities. Our organization works with the  
12 economic and housing opportunities of people in  
13 that area, and the reductions that we're talking  
14 about here could have a dramatic impact on the  
15 economic opportunities, and subsequently on the  
16 housing opportunities for people in that area.

17 If we are going to create a  
18 thoroughfare in the frog town neighborhoods where  
19 no street parking will be allowed, where the  
20 opportunity is to go through and not to go to the  
21 businesses that support that community, we feel  
22 that the economic impact on the area is  
23 substantial, drastic and we really urge you to  
24 take a look at some alternatives to this.

25 Our organization has called forward

0027

1 specifically four recommendations. I left a copy  
2 with Julie for your record. I would like to  
3 mention them here.

4 But my board specifically in  
5 endorsing these wanted to call out that we  
6 understand that there may be other, better ideas  
7 than these and we welcome that exchange, but  
8 simply saying someday we'll get to some idea that  
9 might somehow deal with this is not an acceptable  
10 alternative.

11 We would really like to have  
12 something addressed before that September  
13 submission that says here's what we've heard and  
14 what we think is important about preserving  
15 economic opportunity for small businesses in the  
16 greater frog town neighbors and presumably for

8408METCouncil (3)

17 University Avenue a whole.

18 Those four issues that we're  
19 calling for your attention on, one is to look at  
20 the idea of reducing the through traffic down to  
21 one lane during off peak hours and allowing us to  
22 do meter parking or other short-term parking in  
23 the traffic lane in non peak hours which we're  
24 presuming is the afternoon rush hour.

25 To be able to have half street

0028

1 parking for the lunchtime service for the  
2 restaurants in the frog town neighborhoods, to be  
3 able to have dinner parking for those same  
4 opportunities after 6:00 p.m., to be able to  
5 encourage all the nightlife stuff that is  
6 emerging and the cultural opportunities.

7 These are really important, and to  
8 be able to look at the actual traffic flows in  
9 those neighborhoods in those off-peak times. We  
10 think that if we need to have the train stations  
11 configured the way they are, then we don't need  
12 as much in that street parking -- or probably in  
13 the through traffic capacity during those times.  
14 We strongly urge you to look at going down to one  
15 lane of traffic for off peak hours.

16 The second recommendation that we  
17 are making for your recommendation is the removal  
18 of some of the non-signalized pedestrian crossings  
19 that are called for in the plan.

20 Many of our neighbors were unaware  
21 until just recently that the new design is  
22 looking at signalized crossing intersections every  
23 two blocks in our neighborhood, rather than the  
24 original version of the draft environmental  
25 impact statement when the engineering looking at

0029

1 quarter mile or longer between the ability to  
2 cross the street.

3 While we certainly would like to be  
4 able to cross the street at every single block,  
5 and I personally as someone who crosses that  
6 street frequently, would like that ability, we  
7 know that there are trade-offs to be made here.  
8 We strongly urge that the tradeoff is we have to  
9 walk a full block to get a signalized crossing  
10 versus the elimination and possible economic  
11 decimation of our neighborhood, then I think  
12 we'll walk the extra block.

13 That's something that our  
14 organization would encourage you to consider.  
15 That would not, of course, restore all off street  
16 parking. It would bring in more back to our  
17 neighborhood.

18 We are also asking you specifically  
19 to commit financial resources from this project  
20 to provide for the remediation of these lost  
21 parking spaces.

22 At this point there's no financial  
23 commitment from the project that they're going to  
24 be doing anything towards off street parking to  
25 make up for the street parking loss.

0030

1 And certainly there's a lot of

8408METCouncil (3)

2 conversation with the City of St. Paul in how to  
3 do that, how to create good signage, how to make  
4 sure people understand how to share those  
5 resources.

6 We support that heavily. We think  
7 those are great ideas, but there's going to need  
8 to be some dollars on the line and we really  
9 think it's important in this process that the  
10 Council understand that and commit to something.

11 MR. BELL: You have about minute  
12 left.

13 MR. BOLAND: Thank you. My fourth  
14 and final point on this is the commitment of  
15 financial resources to enhance pedestrian safety  
16 through this area.

17 If there are going to be areas that  
18 are two lanes of through traffic at all times,  
19 and we have no opportunity to buffer between 30  
20 mile an hour traffic and pedestrians, then we  
21 think that it's important that decorative,  
22 wrought iron rail, some kind of visual -- wrought  
23 iron, pardon me.

24 Some kind of visual separator, some  
25 kind of barrier. When there is absolutely no

0031  
1 potential to park there, you're not going to be  
2 able to walk across that space anyway. Give us  
3 some financial commitment to remediate what that  
4 looks like to enhance the safety of the  
5 pedestrians using the area.

6 Simply having a blank sidewalk six  
7 inches from your elbow into a 30 mile an hour  
8 traffic isn't a solution that we can support.

9 Very much appreciate your time  
10 today. Thank you folks.

11 MR. BELL: Mr. Boland, thank you  
12 very much. Appreciate your coming down.

13 The next speaker is Russ Williams.  
14 Mr. Williams, welcome.

15 MR. WILLIAMS: Chairman, members of  
16 the council, thank you very much. Russ Williams  
17 representing Fairview Health Services,  
18 specifically the University of Minnesota Medical  
19 Center Fairview at 2450 Riverside Avenue,  
20 Minneapolis.

21 As you all know, we have a hospital  
22 and clinics facility on the East Bank of the  
23 University of Minnesota campus. And we initially  
24 want to commend council for the mitigation  
25 efforts that have been put in the plan for the

0032  
1 traffic and other concerns that we have for  
2 primarily our patient and ambulance traffic on  
3 that campus, but also our staff and physicians as  
4 well.

5 We want to ensure and make the  
6 formal request here that those mitigation efforts  
7 continue to be considered, carried as part of the  
8 project. We feel very important specifically for  
9 our patient flow throughout, that people can  
10 access the clinic and hospital as easily as  
11 possible given the changes that are being  
12 proposed to Washington Avenues.

8408METCouncil (3)

13 Thank you very much.  
14 MR. BELL: Appreciate your coming  
15 down, taking the time.  
16 Joel Clemmer is our next speaker.  
17 Mr. Clemmer, welcome.  
18 MR. CLEMMER: Thank you. Chairman  
19 Bell, members of the council, thank you very much  
20 for having this hearing. Thank you for your work  
21 on this project.  
22 And I speak to you as an  
23 individual, although I'm a member of the District  
24 Council Collaborative and -- Groveland Community  
25 Council as taking a strong interest in the

0033

1 project.  
2 I find myself in a surprising  
3 position of needing to defend what I consider to  
4 be a common sense proposal, and that is given the  
5 fact that the communities along University Avenue  
6 here in St. Paul are disproportionately  
7 disadvantaged communities and disproportionately  
8 dependent on transit services, that the project  
9 in which we are investing actually improve the  
10 transit services that are available to them.

11 I'm afraid that we may have gotten  
12 off track, pardon that pun, in those terms.  
13 Basically I believe that our problem stems from  
14 the decision some time ago to space stations in  
15 this corridor approximately a mile apart. The  
16 problems created by that decision are those that  
17 we're dealing with now.

18 The basic outcome is that the  
19 so-called infill stations, I believe, should not  
20 be considered infill. They should be considered  
21 critical to the project in order to maintain  
22 transit services the people in these neighbors  
23 have come to expect.

24 I fear that we're go to make the  
25 problem worse in the sense of our plan to

0034

1 diminish our parallel bus service along that  
2 route. That makes little sense to me adding  
3 these two things together to say that we are  
4 indeed improving transit services when it appears  
5 that we are not.

6 Basically comparable cities,  
7 comparable systems to the one that we plan, have  
8 space leased stations much more close together  
9 than one mile apart. That's a basic problem  
10 that we need to rectify in a plan which I believe  
11 overall to be a great one for the City of St.  
12 Paul, and I thank you for your work on it.

13 MR. BELL: Mr. Clemmer, thank you  
14 very much. I appreciate your comments.

15 My next speaker is Ray Sebieck.  
16 Welcome.

17 MR. SEBIECK: Thank you for giving  
18 me my time here. My name is Ray Sebieck. I've  
19 lived here a long time, St. Paul right heart of  
20 the Midway. I've lived in the Midway for over 60  
21 some years so I'm pretty familiar with what's  
22 going on.

23 I just happened to hear about this



8408METCouncil (3)

24 through Channel 5 News. Now, I don't know if  
25 you've sent out other things about come on down

0035

1 to the hearing because I didn't hear about it. I  
2 just happened to catch it on the news which gives  
3 me an opportunity to voice some opinions about  
4 this whole thing.

5 To spend \$909 million on a project  
6 that's going to destroy the avenue, which is  
7 University, in our times of -- tough times, put  
8 it that way, not only in our state, but in the  
9 country, it seems kind of extreme.

10 That money, if available, it should  
11 be used to repair our streets, roads, highways,  
12 interstates and all the things that a lot of  
13 people travel.

14 Also, the project -- now, all in  
15 all, it probably is a good project in your minds.  
16 Not in mine. It's only going to be for like  
17 about maybe 5 to 10 percent of people that live  
18 in Minnesota. Probably less than 5 percent.  
19 That travel University Avenue by MTC right now.  
20 But you know -- I know, you know that everybody  
21 in this whole state is going to have to pay for  
22 that thing.

23 Now they talk about the light rail  
24 going down to Maplewood Mall. From what I  
25 understand, that thing hasn't made any money yet.

0036

1 So how is this one going to make up \$909 million  
2 is kind of my thought?

3 Aside from destroying the avenue,  
4 too expensive, you still need buses. If you have  
5 people that are living in between the stations.  
6 They're going to have to go down their same old  
7 corner to catch the bus to get down to the  
8 station. And if they got off the bus -- I mean,  
9 I'm sure the bus is still going to go downtown,  
10 they wouldn't even get off the bus. They'd keep  
11 right on running because they're not going to get  
12 on the Pen Avenue train, even though I understand  
13 there's a transfer involved.

14 Now, there's other issues in the  
15 future that I see. All these stations, they're  
16 going to require police enforcement also. You're  
17 going to get some low-lives living in there.  
18 You're going stock up with pillows and blankets  
19 because you're going to have a lot of homeless  
20 living in some of these places.

21 I don't know what it's going to  
22 take to derail the rail. The way it sounds, it's  
23 not going to be able to happen. You guys have  
24 pretty much into -- you've already got it pretty  
25 much into the plans.

0037

1 I'd like to see us in some form or  
2 fashion take a popularity vote and say how many  
3 people, how many citizens of Minnesota really  
4 want this rail? You know? I want you to let  
5 them know, hey, this is your future taxes and  
6 this is that.

7 I don't know. Hey, I finally got  
8 it off the my chest. Anyway I was looking for

8408METCouncil (3)

9 somebody to get it off. Anyway this is some of  
10 my points and I think they're valid. So thanks  
11 for listening.

12 MR. BELL: I appreciate you coming  
13 down and sharing them with us.

14 MR. CLEMMER: Thanks to Channel 5  
15 News.

16 MR. BELL: Barb Bolak is our next  
17 speaker. Welcome.

18 MS. BOLAK: Thank you. The  
19 comments I'd like to make is people live on the  
20 residential streets, like on Sherburn, there's  
21 going to be a parking issue. People that are  
22 homeowners need to be able to have a no fee  
23 parking permit so that if they go to the grocery  
24 store or go to a play or something, they don't  
25 come home at 10:00 o'clock at night and have to

0038  
1 walk five or six blocks from there.

2 That's one of the problems with the  
3 light rail is the parking issue. We do have  
4 parking here, but you need to have someplace  
5 where these cars can go. It always seems like  
6 it's an overflow. With all these places, like  
7 right now you have -- like Bloomington you have  
8 Park and Rides, Park and Gos and you can park  
9 your car, but they've always had problems with  
10 parking.

11 So what's going to happen is the  
12 residential people are basically going to be taxed  
13 somehow for the arena and they will -- to provide  
14 parking spaces. Can you hear me?

15 So they need to find some  
16 alternative for parking for these cars, because I  
17 work in Bloomington and when I went to go on  
18 light rail several times early and I couldn't  
19 even find a spot to park. You know?

20 What they'll do is they'll overflow  
21 all into the streets. So when you come home from  
22 work, you're not going to have anyplace to park.  
23 You need groceries, you'll be running all over  
24 the place.

25 I mean, you need to find some way

0039  
1 to alleviate the parking. If you have to build a  
2 no-charge ramp somewhere, but there should be a  
3 permit designed for the residential people so  
4 that they have a clear parking space. And those  
5 that need violate it, there should be signs that  
6 they will get charged.

7 Similar to what you have now on  
8 Grand Avenue. If you park in a space and you  
9 don't have a sticker on your car, you will get a  
10 ticket; because that's going to be a huge issue.

11 So it's going to be better address  
12 it now and have the funding so that you can have  
13 some off ramp parking somewhere so this can  
14 alleviate that kind of congestion because they  
15 automatically will just go right around the  
16 corner to park and go to a baseball game or  
17 whatever and it's going to cause a big problem.

18 Just people bringing their kids  
19 home from daycare won't have a place to park

8408METCouncil (3)

20 their car. I mean, you can't just drop the kid  
21 off and go running around trying to find a spot.  
22 You know?

23 Also in the winter time when it  
24 becomes darker, like I say, if you go somewhere  
25 and you come home walking around maybe 11:00

0040  
1 o'clock night, five, ten blocks away because you  
2 can't park.

3 I've heard several people say with  
4 the light rail in their community, that was a  
5 huge, huge issue. You can never park in front of  
6 your house, you can't go anywhere because you're  
7 afraid to lose your space. So you feel prisoner  
8 and that's not fair to the residents.

9 They're not saying don't have it,  
10 but just have somewhere for the congestion to go.  
11 That's pretty much my statement.

12 Is it possible for that to be a  
13 discussion where you can build a ramp around here  
14 where you can alleviate some of the parking?

15 MR. BELL: We're just taking  
16 testimony. We're not responding. We just want  
17 to hear what your thoughts are.

18 MS. BOLAK: So that's huge.  
19 Because it is also for safety issue. Like I  
20 said, I'm not interested in running around -- I'm  
21 out not interested in running around at midnight  
22 looking for parking spaces when I'm ready to go  
23 home. And you know, it's just an issue.

24 I'd rather have it addressed now  
25 than have congestion and running back and forth

0041  
1 to city council. You know, all these problems,  
2 Eyewitness News and all that stuff. You know?

3 So that's my statement and I'm  
4 sticking to it.

5 MR. BELL: Well, thank you. I  
6 appreciate your taking the time.

7 MS. BOLAK: Thank you for having  
8 me.

9 MR. BELL: That's all of the people  
10 who signed up to speak, but I'd like to offer an  
11 opportunity to anyone to address us who didn't  
12 sign up. Would anyone like to make a comment who  
13 didn't sign up?

14 If not, before I close, I want to  
15 remind folks that we are having our second public  
16 hearing this Thursday, this upcoming Thursday,  
17 August 7, 6:00 p.m. at the Brian Coyle Center in  
18 Downtown Minneapolis, and our third and final  
19 presentation or public hearing Saturday, August  
20 9, 2:00 p.m. right down the street at the  
21 Goodwill Easter Seals on Fairview Avenue.

22 With that, I will call the public  
23 hearing to a close. Thank you all for coming.

24 (Whereupon, the hearing was  
25 terminated at 12:53 p.m.)

0042  
1 STATE OF MINNESOTA. )  
2 COUNTY OF HENNEPIN ) ss.

8408METCouncil (3)

3 I, Brandi N. Bigalke, do hereby certify that  
4 the foregoing transcript of the Metropolitan  
5 Council, Light Rail Hearing, is true, correct and  
6 accurate;

7 That said transcript was prepared under my  
8 direction and control from my stenographic  
9 shorthand notes taken on the 4th day of August,  
10 2008;

11 That I am not related to any of the parties  
12 in this matter, nor am I interested in the  
13 outcome of this action.

14 Witness my hand and seal this 13th day of  
15 August, 2008.

16 \_\_\_\_\_  
17 Brandi N. Bigalke  
18  
19  
20  
21  
22  
23  
24  
25

## 8708METCouncil

0001

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

---

METROPOLITAN COUNCIL  
LIGHT RAIL HEARING  
August 7, 2008  
Brian Coyle Community Center  
Minneapolis, Minnesota

---

0002

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MR. BELL: I think we'll get started. Can folks hear me without this? Is that fine? Can you hear me okay?  
Let me call the meeting to order. I'm Peter Bell. I am chair of the MET Council. I have Peggy Leppik, another council member with me here today. This is the second of three public hearings that we're having on the Supplemental Draft Environmental Impact Statement.

This is something that is required by the FTA, the Federal Transit Administration, as a part of our preliminary engineering process and also an important component as we make our application for final design. That application will be submitted September 5th.

We take comments that will be made seriously, not just in terms of the supplemental DEIS, but also as we look at the development of what is the State's largest public works project.

We also will be accepting written and e-mailed comments up to August 25th. So if you have additional comments that you would like to make or you know someone who is not able to make tonight's meeting, but has a comment, we

0003

1  
2  
3  
4  
5  
6  
7  
8  
9  
10

welcome those comments up to August 25th.  
We have one more meeting after this and that is going to be on August 9, this Saturday at the Goodwill Easter Seals building in St. Paul on Fairview Avenue. That will be starting at 2:00 o'clock.  
So again, if you know someone who would like to make a comment or raise a concern, the last public hearing we will have will be this Saturday.

8708METCouncil

11 Before we actually get into the  
12 comments, I'm going to ask Kathy O'Brien from the  
13 staff to just provide a little bit of background  
14 information. Kathy.

15 MS. O'BRIEN: Thank you, Chair  
16 Bell. I should ask if everyone is hear me  
17 otherwise I can -- yes?

18 As Chair Bell already gave a brief  
19 overview for you, this is the purpose of the  
20 meeting tonight and it's basically an opportunity  
21 for the public to provide testimony on the  
22 Supplemental DEIS.

23 The Supplemental DEIS was a  
24 document that was just focused on changes, a  
25 limited set of key changes basically from the

0004

1 2006 Draft Environmental Impact Statement that  
2 was published. The key changes here are listed  
3 on the Power Point slide.

4 There are also some exhibits in the  
5 back of the room for those of you who maybe  
6 weren't here previously for the open house.  
7 After you've given your testimony, we'll keep  
8 them up. You can go and take a quick look at  
9 them.

10 The first element was the Hiawatha  
11 central connection right here near the Brian  
12 Coyle Center. There was a change in the  
13 alignment from the 2006 DEIS in terms of the  
14 details of how that alignment, the central  
15 corridor would come and connect to the Hiawatha  
16 train.

17 The second issue was one that got a  
18 lot of attention. That was changes proposed at  
19 the University of Minnesota East Bank Campus.  
20 Again, the Draft Environmental Impact Statement  
21 had looked at a tunnel that would run through the  
22 East Bank, and the supplemental DEIS focuses on  
23 an at grade solution on Washington Avenue.

24 The third issue was in response to  
25 numerous comments that were received during the

0005

1 2006 DEIS comment period. That was to look at  
2 the opportunity for infill stations in St. Paul.  
3 Those stations would be at Hamlin Avenue,  
4 Victoria Street and Western Avenue.

5 The Supplemental DEIS looks at the  
6 environmental impacts of constructing those  
7 stations and provides the clearance through the  
8 environmental process for those to be built at a  
9 time the funding would become available.

10 Our fourth issue was in the Capital  
11 area of St. Paul. There was a change in the  
12 alignment and a slight change in the station  
13 location that's discussed in the supplemental  
14 document.

15 Also Downtown St. Paul, a couple  
16 key changes that were going on there. One was  
17 the consolidation of two stations into one placed  
18 on the diagonal block of Fourth Street, Fifth  
19 Street, Minnesota Street in Downtown St. Paul.  
20 Then there were also some -- an alignment and a  
21 come different options in terms of getting into

8708METCouncil

22 and through Downtown St. Paul to the storage and  
23 maintenance facility. Sorry. Just people  
24 getting settled.

25 The sixth issue was traction power  
0006

1 substations. There are about 13 of those that  
2 will be placed along the line. The substations  
3 are what is used to actually power to train and  
4 the DEIS had talked about those as requirements,  
5 but really didn't provide any location for those.  
6 The Supplemental DEIS does identify  
7 general location for the placement of those  
8 substations.

9 Issue number seven is the three-car  
10 train. The supplemental DEIS looks at the -- has  
11 designs for three-car train operations, the  
12 platforms, the system elements and discloses it.

13 Issue eight was the vehicle  
14 maintenance facility as mentioned. That will be  
15 in Downtown St. Paul. Then issue nine is the  
16 Washington Avenue Bridge and improvements that  
17 would be needed to support the operation of LRT  
18 on the bridge.

19 Again, there's just a brief map  
20 here gives the geographic location of some of  
21 those nine key elements and that's also a board  
22 in the back of the room for those of you who  
23 might want to look at it.

24 Very briefly I'll talk about where  
25 we've been with the environmental process. It

0007  
1 sets a little bit of the context for the hearing  
2 tonight. In 2001, there was a scoping process.  
3 A number of different alignment alternatives were  
4 looked at as well as different modes of operating  
5 transportation services to meet the purpose and  
6 need of this project.

7 From that broad scoping document,  
8 the process narrowed down to look at just a small  
9 set of alternatives. Bus rapid transit and light  
10 rail transit operating on University and  
11 Washington Avenues.

12 After the publication of the draft  
13 Environmental Impact Statement, in June, 2006,  
14 the MET Council did select a locally-preferred  
15 alternative in that process and that is light  
16 rail transit operating on University and  
17 Washington Avenues.

18 With that locally-preferred  
19 alternative in hand, then the next major step in  
20 the process was to prepare to enter into  
21 preliminary engineering. The Council was doing  
22 that and working in partnership with the Federal  
23 Transit Administration, and that's basically the  
24 process that we've been in formally now since  
25 about 2007.

0008  
1 It was through that process of  
2 preliminary engineering that some of the options  
3 that are being talked about in the Supplemental  
4 DEIS were discovered and the need for to do this  
5 document then became apparent working with FDA.

6 Where we're going is to look for

8708METCouncil

7 some action at the close of this comment period  
8 to reaffirm the preferred alternative. Also then  
9 the next major step beyond that would be the  
10 preparation of a final Environmental Impact  
11 Statement.

12 That is currently planned to be  
13 published towards the end of this year, in late  
14 December, early January, 2009. The SDEIS will,  
15 again, affirm that preferred alternative option.  
16 It will also disclose the commitments of  
17 mitigation to the project for any impacts that  
18 we're having.

19 We'll need to look at what can be  
20 done to mitigate those impacts and those  
21 commitments will be in the final DEIS.

22 Also responses to public comments  
23 received. If you're testifying tonight for the  
24 Supplemental DEIS, a response to those comments  
25 will be included in the final DEIS.

0009

1 There may be people out here who  
2 also commented on the draft DEIS, and those will  
3 also be part of the final DEIS.

4 Then the final step in the  
5 environmental process is the record of decision.  
6 That is the FTA signing off and committing to the  
7 action. Our schedule currently has us receiving  
8 that in early 2009.

9 Someone wants in. Tell them  
10 they're welcome. Come on in.

11 The process of public comment as  
12 Chair Bell mentioned earlier, the comment period  
13 closes August 25th. So if you're testifying  
14 tonight, if you want to encourage your neighbors,  
15 community groups, sending in your testimony,  
16 that's being accepted through August 25th by  
17 e-mail, regular mail, telephone, testimony at the  
18 hearings. Again, I think all of that is  
19 summarized in a handout that's available tonight  
20 that's sitting out on the front desk.

21 Again, we had one hearing already  
22 August 4th at the Wilder Center. This is our  
23 second one. Our final one will be this Saturday  
24 at 2:00 o'clock at the Goodwill Easter Seals  
25 building. It's a Fairview and University Avenue.

0010

1 With that, Chair Bell, I think I  
2 will turn it over to you.

3 MR. BELL: Good. Thank you very  
4 much. Just a few ground rules that we have that  
5 I will review very, very quickly.

6 If you wish to speak, we would ask  
7 you to register at the desk and put a check mark  
8 in the right-hand corner, and then I will read  
9 your name and ask you -- call you when your time  
10 is to speak.

11 People will be called to speak in  
12 the order in which they appear on the sign up  
13 sheet. Each speaker we would ask that you would  
14 state your name, address and the organization  
15 that you represent, if any. Some people may be  
16 representative organization, some themselves.

17 It is important that people



8708METCouncil

18 identify themselves because this session is being  
19 transcribed. Individuals will be given three  
20 minutes if you are representing yourself. If  
21 however, you are representing a group, we're  
22 going to expand that time to five minutes.

23 Written statements, in addition to  
24 oral comments, are also accepted. So if you  
25 don't want to speak, but leave a written

0011  
1 statement, that would be accepted and appreciated as  
2 well.

3 People were asking folks to limit  
4 the scope of their discussion to the supplemental  
5 draft environmental impact statement that Kathryn  
6 reviewed.

7 So other aspects of the central  
8 corridor, of which there are many, we would ask  
9 this isn't the time and the place to comment on  
10 those, but really only those matters that pertain  
11 to the SDEIS.

12 To maximize the number of people  
13 that are given an opportunity to speak, if you  
14 address the council at a previous listening  
15 session, we would like you to wait until others  
16 who have not addressed us at a previous listening  
17 session to have an opportunity to speak before  
18 you do, but I don't anticipate that that will be  
19 a problem tonight.

20 Our first speaker is Renee  
21 Lundgren. Welcome.

22 MS. LUNDGREN: Thank you. Good  
23 evening. My name is Renee Lundgren, and I am  
24 here to speak, both on my behalf as somebody who  
25 lives two blocks off of University and Hamlin,

0012  
1 and also as a representative for MICA, the  
2 Metropolitan Interfaith Council of Affordable  
3 Housing. So I'm just sort of curious, since I'm  
4 three and five, does that mean I'm going to get  
5 eight minutes to speak?

6 MR. BELL: Wouldn't it be nice if it  
7 worked that way.

8 MS. LUNDGREN: That actually  
9 wouldn't be nice. I'm going to do this in  
10 hopefully less than three minutes.

11 Myself, as an employee of MICA,  
12 hold the value, and as does MICA, that  
13 affordable housing is one of the key things that  
14 we all need to keep in mind as we're looking at  
15 the corridors. I'm just saying that because I  
16 want to get that in there.

17 But in regards to the key things  
18 that were looked at, I would just like to say  
19 that I really believe that Western, Victoria and  
20 Hamlin should be included in the corridor.

21 And I understand that they're  
22 looking at the idea of having something set up so  
23 that after, if and when there's money available,  
24 that we could put that in there, but my concern  
25 is the fact that in Western, and Victoria in

0013  
1 particular, but also on Hamlin, those are  
2 communities that are very low income and really

8708METCouncil

3 need that access.  
4 It would be, I think, money well  
5 spent and I think something we should really be  
6 considering putting the stops on those areas.

7 Also as somebody who lives on the  
8 other side of University Avenue, we often times,  
9 my neighbors and I often time walk over to the  
10 stores and there's a lot of concern from people  
11 about what's it going to be like?

12 Because right now it's already  
13 difficult to cross University Avenue, and with  
14 the light rail coming through and with all the  
15 stops that there are there, there's a lot of  
16 concern around how are we going to cross  
17 University with the light rail there when it's  
18 difficult now?

19 So thank you. That's just what I  
20 wanted to say.

21 MR. BELL: Good. Thank you so  
22 much. Before we continue, I'd like to introduce  
23 another colleague of mine on the MET Council,  
24 Christine Sersland Beach to my right. Actually,  
25 she represents the district that encompasses a

0014  
1 great deal of the central corridor. So welcome.

2 The other point I neglected to add  
3 is that we're not going to be dialoging with  
4 presenters. So we're only to be receiving  
5 testimony, but not really responding.

6 The next speaker is Jerry...

7 MR. KETTUNEN: Kettunen.

8 MR. BELL: Say that again.

9 MR. KETTUNEN: Kettunen. You just  
10 have to pronounce all the letters.

11 MR. BELL: You did it very well.

12 MR. KETTUNEN: My name is Jerry  
13 Kettunen. I live in St. Paul and I use the light  
14 rail often -- or not the light rail -- the bus  
15 service on University Avenue.

16 In the literature you said the  
17 light rail was going to go from end to end in  
18 about 39.6 minutes. If you do some basic math,  
19 which somebody said it's very complicated, it's  
20 eight minutes per the MPC to go from the  
21 Warehouse District Station to the Downtown East  
22 Metro Station. Taken eight minutes for that.

23 Then after that you've got 15 stops  
24 which take around 30 seconds and I've seen some  
25 as long as 52 seconds. So that would add about

0015  
1 another 8 minutes.

2 And you've got about another 9.9  
3 miles at 15 miles an hour and the Hiawatha line  
4 has a 15 miles an hour speed limits on South  
5 Fifth Street.

6 Adding that up, you get 55.6  
7 minutes and that doesn't include any acceleration  
8 time. That includes minimum times for stops.

9 So unless you're violating the laws  
10 of physics, this light rail will be significantly  
11 slower. The only thing that -- between the 94  
12 will be much faster, the 50 faster and the number  
13 16 bus which makes a lot more stops and is much

8708METCouncil

14 more convenient for people living on University  
15 Avenue, it will beat the number 16 some of the  
16 times if you look at using key times.  
17 So I think -- I have for about five  
18 months been sending e-mails trying to see how  
19 the physics are going to work. This isn't rocket  
20 science. I've got a Sixth Grader that can follow  
21 most of this, and I'm assuming maybe the light  
22 rail can find somebody at least that smart.  
23 And I don't understand -- and the  
24 real issue is why is Hiawatha successful?  
25 Because it has limited access rights of way --

0016

1 MR. BELL: You have about a minute  
2 left.

3 MR. KETTUNEN: Where it can go 45,  
4 55 miles an hour. Yet on Fifth Street, they're  
5 15 miles an hour, and University Avenue and  
6 Washington Avenue we know are at least as busy as  
7 Fifth Street and Minneapolis.

8 So somewhere I would like somebody  
9 to explain the physics because the people on  
10 University Avenue are going to be darn  
11 disappointed when they get on that thing and say,  
12 "Gee, where is my number 16 bus?"

13 Thank you.

14 MR. BELL: Thank you for your  
15 comments. Paul White is our next speaker.

16 Mr. White, welcome. Welcome.

17 MR. WHITE: Thank you. My name is  
18 Paul White. I live in Southeast Minneapolis.  
19 I'm very excited about the light rail. I think  
20 it's fantastic, but with regard to this  
21 Supplemental Draft Environmental Impact Study,  
22 main concern is how have -- as I look through the  
23 document it refers to removal of cars from  
24 Washington Avenue pedestrian mall, and being that  
25 we live right next to that mall, proposed mall,

0017

1 we wonder if those cars are going to then appear  
2 on our streets.

3 And I guess the question is how  
4 does this study look at the surrounding  
5 neighborhoods or does it at all, as far as the  
6 impact of pushing cars or removing them from  
7 Washington Avenue? I may have missed it. I very  
8 quickly went through it, but that's the primary  
9 concern.

10 As you know, there was the -- the  
11 University appeared to be focused on using a  
12 railroad trench that would not have had to remove  
13 cars from Washington Avenue, and you know, we  
14 scratching our heads in the neighborhood at the  
15 University why, what seems like a logical  
16 solution like that was not included in parallel  
17 for comparison and study.

18 So primary concern is on the cars  
19 that are displaced, and if this study or if other  
20 studies will look at how those cars will -- where  
21 they will wind up and how that will impact the  
22 communities around Washington Avenue and  
23 University. Thank you.

24 MR. BELL: Thanks for your comment.

8708METCouncil

25 Tim Mungavan.

0018

1 MR. MUNGAVAN: Mungavan.  
2 MR. BELL: Mungavan. Welcome.  
3 MR. MUNGAVAN: Thank you. As I  
4 say, my name is Tim Mungavan. I work at West  
5 Bank Community Development Corporation which is a  
6 nonprofit development corporation serving the  
7 Cedar/Riverside neighborhood and we're very  
8 interested in the light rail, the central  
9 corridor light rail. We think it will be a great  
10 boom to this neighborhood and we have been  
11 involved in working with MET Council in an  
12 earlier phase trying to ensure that the station  
13 on the West Bank connects with Cedar Avenue and  
14 we're happy it has now. The design now does  
15 connect to Cedar Avenue. We think it's a good  
16 thing and it will be very beneficial to the  
17 neighborhood over the long haul.

18 We interested -- the Cedar  
19 Riverside is a growing community of color with a  
20 high concentration of new Americans, both  
21 residents and businesses, and the light rail is  
22 likely to serve both businesses and residents in  
23 the future.

24 And what we feel is an opportunity  
25 here is to have development around the light rail

0019

1 station that will help everyone in the  
2 neighborhood prosper, help the neighborhood  
3 preserve its international character.

4 But to do that, we feel that the  
5 development needs to be smart in nature. It has  
6 to take advantage of good advantage of some of  
7 the opportunities that are brought to us though  
8 this -- the change in character of what we call  
9 the Washington Avenue trench, which is a very  
10 underutilized land that could be better utilized  
11 for development.

12 But we also oppose the new  
13 alignment connection between the central corridor  
14 and the Hiawatha line because it is -- it's  
15 routed right through a potential very useful,  
16 developable parcel, that if it were part of the  
17 future development around the station would  
18 provide a lot more benefit to the community and  
19 to the City and to the line in general.

20 So in combination with the present  
21 design which shows the diamond intersection at  
22 Cedar and Washington continuing to be in place,  
23 which is a big waste of land we think. This new  
24 connection to the Hiawatha corridor is also not a  
25 wise use of land. We oppose the use of that.

0020

1 So that's all I have. Thanks.

2 MR. BELL: I appreciate you taking  
3 time to provide some testimony.

4 That is all the people that we have  
5 signed up. However, I would like to provide an  
6 opportunity for anyone else in the audience who  
7 would like to have their comments included in the  
8 record to come forward. Would anyone else like  
9 to speak tonight?

8708METCouncil

10 All right. Then I will remind you  
 11 that we also accept written comments. Those  
 12 written comments need to be submitted by August  
 13 25th and our final public hearing will be this  
 14 Saturday, 2:00 o'clock at the Goodwill Easter  
 15 Seal Building on Fairview Avenue in St. Paul.  
 16 With that I'll call the meeting to  
 17 a close. Thank you all for coming down.  
 18 (Whereupon, the hearing was  
 terminated at 6:27 p.m.)

19  
 20  
 21  
 22  
 23  
 24  
 25  
 0021

1 STATE OF MINNESOTA )  
 2 COUNTY OF HENNEPIN ) ss.  
 3 I, Brandi N. Bigalke, do hereby certify that  
 4 the foregoing transcript of the Metropolitan  
 Council, Light Rail Hearing, is true, correct and  
 accurate;

5  
 6 That said transcript was prepared under my  
 direction and control from my stenographic  
 7 shorthand notes taken on the 7th day of August,  
 2008;

8  
 9 That I am not related to any of the parties  
 in this matter, nor am I interested in the  
 10 outcome of this action.

11  
 12 Witness my hand and seal this 13th day of  
 August, 2008.

13  
 14  
 15  
 \_\_\_\_\_  
 Brandi N. Bigalke

16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Aug9-Li ghtra i

0001

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

METROPOLITAN COUNCIL  
LIGHT RAIL HEARING  
AUGUST 9, 2008  
ST. PAUL, MN

0002

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## P R O C E E D I N G S

Whereupon, the hearing was commenced at 2:04 p.m.  
as follows:

CHAIRMAN BELL: Can everyone hear me  
okay?

THE AUDIENCE: No.

CHAIRMAN BELL: Can everyone hear me  
now? Thank you. I want to welcome everyone to the  
third of our public hearings on the Central Corridor  
SDEIS. This is the process where we ask people from  
the community to raise any issues on the Supplementary  
Draft Environmental Impact Statement that we will be  
submitting September 5th. This is a part of the  
process with the Federal Transit Administration.  
Right now, we're in preliminary engineering, and we  
will be making our application for what is known as  
final decision. That process hopefully, we will be  
allowed into in February or March of 2009. We will be  
in that stage of development of the project for about  
a year, at the end of which we will make another  
application to the Federal Transit Administration for  
a full funding grant agreement, whereby the Feds will  
pay 50 percent of the cost of constructing the line.

Now, let me introduce the folks at the

0003

1  
2  
3  
4  
5  
6  
7  
8  
9  
10

table here. Georgeanne Hilker is to my left. She's a  
member of the Met Council. Kirstin Sersland Beach is  
also a member of the Metropolitan Council, and her  
district encompasses much of the central corridor. My  
name is Peter Bell; I'm chair of the Met Council.  
Shoua Lee is to my immediate right, and she works on  
the staff of the Central Corridor Team. And Kathy  
O'Brien to my far right also works on the staff of the  
Central Corridor Project office.

Before we hear testimony today, I'm

Aug9-Lightrail

11 going to ask Kathryn O'Brien to do a bit of an  
12 overview of what's in the SDEIS, and then we will hear  
13 testimony from persons that want to comment on that  
14 process. Katherine?

15 MS. O'BRIEN: Thank you, Chair Bell.  
16 Can everyone hear me? Good. Just a very quick  
17 introduction to set the stage for what the  
18 supplemental DEIS is and what its purpose is and the  
19 overall project process, and then I will move on very  
20 quickly to give you a little bit of an overview of  
21 where we've been in the environmental process, where  
22 we're going to be going over the next few months, and  
23 hopefully do all of this and give plenty of time for  
24 you to testify today.

25 The supplemental DEIS was really a  
0004  
1 focused document. It was focused on nine key changes  
2 from what had been proposed in the 2006 Draft  
3 Environmental Impact Statement. Those key changes are  
4 there on the screen, but the first was that that  
5 Hiawatha central connection over on the U of M -- near  
6 the U of M's West Bank campus, there were some changes  
7 that were contemplated in terms of how the train would  
8 connect to the existing Hiawatha Light Rail train.

9 The second issue that got a lot of  
10 attention in the press, I know, locally was the -- the  
11 decision to take a look at an alternate arrangement of  
12 the LRT through the University of Minnesota's West  
13 Bank campus. We're now proposing a solution that  
14 would run at grade on Washington Avenue through the  
15 East Bank campus and turning a portion of that into a  
16 transit/pedestrian mall.

17 The third change was a result of many  
18 comments that were received during the 2006 Draft  
19 Environmental Impact Statement comment period, and  
20 that was to look at building three additional stations  
21 in St. Paul on Hamline Avenue, Victoria Street, and  
22 Western Avenue.

23 The fourth is changes that were  
24 proposed in the Capitol area of St. Paul. The shift  
25 in the station location from -- at the Capitol station

0005  
1 and also change in the alignment of the LRT.  
2 Sixth issue was looking at traction  
3 power substations and locations for those to be placed  
4 along the line. There were 13 traction power  
5 substations, and the supplemental DEIS gives  
6 information on the general location for those pieces  
7 of equipment.

8 And I see missed one, No. 5. No. 5 is  
9 the downtown St. Paul alignment and station locations.  
10 There were several changes contemplated in that net  
11 alignment, that portion of the alignment, the  
12 consolidation of two stations into one station placed  
13 on the diagonal block at 5th and 4th Streets in  
14 downtown St. Paul and also changes in the alignment.

15 The seventh issue was looking at the  
16 three-car train requirement. It was looking at the  
17 impact of building these stations out to accommodate  
18 the three-car trains at some point in the future when  
19 they'll be required, and also other elements that  
20 would be required for those operations.

21 The eighth issue was the vehicle

## Aug9-Lightrail

22 maintenance facility that had been talked about in  
23 very general terms in the 2006 DEIS. The supplemental  
24 DEIS gives a very specific location for that facility  
25 in downtown St. Paul, just a little bit east of the

0006

1 Union Depot Station, and other elements that would be  
2 required for that vehicle maintenance facility.

3 And then the ninth issue is Washington  
4 Avenue bridge and improvements to that to facilitate  
5 the LRT operations.

6 And there's just a map here that gives  
7 some information in terms of where these elements are  
8 located geographically along the corridor. That map  
9 and some other information is actually set up just  
10 outside the room here, and for those of you who might  
11 not have come in before the hearing started, if you  
12 would like to take a quick look at that after you're  
13 done testifying, that will be left up for you to take  
14 a look at.

15 The environment process, where we've  
16 been has been a series of many years in different  
17 studies. But most recently, in 2001, it began with a  
18 look at a number of different alternatives and  
19 different ways and modes of transit that meet the  
20 needs of the central corridor. From that  
21 broad-scoping document, there were just a few  
22 alternatives that were selected for analysis in the  
23 Draft Environment Impact Statement that included bus  
24 transit and light rail transit operating on University  
25 and Washington Avenues. Through that process of the

0007

1 publication and review of the Draft Environmental  
2 Impact Statement, the Met Council selected, in June of  
3 2006, they selected light rail transit as the  
4 preferred alternative, and so that is what we've been  
5 looking at ever since that time in 2006.

6 Between 2006 and 2007, there was a  
7 period where we were applying to the Federal Transit  
8 Administration to formally enter preliminary  
9 engineering, and that is where we're at at this point  
10 in time. Through the process of preliminary  
11 engineering and through the process of looking at  
12 public comments that were received on the 2006 DEIS,  
13 the FTA has said, you know, some of these changes that  
14 you're thinking about, they would have the potential  
15 for significant impacts, and we were directed by the  
16 FTA, basically, to do the supplemental draft  
17 environmental impact statements that we're going to be  
18 discussing today.

19 Then, finally, after the DEIS is  
20 published, there will be the process of putting  
21 together the final environmental impact statement.  
22 The purpose of that document is to look at the final  
23 preferred alternative, also to look at commitments to  
24 mitigation for any impacts that that alternative will  
25 cause, and then also to respond to public comments.

0008

1 So the comments received at the hearing this  
2 afternoon, those will be responded to in the final EIS  
3 document.

4 And then the final step in the process  
5 is really to get to a record of decision, which the  
6 Federal Transit Administration would sign. The



Aug9-Lightrail

7 schedule now has us receiving that in early 2009.  
8 Once that record of decision is received, then we  
9 would enter into the full-funding grant agreement and  
10 enter final design and eventually enter into  
11 construction on the project.

12 The public comment period will close  
13 August 25th. Your comments are being received at  
14 public hearings. The third hearing is one we're  
15 having this afternoon. There's also the opportunity  
16 to comment via e-mail, also to comment by writing to  
17 myself as a point (inaudible) project (inaudible), and  
18 also by telephone. We have a telephone hotline set  
19 up, as well.

20 As I mentioned, this is the third  
21 public hearing. We've had two already this week and  
22 this caps our final hearing for that process.

23 And with that, Chair Bell, I will turn  
24 it over to you as you wanted to go over the ground  
25 rules.

0009

1 CHAIRMAN BELL: Thank you very much,  
2 Kathryn. There are a few simple rules of the road  
3 regarding this session today; the first of which is:  
4 People wishing to speak, we would kindly ask you to  
5 sign up at the desk to my right, to your left. People  
6 will be called to speak in the order in which they  
7 appear on the sign-in sheet. And I beg your  
8 indulgence now if I pronounce your name wrong. Each  
9 speaker should state his or her name, address, and the  
10 organization they represent, if any.

11 It is important that people identify  
12 themselves because we, of course, are transcribing  
13 this session. Individuals will be given three minutes  
14 if they are only representing themselves. If,  
15 however, they are representing a group, they will be  
16 given five minutes to present. Written statements, in  
17 addition to oral comments, are also very much welcome  
18 and accepted. And as stated earlier, the deadline for  
19 those written comments is August 25th.

20 We would request that you limit the  
21 scope of your contents -- of your comments to the  
22 supplemental draft environmental impact statement; in  
23 other words, those nine points that Kathryn went  
24 through. There are many additional questions and  
25 concerns and comments that people may have about the

0010

1 central corridor line, but for this process and this  
2 hearing, we would kindly ask you to, if you could,  
3 limit your comments to those nine points.

4 To maximize the number of people that  
5 are given an opportunity to speak, those individuals  
6 that have addressed the Council at one of the previous  
7 listening sessions, we would ask that you wait to make  
8 your comments until people who have not had that  
9 opportunity can speak; though I don't anticipate a  
10 problem with that because we don't have that many  
11 people requesting to make a comment.

12 And the final and very important point  
13 is we're not going to be responding to your comments.  
14 We are just going to be listening to them. I would  
15 ask you to kindly refrain from asking us questions or  
16 attempting to engage us in dialogue, because the  
17 session will become too long and protracted. We are

Aug9-Lightrail

18 only going to be receiving and hearing your comments.

19 And with that, our first speaker is

20 Terry Henry. Welcome.

21 MR. HENRY: Thank you. My name is Dr.

22 Terry Henry. My wife and I live at 406 Wacouta

23 Street, Unit 208, downtown St. Paul, 55101, Lowertown.

24 I represent myself.

25 AUDIENCE MEMBER: We can't hear you.

0011

1 MR. HENRY: Can you hear me now? I'll

2 repeat it. My name is Dr. Terry Henry. My wife and I

3 live at 406 Wacouta Street, River Park Lofts, Unit

4 208, downtown St. Paul, Minnesota, 55101. We are

5 representing no one except ourselves; however, we are

6 members of the Central Presbyterian Church. I'm on

7 the board of elders, which is the governing board of

8 the church; however, I cannot speak for the church

9 because the session has not (inaudible), so I'm only

10 speaking for our concern. We're speaking because of

11 the -- we had a show -- we went to a viewing of the

12 light rail last Sunday, so that's where a revelation

13 occurred. I just want to bring some issues to you

14 which the supplemental DEIS really does not cover. In

15 summary -- in general, the publication covers churches

16 more as artifacts, historical buildings, pretty

17 buildings, historic -- vibration concern, a little lip

18 service for weddings and funerals, nothing that the

19 church as a place of business and the service of

20 people, the service of God.

21 I'll read off what I see as happening

22 to Central Presbyterian Church and see what you say.

23 The tracks -- we're concerned about the tracks on

24 Cedar Street that cover -- that abut against Central

25 Presbyterian Church in downtown St. Paul, 500 Cedar

0012

1 Street -- Cedar Avenue, I guess it's called, in St.

2 Paul. Tracks are right -- go next to the church

3 property 28 feet from the front door of the church.

4 In our opinion, my wife's and my opinion, the tracks

5 effectively block the church's only access to a public

6 street. Central Presbyterian Church is hemmed in on

7 all other sides by private property. We can use it

8 only at the behest at -- or they can change their mind

9 in a flash.

10 The arriving trains, as we understand

11 it, between 7 and 10 minutes, block the only loading

12 zone of the church. We understand there's supposed to

13 be some mitigation (inaudible) have not been satisfied

14 with what I've heard so far. Driving change crossing

15 the intersections of Exchange and Cedar Streets in the

16 vicinity of the church must announce such arrivals by

17 the authorized gong, gong, gong. Since trains are the

18 only -- the train going 28 feet from the door of the

19 church, the noise will not be mitigated by distance,

20 and in the summertime, the church leaves the sanctuary

21 open due -- because we don't have air conditioning.

22 The research documents do not pertain

23 to the LRT -- do not acknowledge all churches,

24 including Central Presbyterian Church, that the church

25 operates business daily, 7 days a week, all day into

0013

1 the evening and sometimes overnight. It's not --

2 CHAIRMAN BELL: You've got a minute

Aug9-Li ghtra i l

3 l e f t .

4 MR. HENRY: All right. I'll talk  
5 (i n a u d i b l e). Churches include religious service,  
6 education classes, counseling, social services,  
7 assistance to the elderly, homeless -- housing for  
8 homeless. We have rummage sales, music performances,  
9 luncheons, pizza socials, facility like A.A. This LRT  
10 will discriminate against the elderly because there's  
11 no way for them to get into the only authorized ADA  
12 ramp in the church. We would have to redo the new  
13 ramp someplace else. There is no way for the church  
14 to have a -- where are they going to put its dumpster  
15 because that's the only place we have for the  
16 dumpster. Weddings are screwed up because of the  
17 church. The funerals are messed up because of the  
18 arrival trains, and there's no way for the persons to  
19 get the caskets properly into the church in proper  
20 digni ty.

21 CHAIRMAN BELL: Mr. Henry, your time is  
22 up.

23 MR. HENRY: Thank you.

24 CHAIRMAN BELL: I appreciate you coming  
25 in.

0014

1 MR. HENRY: I'll write you a nice long  
2 letter.

3 CHAIRMAN BELL: The next speaker is  
4 Leslie Davis. Mr. Davis, welcome.

5 MR. DAVIS: Thank you. My name is  
6 Leslie Davis. I represent (i n a u d i b l e) Environmental  
7 Group. Address is Post Office Box 1168, Minneapolis,  
8 55402. And my address is 622 Lowry, where I live with  
9 my cat; I speak for me and my cat today under your  
10 (i n a u d i b l e). I testified or provided a letter to the  
11 Met Council probably four, five, or six years ago  
12 questioning if car rail was going to be proposed,  
13 suggesting that it go up along Pierce Butler Road or  
14 along existing railroad tracks, so I'll make that part  
15 of my comments today by reference that I am in play in  
16 this issue because I am on the record doing that.

17 You know, when government gets a bad  
18 idea, first thing they do is they plant a little seed  
19 of it and then they take a little money and throw it  
20 at it and then they go and chase that money with a  
21 whole bunch of more money and we wind up with the  
22 project which exists today, a project that we can't  
23 afford. The State of Minnesota is billions -- I have  
24 a record that shows we were \$28 billion, with a B, in  
25 debt. The federal government is trillions of dollars

0015

1 in debt. A trillion dollars is a thousand billion;  
2 think about that. Thousands of billions of dollars in  
3 debt with no hope of paying it because we keep  
4 creating money and interest out of thin air, and we're  
5 going to pay for a project and we're all thrilled  
6 because union workers will go to work and the federal  
7 government is going to pay for it, but with whose  
8 money? The future's money that's going to be created  
9 out of thin air.

10 So I'm going to give four points today:  
11 That we can't afford this project because of what I  
12 just mentioned about the money. It's not needed  
13 because this corridor is the most efficient one for

Aug9-Lightrail

14 transportation. Jamming rail trains onto the  
15 Washington bridge and onto Washington Avenue, it just  
16 doesn't make sense. If this is your state and you had  
17 the power and you were king, you wouldn't put in a  
18 project like this when you look down on it. It's just  
19 outrageous.

20 It's -- now, the central lines, this  
21 whole thing by allowing this corridor to run into the  
22 light rail, you see -- put yourself vulnerable to  
23 disruption. What if something were to happen downtown  
24 Minneapolis that might knock out the tracks or  
25 something? Then you got a whole transportation system

0016

1 to the University, to Minneapolis/St. Paul, the  
2 airport, the Mall of America knocked out. You'd be  
3 too vulnerable because of centralizing it. In this  
4 day and age where terrorism is the key word,  
5 centralization is really not a good idea.

6 And fourth point I'll make is the  
7 environment. I see no examination of the electricity  
8 effects from this operation; either riding the trains,  
9 standing on the platforms. I mean, stray voltage is a  
10 serious problem. The farmers have spoken up numerous  
11 times in numerous places. There's voluminous amounts  
12 of records about stray voltage from electricity. With  
13 computers and all the things in the cars, you think --  
14 you need to examine that in this environment review.  
15 And also, environment protects us against noise,  
16 disruption. It doesn't have to be noise that exceeds  
17 certain decibel levels, but if you're going to hear  
18 those bells on University ding, ding, ding all night  
19 until two a.m., I don't know if the people are going  
20 to stand for it. What we're going to do, if we can  
21 find public support for it, we're going to sue to stop  
22 the project if we can mobilize enough people to do it  
23 because I'm convinced that's all that's going to stop  
24 it.

25 Thank you for your courtesy and the

0017

1 opportunity to testify, and you all have a good  
2 weekend.

3 CHAIRMAN BELL: Mr. Davis, thank you  
4 for your comments. The next presenter is Irwin  
5 Wintervold. Erin, I'm sorry.

6 MS. WINTERVOLD: Hi. I'm Erin  
7 Wintervold. I'm also (inaudible).

8 THE COURT REPORTER: Can you speak into  
9 the microphone?

10 MS. WINTERVOLD: Can you hear me now?  
11 I'm also a (inaudible) MICAH. As a youth, I am part  
12 of the primary group of consumers (inaudible) in the  
13 Twin Cities, and today, I'm going to talk about some  
14 of my concerns about the central corridor and the  
15 effects on the area, particularly on the small  
16 businesses along University and the residences in the  
17 surrounding communities. As part of the (inaudible)  
18 this project, their concerns should really be  
19 (inaudible) fully addressed for this project to be  
20 successful, and the current plans that you have have  
21 very little that's a benefit to them, which I just  
22 don't see how that's justified at all.

23 So one of the biggest issues right now,  
24 obviously, is the parking. It's something that really

Aug9-Lightrail

25 does impact the whole area, because if 80 percent of  
0018

1 University Avenue's on-street parking is eliminated,  
2 No. 1, where do people park as they're getting on the  
3 light rail stops, and No. 2, what happens to the small  
4 businesses without parking lots who depend on the  
5 availability of street parking for their customers?  
6 And so, clearly, there needs to be some kind of  
7 compensation or mitigation for this because it's going  
8 to hurt small businesses as well as the community if  
9 parking starts to overflow into residential streets.  
10 I think it would be best not to choose an alternative,  
11 such as a parking permit, which will force the  
12 community to pay for a problem caused by a development  
13 that many of them don't want.

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

25 One of the most serious problems I can  
0019

1 see happening with the construction of a light rail  
2 line in the central corridor is the impact of  
3 gentrification in both the residential and commercial  
4 areas. I know this certainly isn't an issue that's  
5 going to be avoided or easily fixed. It's something  
6 that really needs to be considered seriously and  
7 thoroughly investigated if the project intends to  
8 fulfill its objective of sustaining and preserving the  
9 neighborhoods of the corridor.

10 Rising property values due to the  
11 presence of the light rail are going to put huge  
12 pressure on the residents in the area as well as the  
13 local small businesses that manage to stay open  
14 through the construction. The project plans need to  
15 have clear commitments to invest in supporting and  
16 preserving the existing community. This includes the  
17 neighborhood residents and the small businesses that  
18 define the character and the identity of the area and  
19 reflect the diversity of the community. That's all.

20 CHAIRMAN BELL: Thank you very much. I  
21 appreciate your coming down. Scott Halstead.  
22 Welcome.

23 MR. HALSTEAD: Greetings on a sunny  
24 day. Scott Halstead, 3271 Woodbridge Street,  
25 Shoreview. I'll start out by saying the population of

0020  
1 St. Paul has declined from 2004 to 2006; that's  
2 according to the U.S. Census, City of St. Paul, State  
3 of Minnesota. Ramsey County's population has declined  
4 over the same period of time. Employment in  
5 Minneapolis and St. Paul has declined over the same  
6 period of time. Traffic, according to the SDEIS, is  
7 actually down on the main central corridor streets.  
8 There's a real question of the projections for 2030  
9 may be very inaccurate. Bus schedules; I went back

Aug9-Lightrail

10 and looked at the DEIS, I got copies of the schedules  
11 that were mostly used for calculating the DEIS. Those  
12 average times are less than the DEIS. I calculated  
13 using current schedule times; they're still less.  
14 Projections of bus times for 2030 are not very likely  
15 (inaudible).

16 Financial assets of this project are  
17 just terrible. In contracting for architect,  
18 engineering services, construction in the last 20  
19 years of the federal government building \$415 million  
20 was an infrastructure, it paid \$169 million, I  
21 believe -- \$163 million for professional services; 39  
22 percent. That is just ridiculous. We're paying for  
23 paperwork. The operating costs, projected to reduce  
24 now to \$60 million down to almost \$54 million;  
25 calculated that with three percent inflation, in 2030,

0021

1 that's \$106 million. How much new revenue is this  
2 line going to bring in? I calculated around \$10, \$12  
3 million.

4 CHAIRMAN BELL: Mr. Halstead, if I can  
5 ask you to wrap up, your time is drawing to a close.

6 MR. HALSTEAD: That is a tremendous  
7 amount, and that means the taxpayers subsidizing this,  
8 approximately 85 percent; that is a lot of money.

9 CHAIRMAN BELL: Thank you for coming  
10 down. Our next presenter is Carol Swensen. Welcome.

11 MS. SWENSEN: Thank you. We have  
12 spoken before. Do you want to me to defer to the  
13 other people behind me?

14 CHAIRMAN BELL: You know, why don't you  
15 -- you're here and we don't have that many more people  
16 who have requested to -- I see. Our court reporter  
17 has also asked if you'd be kind enough to speak right  
18 into the microphone because we are transcribing this.  
19 Why don't you go ahead?

20 MS. SWENSEN: Okay. My remarks are  
21 very brief. My name is Carol Swensen. I'm the  
22 community liaison for the District Council  
23 Collaborative of St. Paul and Minneapolis. DCC is an  
24 organization of 15 neighborhood associations and  
25 district councils in Minneapolis and St. Paul that are

0022

1 in or along or nearby the central corridor. Our  
2 office is at 1080 University Avenue West in St. Paul.

3 On behalf of the DCC, I would like to  
4 thank you for the opportunity to comment on the SDEIS.  
5 I would like to state that the DDC supports  
6 construction of light rail in the central corridor.  
7 The DDC will be submitting written comments that touch  
8 on a number of the key elements in the SDEIS. This  
9 afternoon, I will focus our brief remarks on stations  
10 at Western and Victoria and Hamline. While this is  
11 not new ground for the DCC, it is important ground,  
12 and an issue that remains unresolved. The SDEIS  
13 asserts that, because the central corridor as a whole  
14 has a greater percentage of low-income and minority  
15 persons than counties in which it is located, there  
16 aren't any adverse impacts that are borne unequally  
17 throughout the corridor, and it also asserts that any  
18 benefits will be shared equally. Consequently, SDEIS  
19 concludes that no official mitigation measures are  
20 needed. The DCC disagrees and contends that issues of

Aug9-Lightrail

21 transportation equity for environmental justice  
22 neighborhoods have not been adequately addressed.

23 With no stations at Western, Victoria,  
24 and Hamline, reduced number 16 bus service, and no  
25 special mitigation measures, disproportionately high

0023

1 impacts on residents and businesses between Snelling  
2 and Rice would not be avoided, minimized, or  
3 mitigated, and receipt of benefits by minority and  
4 low-income populations would be reduced and  
5 significantly delayed. We respectfully ask that the  
6 SDEIS address environmental justice in greater detail  
7 and give full consideration to arrange mitigation  
8 measures, including build-out of all three stations.  
9 Thank you.

10 CHAIRMAN BELL: Thank you very much for  
11 your comments. And the next presenter is Marlee  
12 Leebri ck-Stryker.

13 MS. LEEBRICK-STRYKER: Chairman Bell,  
14 members of the Metropolitan Council, and community  
15 members, my name is Marlee Leebri ck-Stryker, and I'm a  
16 youth (inaudible) at the Metropolitan Interfaith  
17 Council on Affordable Housing, also known as MICAH.  
18 It is important to us that (inaudible) project benefit  
19 the communities it runs through. The communities on  
20 the eastern edge of this route need the station stops  
21 on Western, Victoria, and Hamline, with first  
22 preference to Western and Victoria. The businesses  
23 along the route will need mitigation to stay open and  
24 not be displaced during construction, particularly  
25 with parking cuts. The neighborhoods along the route

0024

1 will need protection from tax increases related to  
2 increased land value. Neighbors will need to move  
3 across University freely and not have (inaudible).  
4 The local bus service needs to continue. We feel that  
5 social effects, environmental justice, economic and  
6 developmental effects are not being taken into  
7 account. Thank you for your time and consideration.

8 CHAIRMAN BELL: Thank you for your  
9 comments. The next presenter is T. Mychael Rambo, my  
10 favorite entertainer in the whole Twin Cities.

11 MR. RAMBO: That's trouble now. Mr.  
12 Bell, members of the council, it's very good to be  
13 here and I will not be performing. I am a resident in  
14 St. Paul at 871 Aurora Avenue. My name is T. Mychael  
15 Rambo, and I'm here today only echoing what you  
16 already heard. And it's very clear that the two young  
17 ladies who spoke before me have expressed deep  
18 concerns about gentrification and the impact on how  
19 the central corridor is being affected. Being a  
20 resident near Victoria and University, it's very  
21 clear. My grandmother said that if the mountain is  
22 smooth, you couldn't climb it, and it's powerful to  
23 think about. We understand it's going to be  
24 challenging and we understand that there are going to  
25 be levels of give and take, but we feel, as members of

0025

1 this community, we have lost far more than we're  
2 gaining. At this particular watch, when we look at  
3 the members of my community that live along that  
4 corridor -- seniors, elders, those who have physical  
5 restrictions who do not have access to economic

Aug9-Li ghtra I

6 advantages of businesses located at Hamline stops, the  
7 impact of smaller businesses, what are we going to do  
8 about parking -- those concerns have to be addressed.  
9 Living on Aurora Avenue, I'm very much aware of how  
10 parking will be shifted to the block where I live;  
11 how, right now, we already have concern about traffic,  
12 trash, and people use our streets as kind of a  
13 pass-through, if you will.

14 There's also something that's very  
15 important: Because I moved here from Texas where I-35  
16 eradicated the black community in Austin. Where Rondo  
17 was erased by I-94 and the community which is now the  
18 central corridor is the reflection of what Rondo once  
19 was and, yet again, we're looking at the same sort of  
20 potential for businesses and the gentrification to, in  
21 effect, impact what that community looks like. And  
22 the importance of keeping that cultural diversity  
23 present and having the young people that I work with,  
24 whether it be at Central High School or as a professor  
25 at the University of Minnesota, having access to all

0026

1 benefits of being a member of this community, being  
2 able to give back and feel like their voices and who  
3 they are counts and matters. And that's one of the  
4 things that I think is of great importance that yours  
5 -- your vision and your willingness to support the  
6 need of this community is going to be something that  
7 is going to (inaudible) young people truly believe  
8 that they count and that they matter when you think of  
9 their concerns of being important. And making these  
10 choices is going to be very valuable, not only to them  
11 but to all of us as a whole.

12 One of the final concerns that I have  
13 is just the fracturing. One of the things that the  
14 Council talks about is building community,  
15 connectivity, and accessibility, and I'm wondering how  
16 strong this project will continue to build community  
17 when the community is being somewhat torn apart and  
18 fractured so tremendously by the impact of not having  
19 those stops, the potential businesses being shut down,  
20 parking, and the potential for homeowners and others  
21 who are struggling just to keep ends meeting being  
22 able to remain in the community.

23 Those are some of my concerns. And so  
24 many others said this eloquently, but I wanted to say  
25 something that lets it be known that we care, and

0027

1 thank you for caring enough to help us through this  
2 process.

3 CHAIRMAN BELL: Thank you for coming  
4 down and presenting today. The next presenter is Ken  
5 Smith representing District Energy. Mr. Smith.

6 MR. SMITH: Thanks, Chair Bell. Ken  
7 Smith with District Energy, 76 Kellogg Boulevard West  
8 in St. Paul. I'm pleased to make a statement  
9 concerning the Supplemental Draft Environment Impact  
10 Statement for the central corridor LRT project. We  
11 applaud the efforts that have been made to continue to  
12 move this vital project forward.

13 THE COURT REPORTER: Can you speak into  
14 the microphone?

15 MR. SMITH: Speak louder, okay.

16 CHAIRMAN BELL: Well, into the



Aug9-Li ghtra i

17 microphone.

18 MR. SMITH: Okay. We applaud the  
19 efforts that have been made to move this vital project  
20 forward and we remain steadfastly supportive of the  
21 project. However, the serious concerns we have raised  
22 about the impacts this project will have on our piping  
23 systems and the heavy impact on our customers remains  
24 understated. While the SDEIS does a better job of  
25 documenting those impacts than the draft EIS, it

0028

1 seriously understates the extent of the impact. For  
2 example, (inaudible) concerning routing changes at the  
3 Capitol that, and I quote, District Energy's large  
4 heating and cooling pipelines would likely be affected  
5 without substantial, unquote. In fact, the impact is  
6 very substantial, and concerns about this impact were  
7 raised with the project office before the SDEIS was  
8 completed. It also does not accurately document the  
9 depth of our systems. This was also provided. Some  
10 of the routing adjustments in the SDEIS have reduced  
11 the impact on District Energy, whose lines lie at 4th  
12 and Cedar, mitigating impacts on two very congested  
13 blocks. However, other changes, such as those by the  
14 Capitol, have more than offset the savings that have  
15 been achieved.

16 The central corridor project continues  
17 to impact approximately two miles of our most critical  
18 piping systems. The total estimated cost of the  
19 impact continues to be approximately \$20 million:  
20 \$17.6 million for new pipe, 2.4 for demolition of old.  
21 As 501(c)3 nonprofits form to lessen the burdens of  
22 government and serve the energy needs of this  
23 community, we do not have the means to cover these  
24 costs. Unless funding solutions can be found, all  
25 costs will be borne by our small customer base, which

0029

1 would be harmful to many. We and our customers  
2 continue to face a serious problems, and the  
3 construction of this project is potentially just over  
4 a year away.

5 District Energy St. Paul started over  
6 25 year ago with an idea; an idea that has grown to  
7 become the most successful district energy system in  
8 America. Communities and leaders from around the  
9 country and the world continue to flock to St. Paul to  
10 learn from us and find solutions to secure their  
11 community's energy future and reduce their carbon  
12 emissions. It is essential that this critically  
13 important central corridor project continue to move  
14 forward but not be achieved at the expense of one of  
15 St. Paul's true renewable energy success stories.  
16 Solutions must be found to help mitigate the impacts  
17 this project is having on District Energy, District  
18 Cooling, and our customers.

19 To understate and underestimate the  
20 seriousness of the impacts of your renewable energy  
21 program in the first draft EIS and now in the  
22 supplemental DEIS is not an acceptable practice.  
23 Thank you for the opportunity to make a comment.

24 CHAIRMAN BELL: I appreciate your  
25 coming down. Thank you. Our next presenter is John

0030

1 Slade. Mr. Slade, welcome.

Aug9-Li ghtra i l

2 MR. SLADE: Thank you very much.  
3 Chairman Bell, commissioners, members of the  
4 community, my name is John Slade, and I'm an organizer  
5 working for MICAH, the Metropolitan Interfaith Council  
6 on Affordable Housing. We've been active in  
7 Minneapolis and St. Paul for over 20 years fighting  
8 for a metropolitan area where everyone, without  
9 exception, has a safe, decent, and affordable home.  
10 In cities like St. Paul, land use is much more stable  
11 than it is in the suburbs. There's not that much  
12 going on to really stir things up. The central  
13 corridor line is definitely stirring things up. We at  
14 MICAH stand for the underlying principle that the  
15 development of this line should benefit the neighbors  
16 and neighborhoods it runs through.

17 We've been having a lot of discussions  
18 on the line. In talking with the folks at the  
19 Minnesota Center for Environmental Advocacy, they say  
20 there's three ways in which a line like this kind of  
21 benefits people. One way is it gets people from here  
22 to there. It also can relieve congestion, although it  
23 doesn't really do that too much. And the last and  
24 most important is that lines like this create location  
25 efficiency, which is kind of a technical way of saying

0031  
1 that the land around the station stops gets much more  
2 valuable.

3 So we deal with housing and get housing  
4 when people build houses or apartments and, of course,  
5 they need land to build it on, so we at MICAH are very  
6 concerned with what happens to land use and land  
7 value. So if we invest a lot of money and  
8 infrastructure, then the land values, they go up, and  
9 they go up particularly near the stations. If you  
10 got, like, a free map of land value, the station --  
11 each of those stations kind of pulls up a mountain of  
12 land value around it. And we kind of look at that as  
13 kind of a mountain range of increased value stretching  
14 down University. The sun, I can see the sun shining  
15 brightly on the tops of these mountains and they can  
16 be golden mountains, so peaks of gold in the sun.

17 One of the things that we watch for as  
18 these mountains get created is that the people who are  
19 there don't go tumbling off the sides and into the  
20 dark valleys. So that's gentrification; that is a  
21 disservice in the local neighborhoods. And the other  
22 thing that we want (inaudible), and this speaks  
23 directly to the -- what the SDEIS talked about, if  
24 each station stop is a golden mountain of land value,  
25 why do the people between Snelling and Rice get one

0032  
1 mountain per mile? Where are the golden mountains of  
2 land value for the people who live around Western and  
3 Victoria and Hamline? And why is it that these  
4 people, a lot of whom are Asian, African-American, or  
5 African, get a dark valley instead of a golden  
6 mountain?

7 So that's one of the ways that we're  
8 looking at three stations on (inaudible), and one of  
9 the reasons why we're supporting the line going in  
10 with those three stations (inaudible). Thank you.

11 CHAIRMAN BELL: Thank you for your  
12 presentation. The next presenter is Linda Sullivan.

Aug9-Li ghtra i l

13 Wel come.

14 MS. SULLIVAN: Thanks. I'm a citizen  
15 of St. Paul; I have been for a while. And the only  
16 thing I can see that this project is doing is cutting  
17 neighborhoods in half. I can see the elder people  
18 trying to cross the street and they can't. There have  
19 been fatalities from the old light rail in Hiawatha.  
20 They anticipated the price will be 400 million plus  
21 when it came in at 800 million. And I would like to  
22 know how much is it going to cost? I hear that 626  
23 million was supposed to be designated from the federal  
24 government; however, I hear 550 from the government  
25 now -- 425, and I can see that our taxes are going to

0033

1 go up. Since the Hiawatha went into effect, my  
2 property taxation on public transit has gone up three  
3 times, and I don't feel that the people can afford  
4 this.

5 I have gone to the University of  
6 Minnesota, and to have light rail go over the  
7 Washington bridge, I beg to differ that it will fall  
8 into the river, just like all the rest of the bridges.  
9 I think we need to build up the bridges and streets,  
10 and if anything is left over, then try for light rail.  
11 But I'm tired of people that do not live in this area  
12 telling us what to do and when to do it, because we  
13 don't have any say in this because the meetings are  
14 the day before Memorial Day, the day of 4th of July or  
15 high noon when people would have to take off work to  
16 attend these meetings. People have said that they  
17 don't want them, and they were going to lose their  
18 parking spots in front of their businesses down  
19 University, and if they do that, they're going to  
20 close up, our taxes are going to go through the roof,  
21 and I don't believe that the property taxation  
22 department is going to increase our values because  
23 we're close to light rail. But I promise you, if it's  
24 noisy in the middle of the night, I'm coming to your  
25 house to sleep at night because I am tired of telling

0034

1 of people that we do not want it. Or put it on 94,  
2 which is supposed to be an ideal location, or down  
3 Energy Park rail systems because it would be more comp  
4 -- more beneficial for everyone. And we are not  
5 benefitting the City of St. Paul because there's too  
6 many obstacles, and I have never heard nothing being  
7 addressed on those obstacles.

8 And I'm going to be talking to the  
9 University president within the next 30 days, because  
10 he and I have had several discussions and I think he  
11 is not for it, as well. Because if you want your  
12 mother to go and she has a heart attack, she's not  
13 going to get in the emergency area of the University  
14 of Minnesota because light rail is coming through.  
15 Now, does that make any sense in your book? I don't  
16 think -- I think you need to make the light rail from  
17 Minneapolis out to Edina or some of the other suburbs,  
18 but that isn't where you're putting it. You want it  
19 in downtown St. Paul. Well, downtown St. Paul is not  
20 going to benefit. It's going to the Vikings and the  
21 Gophers --

22 CHAIRMAN BELL: Ms. Sullivan, your time  
23 is up.

Aug9-Lightrail

24 MS. SULLIVAN: Thank you.  
25 CHAIRMAN BELL: Thank you for your  
0035  
1 comments. The last presenter that has asked to make a  
2 comment is Lorraine Sullivan. Welcome.  
3 MS. SULLIVAN: I don't know if you're  
4 the Mr. Bell that I've been reading a lot about --  
5 AUDIENCE MEMBER: We can't hear you.  
6 MS. SULLIVAN: I don't know if you're  
7 the Mr. Bell that I've been reading a lot about, and  
8 I'm awful angry because, if you're the one that's in  
9 Edina, why are -- are you the one that lives in Edina?  
10 CHAIRMAN BELL: No.  
11 MS. SULLIVAN: You don't have to  
12 answer.  
13 CHAIRMAN BELL: No.  
14 MS. SULLIVAN: But your name is Mr.  
15 Bell?  
16 CHAIRMAN BELL: Yes.  
17 MS. SULLIVAN: And I've heard a lot  
18 about a Mr. Bell from Edina, and I don't know why he  
19 and some guy from Red Wing and some guy from Maple  
20 Grove, all these people that are far away are the ones  
21 that are in this light rail business. Why? They're  
22 not even living -- I live pretty close to University.  
23 I'm Lorraine Sullivan. I live at 1690 Thomas Avenue  
24 in St. Paul, and I live close to -- I'm looking  
25 forward retirement so I can enjoy my home and my yard.

0036  
1 It looks like I'm going to have to get rid of it. I  
2 can't afford it with the bills coming in. We pay for  
3 street (inaudible), tree trimming, they never come  
4 around. (Inaudible) and these bills are going to come  
5 in with this light rail deal. Where are we supposed  
6 to get the money? I don't even -- I can't even live  
7 on social security, I'm 82 years old and I'm still  
8 working because I can't afford to quit. I'd like to  
9 know where are we supposed to get money to pay for all  
10 these bills that are coming in? And I think that's --  
11 if you're not the Mr. Bell, then I'm sorry. But  
12 anyway, I'm still hoping I can meet him. He's in  
13 Edina and I don't think he has the right to fight for  
14 our light rail if he's not going to be riding it. So.  
15 CHAIRMAN BELL: That's not me.  
16 MS. SULLIVAN: You know, if I got  
17 another second, I would like to say, all those people  
18 from working in the courthouse, they build a  
19 courthouse just inside the city limits, and they have  
20 their own cars, maybe they should -- how come they're  
21 not going to be able to ride the light rail because  
22 the amount of cars and live away from downtown? Let  
23 them come back to St. Paul, ride the light rail, and  
24 we'll (inaudible) state cars so we need to save that  
25 money. Okay. Thank you.

0037  
1 CHAIRMAN BELL: Ms. Sullivan, thank you  
2 very much for coming down and sharing your concerns.  
3 That is the end of the list of people who have signed  
4 up, but I want to provide an opportunity for anyone  
5 else in the audience who didn't sign up that would  
6 like to make a brief comment for the record to have an  
7 opportunity to do so now. Would anyone else like to  
8 -- yes, sir?

Aug9-Li ghtrail

9 AUDIENCE MEMBER: Mr. Bell, I don't  
10 have a speech. I just wanted to say that I'm from  
11 Senator Ellen Anderson's office, and Ellen has been to  
12 a number of central corridor meetings and I'm here to  
13 just listen, and I've been taking notes, and Ellen  
14 wants to keep up on it. Thank you.

15 CHAIRMAN BELL: Thank you. I think  
16 Senator -- I think she was at the first meeting that  
17 we had, actually. So anyone else like to make a  
18 comment? All right. Before we adjourn, I would just  
19 remind everyone that we are accepting written comments  
20 that are due by August 25th. And so, if you would  
21 like to have an additional written comment or if you  
22 have someone else that you know that has a question or  
23 a concern, I should say, about the SDEIS, I would  
24 encourage you to submit a written comment or have them  
25 submit a written comment by August 25th. And with

0038  
1 that, thank you all for taking time out of a beautiful  
2 Saturday and coming down. We're adjourned.

3 (Whereupon, the hearing was concluded at  
4 2:53 p. m.)

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

0039  
1 STATE OF MINNESOTA )  
2 COUNTY OF RAMSEY )ss. CERTIFICATE  
3 BE IT KNOWN that I, Jenelle Lundgren, took the  
4 foregoing hearing;

5 That the testimony of said parties was recorded  
6 in shorthand by me and was reduced to typewriting  
7 under my direction;

8 That the foregoing hearing is a true record of  
9 the testimony given by said parties;

10 That I am not related to any of the parties  
11 hereto, nor an employee of them, nor interested in the  
outcome of the action;

12 That the cost of the original has been charged to  
13 the party who noticed the hearing, and that all  
14 parties who ordered copies have been charged at the  
15 same rate for such copies;

Aug9-Lightrail

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

WITNESS MY HAND AND SEAL this 14th day of August,  
2008.

JENELLE LUNDGREN, Notary Public

# **Public Hearing Sign-in Sheets**

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Clarence Schadegg	Access Press	1871 University Ave Main Floor Griggs-Midway	
✓ ULTAN DUGGAN	SELF.	1447-1455 UNIV AVE. HOME 2331 COPPERFIELD - MENDOTA Hgts.	✓ 11:30
✓ ANDREA LUBOV	Jewish Community Action	home: 2096 Roblyn Ave St. Paul MN 55104	✓ 11:51
✓ BRIAN MCMAHON	UNIVERSITY UNITED	1959 UNIVERSITY AVE ST. P 55104	✓ 11:54
✓ STEVE BOWMAN	GRAND FROGTOWN CDC	533 Dale St. N SAINT PAUL, MN 55103	✓ 11:55
Charles Josephes	SELF	211 W. Baker St. St. Paul MN 55107	
✓ Russ Williams	Fairview	2450 Riverside Ave. Suite M-237 Minneapolis, MN 55454	✓ 11:58
✓ Joel Clemmer	DCCC	2154 Fairmount Avenue 55105	✓ 11:59
Jeff Patterson	Colliers Int'l.	200 S. Sixth St. #1400 mpls. 55402 jett.patterson@ciint.com	

Date: 7-4-08

Page: 2 of



# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Frederique Siegel	St Paul PED		No.
Ray Sobiech	self		X
Sen. Ellen Anderson	MN Senate	120 State Capitol STP	
Joan Vanhula	Alliance for Metropolitan Stability	joan@metro-stability.org	

12:01

Date: 7-4-08

Page: 3 of

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Tim Casey	HDR	701 Xenia Ave So. # 600	
Tom Hefty	Ramsay City		
Red Southall	METC	METC	
Yoni Carter	Ramsay County	15 W Kellogg 55102 220 CH/CHD	
Janet Elt	Ramsay County	15 W. Kellogg 55102	
Deborah Smith	self		
Delores J. Matthews	self		
Anne White	DCC		
Paul Marshall	CRAPPB - State of MN	Rm 204 Admin 50 Sherburne Ave St. Paul 55155	

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Carol Swenson	DCC	already have	
Polly Bowles	Met Council	have	
Cheryl Wilson	MICAH	cheryl@michah.org	
Erin Winterold	MICAH	thecricketjade@yahoo.com	
Marlee Leebrick-Stryker	MICAH	London Still 91@gmail.com	
Mary Kay Delvo	U of M Alumni	delvo003@umn.edu	
Barb Boler			12:45 ✓

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Cam Gordon	City Council		

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Paul Menard	Self/Family	897 Sherburne ave St. Paul, MN	NO



Date: \_\_\_\_\_

Page: \_\_\_ of \_\_\_

---

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Joseph Scala	Hennepin County	joseph.scala@co.hennepin.mn.us	
Renee Lundgren	MICA#	renee@michigan.org	✓
LESLIE DAVIS	EARTH PROTECTOR	PO Box 11682 Mpls. 55411 612/522-9433 LESLIE@EARTHPROTECTOR.ORG	
Gary Kettunen	SELF	gakettunen@yahoo.com	✓
PAUL WHITE	SELF	PAUL@PROJECTRESOURCES.NET	✓
Carol Swenson	DCC		
Peggy Leppik	Met Council		
Peg Wolff	U of M	Wolff002@umn.edu	
Brian Hamunen	West Bank CDC		

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Roderic Sostare	METC	METC	
Peter Zepelak	self	4580 Kimberly Ct. N, Plymouth, MN 55446	
Russ Williams	Fairview	2450 Riverside M-237 Minneapolis, MN 55454	
TIM MURKIN	WRLDC	1000 RIVERSIDE AVE 55454	6:05 pm ✓
Sanku	UMAA	-UMAA-	<del> </del> no speak

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Kari Sheldon	Self	bbwheels 2002@yahoo.com	
John Brodrick	Self	john.brodrick@spps.org	
Terry Henry	Self	laura plus terry@gmail.com	1:23 pm ✓
Steve Morris	Ramsay <sup>Regional Authority</sup> <del>County</del>		
Leslie Davis	<del>Earth Protectors</del> Earth Protectors	leslie@earthprotector.org	1:30 pm ✓
Terry Olsen	Self		
Tim Mayasich	Ramsay Rail		
Erin Winter <sup>völb</sup> <del>völb</del>	MICAAT	thecricketjade@yahoo.com	1:47 pm ✓
Scott Halstead	Self	SHalstead@gmail.com	T 49



# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
Janette A Gudge	self		
Sandra Kressbaum	self		
✓ Carol Swenson	DCC		✓ 1:50
✓ Marlee Leebricht	Stryker	MICAH	✓ 1:55
✓ Tmychael Rambo	Self	tmychaelrambo@aol.com	1:56 ✓
✓ Ken Smith	District Energy	ken.smith@districtenergy.com	1:58 ✓
Ross Williams	Fairview		
✓ John Slade	MICAH	slade@micah.org	1:57 ✓
Andrea Lubov			

# Attendance Sign-in Sheet



Name	Representing Organization Self	Contact Information (mailing address, email, or phone)	Check here if you would like to comment
<del>Timothy Aetrambo</del>	<del>Self</del>	<del>timothy.aetrambo@aol.com</del>	<del>Yes</del>
Linda Sullivan	Self		✓ 2:03
Lorraine Sullivan	self		✓ 2:08
Don Jorovsky	Sen. Ellen Andersens office		✓
Marilyn Bruhn	Self		
June Wallace	PPERRIA		
Joni Carter	RCRRA		

25/11

Date: \_\_\_\_\_

Page: \_\_\_ of \_\_\_