

Appendix I

Responses to Comments Received on the Supplemental Draft EIS Scope

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APPENDIX I**Responses to Comments Received on the Supplemental Draft EIS Scope**

On July 22, 2013, the Metropolitan Council (Council) issued notice in the Environmental Quality Board *EQB Monitor* and the *Federal Register* of its intent to publish a Supplemental Draft Environmental Impact Statement (EIS) for the Southwest Light Rail Transit (LRT) Project, which was formerly referred to as the Southwest Transitway Project (see Appendix K for copies of those notices). As part of the EQB notice, the public was invited to comment on the proposed scope of the Supplemental Draft EIS. The Council accepted comments on the scope of the Supplemental Draft EIS through August 12, 2013.

As noted in the EQB and *Federal Register* notices, the purpose of the Supplemental Draft EIS is to supplement the evaluation of impacts included in the project's Draft EIS where there have been adjustments to the design of the light rail and freight rail stations, park-and-ride lots, and an operations and maintenance facility that would likely result in impacts not documented in the project's Draft EIS.

This appendix first provides a summary of the comments received during the comment period on the proposed scope of the Supplemental Draft EIS, followed by the Council's responses to those comments based on common themes among the comments. Finally, this appendix includes copies of the comments received during the comment period on the proposed scope of the Supplemental Draft EIS.

A. Summary of Scope Comments Received

The Council received 59 letters and emails during the comment period offering a variety of comments on the scope of the Supplemental Draft EIS and other topics. Of the letters and emails received: 43 were sent by private individuals; nine by businesses, interest groups, or organizations; and seven by agencies or jurisdictions.¹

The following businesses, community groups, and non-profit organizations submitted comments:

- Safety in the Park
- Liberty Property Trust
- SPS Companies, Inc.
- Eaton Corporation – Hydraulics Group
- Sorensen Neighborhood Association Steering Committee
- Transit for Livable Communities
- SFI Ltd. Partnership 54, Claremont Apartments
- West Calhoun Neighborhood Council and the Edge Business Association

The following agencies and jurisdictions submitted comments:

- City of Minneapolis
- City of St. Louis Park
- City of Eden Prairie
- U.S. Department of Interior
- Hennepin County

¹ Note that multiple comments from individuals and entities, even if they are identical in their content, are accounted for in the total numbers of comments received.

B. Comment Themes and Responses

This section outlines the general themes of comments that the Council received on the proposed scope of the Supplemental Draft EIS. Under each theme, this section summarizes one or more comments received and it provides a response to each comment. The comments itemized in this section were taken from one or more of the comments documented in Section C of this appendix. The comments received generally fell within the following themes:

- Tunnel options, including a deep tunnel option
- LRT grade-separation options
- Different freight rail alignment options
- Other light rail alignments, features, connections, or lengths of alignment
- The location of proposed light rail stations, park-and-ride lots, and Operations and Maintenance Facility (OMF)
- Cedar Lake Trail options
- Comments of Scope Concerning Analysis of Social, Economic, Environmental, and Transportation Effects

Theme 1: Tunnel Options/Deep Tunnel

Comment: *Construct a deep tunnel through the Kenilworth Corridor; tunnel below the Kenilworth Channel; extend a deep tunnel back to Lake Street*

Response: Chapter 2 of this Supplemental Draft Environmental Impact Statement (EIS) describes alternative adjustments considered for the Kenilworth Corridor, including a deep tunnel option. Public testimony was received on the proposed Project scope and budget at the Corridor Management Committee (CMC) on April 2, 2014 and the Council meeting on April 9, 2014. The Council took action on April 9, 2014 on the project scope and budget including incorporating shallow LRT tunnels in the Kenilworth Corridor, after considering recommendations from the CMC, input from other project committees, public comments, and the analysis and findings prepared by the project team. Please refer to Section 2.5.3 of the Supplemental Draft EIS for additional information on the Kenilworth Deep Bore LRT Tunnels.

Theme 2: Light Rail Grade Separations

Comment: *Evaluate grade separations of light rail tracks with freight rail and streets at Yosemite Avenue, Xenwood Avenue, Beltline Boulevard, Wooddale Avenue, and 28th Street*

Response: The Supplemental Draft EIS identifies grade separations at roadway intersections where traffic analysis conducted for the Supplemental Draft EIS indicated operational conditions would not meet acceptable level of service and safety standards following construction of the project. Grade separations of light rail are proposed at Louisiana, Highway 100, West Lake Street, Cedar Lake Parkway, Burnham Road, and 21st Street. See Section 3.4.4.2 for additional information on proposed light rail grade separations and at-grade crossings.

Theme 3: Different Freight Rail Alignment

Comment: *Evaluate other freight alignments, including near Highway 169, modified MN&S to moderate grades and curves on wider berm; separate freight rail issue from LRT and start LPA process over; remove relocation alternatives*

Response 3A: Evaluate Other Freight Rail Alignments. In October 2013, the Council initiated an independent engineering analysis that re-evaluated freight rail relocation adjustments that were developed in prior studies and prior project phases. The results of that independent analysis are summarized in Section 2.5.3.2.A of the Supplemental Draft EIS.

Response 3B: Modify MN&S. Several options that would modify the existing MN&S spur to allow TC&W freight trains to be relocated out of the Kenilworth Corridor were developed and evaluated following the

close of the Draft EIS comment period in communication with the owning railroad (Canadian Pacific Railway), the primary operating railroad (TC&W Railway), and the City of St. Louis Park. In addition, in October 2013, the Council initiated an independent engineering analysis that identified and evaluated a new variation on the option to modify connections the MN&S Spur, known as the MN&S North freight rail adjustment. See Section 2.5.3.2.A of the Supplemental Draft EIS for additional information on freight rail modifications to the MN&S Spur that were developed and evaluated after publication of the Draft EIS.

Response 3C: Separate Freight Rail and LRT. During the Draft EIS, the Federal Transit Administration (FTA) determined that the issue of freight rail location must be addressed as a component of the Southwest LRT (METRO Green Line Extension) Project and directed Hennepin County Regional Railroad Authority (HCRRA), the local lead agency at the time, to evaluate the issue within the Southwest Transitway Draft EIS. The Council, transitioning to lead local agency in January 2013, continues to follow that direction from FTA. The Supplemental Draft EIS reflects the continued evaluation of freight rail location options relevant to the locally preferred LRT alternative consistent with FTA direction. See Section 2.3 of the Supplemental Draft EIS for additional information.

Response 3D: Remove Relocation Alternatives. On April 9, 2014, the Council, considering recommendations from the CMC, input from other project committees, public comments, and the analysis and findings prepared by the project team, determined that the Kenilworth Shallow LRT Tunnels should be incorporated into the LPA, which would allow TC&W to continue to operate freight rail train service in the Kenilworth Corridor. See Section 2.3.5 of the Supplemental Draft EIS for additional information.

Theme 4: Other LRT Alignments/Features/Connections/Length

Comment: Evaluate LRT improvements that include: a revised alignment along Highway 100 north to I-394, then east; a route other than through the Cedar Lake area; single track LRT through the Kenilworth from West Lake Street to Penn Avenue; minimum operating segment; connectivity to other modes such as streetcars; elevated LRT structure with bike trail on paved "roof"; renewed consideration of the non-tunnel co-location options.

Response: Section 2.3 of the Supplemental Draft EIS provides a summary description of the scoping process for the project's EIS, which included the development and evaluation of a wide range of alternatives and options. In addition, Sections 2.4 and 2.5 of the Supplemental Draft EIS provide a detailed description of the process used by the Council to identify a wide range of adjustments to the LPA that were developed and considered following publication of the Draft EIS.

Theme 5: Location of LRT Stations, Park-and-Ride Lots, and Operations and Maintenance Facility

Comment: Remove park-and-ride lots not proposed by the Council; remove the OMF in Eden Prairie; add an LRT station and park and ride in northwest corner of Eden Prairie City Center property.

Response: Section 2.2 of the Supplemental Draft EIS provides a summary of the park-and-ride lots included within the LPA in the Eden Prairie and St. Louis Park/Minneapolis Segments, as well as the proposed Hopkins OMF. Section 2.5 provides a summary of the range of adjustments to the LPA developed and evaluated following publication of the Draft EIS for those segments and the OMF.

Theme 6: Cedar Lake Trail Options

Comment: Evaluate alternative locations for the Cedar Lake Trail, including tunnel under the MN&S at 27th Street West; bridge over the "iron triangle" wye; reroute south of 21st Street; reroute through Kenilworth corridor (suggested route provided on map)

Response: Section 2.5.3.2 of the Supplemental Draft EIS summarizes design adjustments to the LPA considered in the Kenilworth Corridor, including one design that would have relocated the Cedar Lake Trail out of the corridor and one that would have placed the trail on a structure over the at-grade light rail line. These and other options were presented, along with other ideas from attendees, at public open houses on July 17 and 18, 2013.

Theme 7: Comments of Scope Concerning Analysis of Social, Economic, Environmental, and Transportation Effects

Comment 7A: *Social Effects—Include analysis of redevelopment/reuse of properties that consider development-friendly configurations; include relocation analysis for displaced public facilities, businesses, and residents (including affordable business locations); evaluate and compare residential and business impacts by alternative; analyze community services and community cohesion; analyze parklands, trails, and visual quality impacts.*

Response 7A: Chapter 3 of the Supplemental Draft EIS includes the analysis of effects of the LPA on potential development/redevelopment of land, potential property acquisitions and displacements/relocations (by residential, commercial, and public use), community cohesion, parks, recreation areas and trails, and visual resources in the Eden Prairie and St. Louis Park/Minneapolis Segments and the Hopkins OMF.

Comment 7B: *Address freight rail impacts, including the following: define and evaluate methods to mitigate impacts and the costs of mitigation for the Brunswick Central freight rail relocation and Minneapolis segment; analyze freight operations during construction; use a computer analysis of freight trains on re-routes at 25 mph.*

Response 7B: Section 3.5.3 of the Supplemental Draft EIS provides background on the range of potential adjustments to the LPA considered for the freight rail relocation and Kenilworth Corridor options, including cost elements that were considered among other evaluation measures. Section 3.4 provides analysis of freight operations during construction, focusing on the freight rail operations in the Kenilworth Corridor. Detailed computer-based analyses of freight train operations were not necessary to prepare an adequate analysis.

Comment 7C: *Environmental Effects—Evaluate impacts to the environment including the following: noise, vibration, air quality, water quality, wetlands, wildlife, trees/vegetation, and flood analysis; Section 106 Compliance (historic/archaeological resources); Section 4(f) compliance (park and recreation areas, wildlife/waterfowl refuges, historic/archaeological resources); lake water analysis in Cedar Lake and Lake of the Isles; and ground water movement between the lakes.*

Response 7C: Chapter 3 of the Supplemental Draft EIS assesses the environmental effects of the LPA in the Eden Prairie and St. Louis Park/Minneapolis Segments and for the Hopkins OMF. Section 3.1 provides a summary of the environmental categories addressed in Section 3.2, Section 3.3, and Section 3.4. In particular, Section 3.4 addresses the groundwater and water resources in the Kenilworth Corridor related to Cedar Lake and Lake of the Isles. Chapter 3 updates the project's documentation related to Section 106 compliance, including preliminary Section 106 findings of effects throughout the project corridor. Section 3.5 provides a Draft Section 4(f) Evaluation Update, including preliminary Section 4(f) determinations throughout the project corridor. Section 2.5 of the Supplemental Draft EIS identifies how environmental evaluation measures were considered in the development and evaluation of design adjustments to the LPA since publication of the Draft EIS.

Comment 7D: *Transportation Effects—Comments concerning the impact to transportation and safety issues that include the following: analysis of safety concerning construction of the project, emergency response times, and freight rail derailments; general safety of pedestrians, bicyclist and vehicles with the trail and roadway changes; analysis of traffic circulation and vehicle parking; analysis of the effects that each alternative would have on the full implementation of Met Council's regional transitways including ridership impacts from an underground West Lake Street station, elimination of the 21st Street station and the connection between SWLRT and the Midtown Corridor; rerouted freight trains in close proximity to the Xcel electric substation.*

Response 7D: Chapter 3 of the Supplemental Draft EIS includes an assessment of transportation and safety related impacts of the LPA in the Eden Prairie and St. Louis Park/Minneapolis Segments and for the Hopkins OMF. Section 3.1 provides a summary of the sub-categories under transportation and safety that are addressed for the two segments and OMF. Section 2.5 of the Supplemental Draft EIS identifies how transportation and safety-related evaluation measures were considered in the development and evaluation of design adjustments to the LPA since publication of the Draft EIS.

C. Comments Received on the Proposed Scope of the Supplemental Draft EIS

Following are copies of the letters and emails received by the Council proving comments on the proposed scope of the Supplemental Draft EIS. The letters and emails were received between issuance of the notice of intent to publish a Supplemental Draft EIS (July 22, 2013) and close of the comment period (August 12, 2013).

The letters and emails are listed in order of their receipt by the Council, under the following categories: 1) the general public; 2) businesses, interest groups, or organizations; and 3) agencies or jurisdictions. Responses to the general themes of comments received are included in Section B of this appendix.

Comments from the General Public

From: [Curt Rahman](#)
To: [Jacobson, Nani](#)
Subject: SWLRT SDEIS comments
Date: Monday, July 22, 2013 1:03:27 PM

I attended the "Minneapolis" SWLRT open house which presented cost estimates and the recommended 3 options from the project office which are:

1. Shallow cut and cover tunnel- \$150 million
2. Deep Bore tunnel- \$300 million
3. Relocation of Freight to St. Louis Park- Brunswick Central- \$200 million

It was clear that Minneapolis residents do not want more train traffic in Kenwood. Both tunnel options try to solve this by keeping 5 freight trains per day in Kenilworth and moving the 220 light rail trains per day underground.

Relocation moves 5 freight trains per day to St. Louis Park and then moves **220 trains per day** through Kenilworth **above ground**.

With relocation, Minneapolis gets massively increased above ground traffic in Kenilworth and St. Louis Park endures all the issues of relocation. Both cities lose with relocation.

Curt Rahman, Business Advisor to the SWLRT
612-207-5411

From: [Curt Rahman](#)
To: [Jacobson, Nani](#)
Subject: More SWLRT SDEIS comments
Date: Monday, July 22, 2013 1:06:28 PM

As a Business Advisory Committee Representative to the SWLRT and as a business owner in Saint Louis Park I have learned a great deal about the various options and I have tried to keep an open mind on the re-route. The two latest proposals that do not require co-location, however, are not acceptable solutions no matter the amount of mitigation provided given the attendant costs, both actual and intangible. These proposals displace businesses and hundreds of jobs, cut off roads, eliminate parking and they literally build a "Great Wall of Freight" that cuts the city in half.

Re-Route- Brunswick West: In this proposal, there are 42 properties affected, but most of them are commercial. I happen to own three buildings with 10 business tenants that will have to be moved. How many businesses are affected? 80? Will those businesses stay in St. Louis Park? Are there locations available for them to move to? Does the new artificial turf Athletic Field count as one owner? Hundreds of teams use the new athletic field; school teams, associations and club teams.

Re-Route- Brunswick Central: In this proposal, there are 30 properties affected, but most of them are commercial. I own one affected building with 5 business tenants that will have to be moved. How many businesses are affected? 60?

Affordable business locations: Like affordable housing, not all businesses can afford the \$25 to \$50 per SF costs of rental space at new developments along 36th St, Excelsior and Grand or The West End. If you want "main street" businesses (versus chain and big box stores), you need "main street" business zones. These reroute options gut those "main street" business zones of commercial property.

All cost estimates need to include:

-loss of commercial tax revenue to the city, county, state and school districts

-loss of jobs in the community

-Relocation expenses for owners and tenants such as:

- Tenant improvements
- Moving costs
- New signs

- Assistance with closing costs and move logistics
- Any other compensable items under the law

I also must echo Anne Mavity's comments at the St. Louis Park Study Session. There are at least 40 personal residences on the North part of the reroute that are too close to the tracks. They need to be acquired as part of the re-route process because noise and vibration will exceed federal guidelines with the current planned right-of-way. Purchase and demolition of these 40 residences needs to be added to the cost estimates of this project.

Building a 20 foot and larger berm across the center of the city (16 feet high at Wooddale so trucks can get under it) harms the environment, road access, parking and is a visual eyesore. In the event of a derailment or accident, rail cars tumbling down the berm will certainly exacerbate the damage to the community as a result of the derailment. This "Great Wall of Freight" will severely offset any benefits light rail brings to the community.

If either re-route option is built, as few streets as possible should be cut off to retain traffic flow for the neighborhood and the businesses. This will mean building bridges. In addition, eliminating streets eliminates "on street" parking that is heavily used in these business districts and neighborhoods. Excess land taken by the project that is not being used should become parking. This includes:

- Central alignment: North and East of the Athletic field. Dakota should not be closed on the North side of the Athletic field as stated on the plans.
- Central alignment: The abandoned Canadian Pacific rail bed should all become parking to replace on street parking removed. With the new athletic field, the High School and the businesses on West Lake, this area has a parking problem today.
- West alignment: Parking is a problem near PSI, Central Community and 3540-50 Dakota. People often park on the dead end that fronts on the north side of Highway 7 (south of 3540-50 Dakota). This dead end is proposed to become a North HWY 7 frontage road on the plans. This will further reduce parking in the area. Walker Street is slated to dead end into a Cul de Sac. This should be made as large as possible and become all parking. 3540 Dakota also has two 16 foot loading doors on the northwest corner that become inaccessible for trucks if this is a dead end.

When all of the real costs, actual and intangible, are included I believe the co-location options will turn out to be most cost effective. The disproportionate impact on businesses and our schools, combined with effectively cutting the city in half, significantly and negatively impacts the City of St. Louis Park. Many other business owners in the area agree with my assessment. My vote is for **Co-Location**. Do not build the "Great Wall of Freight".

If you have any questions, please call me to discuss.

Curtis Rahman, Business Advisory Committee Representative to the SWLRT

612-207-5411

curtrahman@gmail.com

From: [Bill James](#)
To: [Susan Sanger](#)
Cc: [Anne Mavity SLP](#); jjacobs1956@yahoo.com Jacobs; [Tom Harmening](#); [Jake Spano](#); [Susan Santa](#); [Julia Ross](#); [Steve Hallfin](#); [Kevin Locke](#); [Jacobson, Nani](#)
Subject: Re: PDF of SDEIS Notice of Intent
Date: Tuesday, July 23, 2013 4:11:27 PM

Hi all,

All of these suggestions and any other documentation which the City chooses to include into a submittal for the SDEIS have to be submitted directly to Ms. Nani Jacobson, Project Manager, Southwest Light Rail Transit Project Office, 6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426, Telephone: 612-373-3808; E-mail: nani.jacobson@metrotransit.org by August 12, 2013.

She is the record keeper for your recommendations being entered into the official record for comment there at SWLRT SPO.

Thanks much,
Bill

Bill James
SWLRT CAC and CMC Rep
billjames@q.com
612.281.1089

On Jul 23, 2013, at 3:51 PM, Susan Sanger <suesanger@comcast.net> wrote:

Regarding point #2 of Anne's note, we specifically requested in our recent letter to Met Council that Beltline Blvd be made into a tunnel under the trail and freight and LRT tracks.

Sue

On Jul 23, 2013, at 3:16 PM, Anne Mavity SLP wrote:

Hi Bill,

I couldn't open the doc that Jami sent regarding talking points. But I would add these as well:

1. The trains are not moving FROM SLP to MPLS. Those trains (freight and LRT) will be co-located through SLP, and have co-location mitigation needs throughout, but especially at Wooddale and Beltline.
2. Key mitigation for co-location at Wooddale and Beltline is grade separation of some fashion. We have renderings of what that might look like at Beltline (trail goes over, traffic goes under, all trains at-grade) but are still exploring options

at Wooddale (trail under, traffic under but maybe a block EAST of Wooddale, etc). Grade separation is not currently a part of the Met Council's proposal or, I assume, their budget, but it should be. This is probably the most important point of all, in terms of minimizing the impact of traffic congestion under the co-location scenario in SLP.

3. Noise mitigation will be a big issue at Wooddale particularly, since I believe freight trains MUST blow their horns at the crossing.

Thanks.

Anne

On Jul 22, 2013, at 2:21 PM, Bill James
<bjames@seeonic.com> wrote:

<2013-17506.pdf>

Bill James | Seeonic Inc. | Vice President Business Development |
(c) 612-281-1089 | (o) 763-383-9360 | bjames@seeonic.com | 1848
Berkshire Lane North Plymouth, MN 55441

Ü **SAVE PAPER - THINK BEFORE YOU PRINT**

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From: [Michael Krogan](#)
To: [Jacobson, Nani](#)
Subject: SWLRT
Date: Sunday, July 28, 2013 6:43:08 AM

This project is a not needed and is a tremendous waste of taxpayer money. It is no wonder the Federal govt is 17 trillion dollars in debt and has an approval rating of about 10%.

Forget the re-routes and berms and tunnels, etc. Don't destroy the Kenilworth trails. Shut down the whole operation now.

Most people I know do not go to downtown Mpls., and will not go downtown Mpls., EVER.

**Mike Krogan
Eliot View Neighborhood**

From: [Douglas Peterson](#)
To: [swlrt](#)
Subject: KENILWORTH DEEP TUNNEL
Date: Monday, July 29, 2013 4:01:15 PM

Southwest Corridor LRT Must Include Deep Tunnel

A deep tunnel in the Kenilworth Corridor for the Southwest LRT is absolutely necessary to avoid lawsuits by parties affected by the proposed light rail line and the probable loss of federal funding incident to the commencement of any such lawsuit. My wife, Linda, and I own and reside in a townhome in the Cedar Lake Shores town homes. We both bike extensively – 1,000 to 2,000 miles a year. We generally bike on the Kenilworth Trail and the Minneapolis and Hennepin Parks bike trails at least two or three times a week. We also use the Kenilworth Trail three or four times a week to walk to the coffee shops, stores and restaurants located in Calhoun Village.

The City of Minneapolis will not consent to co-locating freight train and light rail train (LRT) traffic on the Kenilworth Corridor. Doing so would force 30 to 60 families to lose their homes, take away more than one and one half acres of parkland and, while destroying the public's enjoyment of much additional parkland, eliminate the Kenilworth pedestrian/bike trail. The City of St. Louis Park will not consent to relocating the freight rail traffic to run through that city along a new right of way that includes putting the railroad on a berm that runs as high as 20 feet higher than the surrounding property. Minneapolis reluctantly agreed, for purposes of the Southwest LRT Draft Environmental Impact Statement, to have the light rail run along the Kenilworth Corridor only on the condition that the freight traffic would be re-located, as had been planned for nearly 30 years by all parties concerned, through St. Louis Park along presently existing right of way.

The freight trains now stop traffic on Cedar Lake Parkway at least one half hour each day. The LRT will send at least 220 trains a day through the corridor. According to light rail experts, the amount of time it takes a light rail train to clear a street crossing, including the time it takes for the signal arms to operate, depending on the length of the train, is between 32 and 43 seconds. This means that each day Cedar Lake Parkway will be closed for a minimum of one hour and 45 minutes for light rail and at least a half hour for freight trains. In other words, Cedar Lake Parkway will be closed to rail traffic for at least two hours and fifteen minutes each day in the event of co-location. The Grand Rounds Scenic Byway, of which Cedar Lake Parkway and the Cedar Lake Regional Bike Trail are a part, could lose its national designation of "Grand Rounds Scenic Byway" because of the change in character of the parkway and bike trail. Loss of such designation could result in loss of federal funding to help with improvements to the Byway.

Twin Cities and Western Railroad, the railroad company that currently leases the tracks and right of way from the Hennepin County Regional Railway Authority, decided within the last few months that it would not relocate its rail traffic to St. Louis Park onto the currently existing right of way. It now wants the right of way to be reconfigured to run on a 20-foot high berm through the area in which the local high school football stadium is located. The Metropolitan Council is in charge of working with the various cities, governmental agencies, citizens groups, public and private companies and the county, state and federal governments to facilitate, if possible, the construction and operation of a Southwest Corridor LRT. Because of the impasse created by the railroad, the Met Council has suggested that either a deep tunnel or a shallow covered tunnel could be constructed in the Kenilworth Corridor. A

deep tunnel is the only practical solution.

A shallow tunnel would, at best, require at least one family to lose their home in the neighborhood and would destroy many acres of parkland. It would, according to the Met Council, require three years of construction, leaving an ugly scar through Minneapolis parkland. A deep tunnel, with the freight trains continuing to run through the corridor (with an upgrade in the rail bed to eliminate the horribly squealing train wheels), while not an ideal solution, would satisfy nearly all of the concerns of the Minneapolis and St. Louis Park residents and of the residents in the greater metropolitan region who use the Kenilworth pedestrian/bike path nearly one million times each year.. The Met Council suggests that a deep tunnel would add \$420 million dollars to the originally estimated \$1.25 billion dollar cost of the entire LRT project. If LRT is constructed in the Kenilworth Corridor and the freight trains remain in the corridor, it is money that must be spent. Otherwise, the project must either be modified at the southwest end or scrapped completely.

It makes absolutely no sense to take away homes and destroy a major part of the nationally acclaimed Minneapolis park and trail system to accommodate a poorly conceived and designed LRT project. If there is not enough money to build it responsibly and correctly from Target Field to the last proposed station in Eden Prairie, the LRT, including a deep tunnel in the Kenilworth Corridor, should be built with the money available only to the proposed Hopkins or possibly the proposed Golden Triangle station in Eden Prairie. Park and ride bus accommodations could be provided for the potential LRT users farther to the southwest until additional money is found to extend the service. This should not be a problem with the Met Council as it has not to date expressed any reservations about changes desired by the railroad, St. Louis Park or Eden Prairie from the "locally favored" LRT route and design originally agreed to in the Southwest LRT Draft Environmental Impact Statement.

The numerous meetings that I have attended in both Minneapolis and St. Louis Park have made it evident that there is a complete lack of trust by virtually everyone who has attended those meetings of nearly all of the individuals pushing for this light rail project. We are all aware that Met Council led everyone to believe that a tunnel would be constructed through the University of Minnesota campus. At the last minute, the Met Council determined that its "plans" for a tunnel were too expensive. The project was at that time too far along to stop. A deep tunnel must be constructed through the Kenilworth Corridor. The Met Council will be watched closely to make sure it completes this project correctly or perhaps not at all.

Douglas J. Peterson

3315 Saint Paul Ave.

Minneapolis, MN 55416



From: Pierrobill@aol.com
To: [swlrt](#)
Subject: Southwest LRT
Date: Monday, July 29, 2013 11:11:43 PM

Hello,

I have been reading recently about Minneapolis and the western suburbs and that they are looking at adding light rail, and the current options are going deep beneath the existing heavy rail or a shallow tunnel next to the heavy rail.

What are some options for a system that would be sleek & modern and above the heavy trains?

Less digging, less environmental impact, better views for the travelers etc?

The thought of displacing 32 homes, business and other properties and taking them off the tax rolls seems unnecessary.

What is available or in the mind's eye of some high tech architectural visionaries?

Something in between the very cool roller coasters that are popping up around the world and the heavy concrete structures that are used in some of the elevated systems developed in the past 20 years.

A sleek bridge over the current rail lines could be very architecturally pleasing.

Thank you
Bill Pierro
6324 Waterman Ave.
Edina, MN 55343
952-935-9922 Home
pierrobill@aol.com

From: [Sarai Brenner](#)
To: [Jacobson, Nani](#)
Subject: Kennilworth corridor comments for supplemental DEIS
Date: Sunday, August 04, 2013 12:36:15 AM

I do not support freight and LRT colocation. Freight was to be temporary through this corridor and continues to be so. It was put along Kennilworth when Hiawatha was modified for light rail, but at the time, the kenwood neighborhood was told that the kennilworth corridor was not ideal for freight, and that as soon as the superfund site was cleaned up in St. Louis Park, it would be moved there. What makes kennilworth ideal now, especially if two additional tracks for LRT are added? Additionally, why would the southwest transit project spend an additional 250 - 450 million dollars on tunnelling light rail to accommodate a temporary train? Kennilworth was promised that if LRT was to go through, the freight would be moved. It is clear that the issue of where freight should go was not considered in the original LPA. I believe that the only fair thing to do is to scrap the original LPA, and first resolve a permanent home for freight and then go back to the LPA process to pick the best route for transit.

Sincerely,
Sarai Brenner

Sent from my iPad

From: [arthur higinbotham](#)
To: [Jacobson, Nani](#)
Cc: [Stuart A Chazin](#); [julieannsabo](#); [Nancy Green](#); [Tom Johnson](#); [info cidna](#); [lisa goodman](#)
Subject: Comments on Supplemental DEIS for SWLRT Transitway
Date: Sunday, August 04, 2013 5:11:22 PM
Attachments: [THE PROBLEMS OF SWLRT IN A SHALLOW TUNNEL IN KENILWORTH.docx](#)

I am attaching a statement showing the shortcomings of a shallow tunnel for the SWLRT in the Kenilworth corridor; I would like to add that a shallow tunnel will be a major safety hazard for children using Park Siding during tunnel construction and for residents who live along the corridor.

I would like to object to the ridership being increased from 29,000 to 34,000-36,000 without any further ridership study when the 2030 basis for ridership should now show a decline due to the Great Recession of 2008-12.

Art Higinbotham
SWLRT CAC Representative

THE PROBLEMS OF SWLRT IN A SHALLOW TUNNEL IN KENILWORTH

1. Construction will close the bike and pedestrian trails for the length of the corridor for 2 years, diverting trail users to dangerous city streets
2. Excavation will close Cedar Lake Parkway, backing up vehicle and pedestrian traffic onto Dean Parkway and W. Lake of the Isles Parkway to the east and Sunset Boulevard to the west
3. Returning to grade to cross the Cedar Lake-Lake of the Isles boat channel will result in 3 bridges over the channel, violating the serenity for users. It will also be counter to the channel designation for the National Historic Register and the environmental requirements of Section 4F
4. During construction, excavation will result in visibility, noise, vibration, and exhaust fume issues for the adjacent residential properties and Park Siding Park
5. After completion, the tunnel will still result in vibration issues for the adjacent residential properties and Park Siding Park
6. During construction, access of emergency fire, medical and police vehicles to the Burnham Boulevard/Park Lane neighborhoods will be restricted and require longer response times
7. The failure of the proposed safety wall between the freight rail line and the LRT tunnel excavation could cause collapse of the 14 story Calhoun Isles condominium tower or a freight train pulling 80 tank cars carrying ethanol or other flammable liquids
8. These issues may cause the SWLRT Project Office to revert to previous plans to take up to 57 residences north of Lake St. and another 20 south of Lake St.
9. The shallow tunnel will still require accommodation of two tracks of light rail, a freight rail track, a trolley connection to Uptown and the Midtown Greenway trails at the W. Lake St. station
10. The shallow LRT tunnel will be subject to periodic flooding during storm incidents if not properly sealed, resulting in interruption of service and a safety hazard to LRT passengers

From: [Douglas Peterson](mailto:Douglas.Peterson)
To: [Jacobson, Nani](mailto:Jacobson.Nani)
Cc: mnrealtors@aol.com; eldonjohn@hotmail.com; docsafari@hotmail.com;
kenilworthpreservationgroup@gmail.com; ahiginbotham@msn.com; bobbemel@mnmicro.net;
michaelwilsonmpls@gmail.com; gail.dorfman@co.hennepin.mn.us; jmcolby@earthlink.net
Subject: Comments - SW Light Rail Transit Extension Project
Date: Sunday, August 04, 2013 9:33:12 PM

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson:

Below are my written comments under the National Environmental Policy Act (NEPA) on the scope of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Extension Project (Formerly Referred to as the Southwest Transitway) (the SDEIS). These comments are submitted on August 4, 2013, within the 20 day period for submitting comments which ends on August 12, 2013. In accordance with the Minnesota Environmental Policy Act (MEPA) these comments, and the responses to them, will be included in the SDEIS.

8-

4-2013

Southwest Corridor Light Rail Transit Extension Project Must Include Deep Tunnel in Kenilworth Corridor or Be Rerouted

A deep tunnel in the Kenilworth Corridor for the Southwest LRT is absolutely necessary to avoid lawsuits by parties affected by the proposed light rail line and the probable loss of federal funding incident to the commencement of any such lawsuit. My wife, Linda, and I own and reside in a townhome in the Cedar Lake Shores town homes. We both bike extensively – 1,000 to 2,000 miles a year. We generally bike on the Kenilworth Trail and the Minneapolis and Hennepin Parks bike trails at least two or three times a week. We also use the Kenilworth Trail three or four times a week to walk to the coffee shops, stores and restaurants located in Calhoun Village and Calhoun Commons.

The City of Minneapolis will not consent to co-locating freight train and light rail train (LRT) traffic on the Kenilworth Corridor. Doing so

would force 30 to 60 families to lose their homes, take away more than one and one half acres of parkland and, while destroying the public's enjoyment of much additional parkland, eliminate the Kenilworth pedestrian/bike trail. The City of St. Louis Park will not consent to relocating the freight rail traffic to run through that city along a new right of way that includes putting the railroad on a berm that runs as high as 20 feet higher than the surrounding property. Minneapolis reluctantly agreed, for purposes of the Southwest LRT Draft Environmental Impact Statement, to have the light rail run along the Kenilworth Corridor only on the condition that the freight traffic would be re-located through St. Louis Park along presently existing right of way.

The freight trains now stop traffic on Cedar Lake Parkway at least one half hour each day. The LRT will send at least 220 trains a day through the corridor. According to light rail experts, the amount of time it takes a light rail train to clear a street crossing, depending on the length of the train, is between 32 and 43 seconds including the time it takes for the signal arms to operate. This means that each day Cedar Lake Parkway will be closed for a minimum of one hour and 45 minutes for light rail and at least a half hour for freight trains. In other words, Cedar Lake Parkway will be closed to rail traffic for at least two hours and fifteen minutes each day in the event of co-location. The Grand Rounds Scenic Byway, of which Cedar Lake Parkway and the Cedar Lake Regional Bike Trail are a part, could lose its national designation of "Grand Rounds Scenic Byway" because of the change in character of the parkway and bike trail. Loss of such designation could result in loss of federal funding to help with future improvements to the Byway.

Twin Cities and Western Railroad, the railroad company that currently leases the tracks and right of way from the Hennepin County Regional Railway Authority, has declared that it would not relocate its rail traffic to St. Louis Park onto the currently existing right of way. It demands that the right of way be reconfigured to run on a 20-foot high berm through the area in which the local high school football stadium is located. The Metropolitan Council is in charge of working with the various cities, governmental agencies, citizens groups, public and private companies and the county, state and federal governments to facilitate, if possible, the construction and operation of a Southwest

Corridor LRT. Because of the impasse created by the railroad, the Met Council has suggested that either a deep tunnel or a shallow covered tunnel could be constructed in the Kenilworth Corridor. A deep tunnel is the only practical solution if the LRT is run through the Kenilworth Corridor.

A shallow tunnel would, at best, require at least one family to lose their home in the neighborhood and would destroy many acres of parkland. Both a shallow tunnel and co-location would create tremendous pedestrian and vehicle safety issues as well as nearly constant noise from LRT bells ringing as the trains approach the West Lake Street station at grade in a heavily residential area. The failure of the Met Council to agree to run the LRT down the Midtown Greenway Corridor, a decision that continues to make less and less sense, has resulted in the City of Minneapolis to plan a trolley service from a point east on that corridor, terminating at the West Lake Street station, to serve the transportation needs of the residents of South Minneapolis that the Met Council refuses to serve. The individuals transferring from the trolleys to light rail would create additional safety problems. A shallow tunnel would also, according to the Met Council, require three years of construction, leaving an ugly scar through Minneapolis parkland.

A deep tunnel, with the freight trains continuing to run through the Kenilworth Corridor (with an upgrade in the rail bed to eliminate the horribly squealing train wheels), while not an ideal solution, would satisfy nearly all of the concerns of the Minneapolis and St. Louis Park residents and of the residents in the greater metropolitan region who use the Kenilworth pedestrian/bike path nearly one million times each year. The Met Council suggests that a deep tunnel would add \$420 million dollars to the originally estimated \$1.25 billion dollar cost of the entire LRT project. If LRT is constructed in the Kenilworth Corridor and the freight trains remain in the corridor, it is money that must be spent. Otherwise, the project must be rerouted, modified at the southwest end or scrapped completely.

The Star Tribune newspaper, in an editorial on August 4, 2013, stated in part:

“The Met Council needs to get it right. Given the high stakes, it should not limit its consideration set to the [eight options](#) that have been developed to address the dispute. Instead, the metro planning agency should consider rethinking the route altogether.

....

“Rising costs may make an alternative route more cost-efficient, especially considering the increasing population density in Uptown and other Minneapolis neighborhoods that could be an alternative to the Kenilworth corridor. This is especially true because under some of the scenarios, the planned 21st Street station in Minneapolis would be eliminated. And the FTA’s cost-effectiveness index has changed under the Obama administration, so what was once considered a less-efficient option may now be looked at more favorably by federal funders....”

A “Counterpoint” article in the Star Tribune newspaper by Mark Wegner, president of Twin Cities & Western Railroad (“Railroad is neutral in LRT dispute,” August 3) confirms the statement in the Draft Environmental Impact Statement (DEIS) that federal regulators consider that the issue of freight-rail location is a separate issue that needs to be resolved by local planners (Metropolitan Council, cities of Minneapolis and St. Louis Park, etc.) before seeking federal funds for LRT. Costs for the resolution of the freight-rail relocation/co-location issue should not be included as a cost for the LRT construction project, but rather as a cost to resolve the freight-rail relocation/co-location issue. Cost of the deep tunnel through the Kenilworth Corridor that resolves the freight issue may be included in the funding for resolving both the LRT rail corridor site and the site for freight-rail location issues, but must not be considered a roadblock to a common sense, responsible plan for construction of LRT through the Kenilworth Corridor.

The Met Council has yet to release its estimates of what must be enormous costs for the huge LRT bridges and two LRT tunnels in Eden

Prairie and Minnetonka. Nor has it released the costs for the three LRT stations and tracks that are planned to extend the LRT southwest of the Golden Triangle station in Eden Prairie. If money is short for a deep tunnel in the Kenilworth Corridor, those three stations, and possibly more, should be eliminated and built at a later date.

It makes absolutely no sense to take away homes and destroy a major part of the nationally acclaimed Minneapolis park and trail system to accommodate a poorly conceived and designed LRT project. If there is not enough money to build it responsibly and correctly from Target Field to the last proposed station in Eden Prairie, the LRT, including a deep tunnel in the Kenilworth Corridor, should be built with the money available only to the proposed Hopkins or possibly the proposed Golden Triangle station in Eden Prairie. Park and ride bus accommodations could be provided for the potential LRT users farther to the southwest until additional money is found to extend the service. Alternatively, the LRT could run down the Midtown Greenway Corridor from the West Lake Street Bridge. This should not be a problem with the Met Council as it has not to date expressed any reservations about changes desired by the railroad, St. Louis Park or Eden Prairie from the “locally preferred” LRT route and design originally agreed to in the Southwest LRT Draft Environmental Impact Statement.

The numerous meetings that I have attended in both Minneapolis and St. Louis Park have made it evident that there is a complete lack of trust by virtually everyone who has attended those meetings of nearly all of the individuals pushing for this light rail project. We are all aware that Met Council led everyone to believe that a tunnel would be constructed through the University of Minnesota campus. At the last minute, the Met Council determined that its “plans” for a tunnel were too expensive. The project was at that time too far along to stop.

If both freight-rail and LRT rails are located within the Kenilworth Corridor, a deep tunnel must be constructed through the Corridor for LRT. If the Met Council does in fact agree to the construction of a deep tunnel in the Kenilworth Corridor, then all relevant planning and construction documents must include binding provisions to the effect that construction of the 1.4 mile deep tunnel and renovation and/or demolition and reconstruction of the West Lake Street Bridge shall be

adequately budgeted and planned for and construction of the tunnel together with work and construction relating to the present or reconstructed West Lake Street Bridge must be substantially completed prior to the time construction begins on any other bridge in the Southwest Light Rail Transit Extension Project. The documentation must also provide that in the event of a violation of such provision, any interested party, including any resident of the state of Minnesota, shall have standing in federal and Minnesota courts of competent jurisdiction to commence and prosecute, without the requirement of posting a bond, an action to restrain construction of any of such other bridges. The Met Council will be watched closely to make sure it completes this project correctly, or perhaps not at all.

Douglas J. Peterson

3315 Saint Paul Ave.

Minneapolis, MN 55416

From: [Raz, Rachel \(WVR, GC\)](#)
To: [Jacobson, Nani](#)
Subject: SitP SDEIS - Scoping comment.docx
Date: Monday, August 05, 2013 10:16:10 PM

August 06, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

The below constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. Note that this comment is post-marked before the published comment deadline of August 12, 2013.

This comment is officially from the neighborhood advocacy group, Safety in the Park, which while led by a steering committee of 7 residents represents perhaps thousands of residents in St. Louis Park MN as evidenced by over 1500 signed petitions supporting our stated cause, an email/blog recipient list of over 1000 individuals, and a Facebook page with over 325 participants. Safety in the Park is not-for-profit, volunteer neighborhood advocacy group based in St. Louis Park, MN.

Safety in the Park supports the SWLRT project as a whole, but rejects the SWLRT proposal to relocate freight rail traffic onto newly built tracks and tracks that were never built for such a purpose. As a group, we have worked on this issue for over three years holding numerous public meetings, meetings with elected officials, and other stakeholders. We know our understanding of the issues and impacts of this project are strong.

Our comments are summarized as follows. The relocation plans named by the SPO (SWLRT Project office) as Brunswick West and Brunswick Central affect St. Louis Park in numerous ways. Before commenting on these effects, Safety in the Park challenges the very nature of the Met Council's decision-making process

Lack of Public Process: For approximately three years, Hennepin County and MNDOT took responsibility for the re-routing of freight trains. During that time, there were numerous opportunities for public process including consultancy led public input meetings, City of St. Louis Park sponsored listening sessions, Hennepin County initiated hearings, a MNDOT EAW (eventually vacated) and a full DEIS. All of the above process featured a re-route option that planned for freight traffic to travel on the original MN&S track in St. Louis Park.

As of approximately two months ago a completely new plan was established, essentially discarding all of the public process that took place for the last three years. (A delay that could have been avoided had Hennepin County reached out to the railroad that would be re-routed earlier.) Since these new plans were introduced no meaningful public process has occurred. On Jun 13 and July 17 and 18 the Met Council held public meetings. The format for public input was inappropriate to the issue presented. At each of these meetings residents were given file cards and sticky notes on which to write comments.

Sticky notes and comment cards do not lend themselves to substantive comments. Comments received in this format cannot be anything but superficial and therefore easily dismissed. Also, without a longer period for comment many in the community could be left out just because they were unavailable at the times designated for comment.

Conspicuous by absence are any public hearings and most importantly any detailed environmental impact study on these new plans. This is particularly disturbing since the decision on these routes is to be made by the Met Council within 30 days of this comment period on the **scope** of this SDEIS and before the SDEIS is complete. It is beyond our understanding how state appointees on the Met Council can make such a decision with no environmental impact study and no hearings from the public. In addition, we do not understand how the FTA, State of Minnesota, and Hennepin County can allow such an impact to be even considered under these circumstances.

Inappropriate consideration of options: In just the last three weeks, the SPO has officially made comments that of all eight options for freight rail relocation/co-location, only three remain as viable--two co-location options and one relocation. The SPO has commented that the following criteria were applied to their culling of the other five alternatives--the taking of property, cost, above ground structures, and community opposition. The remaining reroute option, Brunswick Central ranks higher on this scale of negative impacts than co-location options that have already been removed from consideration. This arbitrary and capricious choice by the SPO does not align with their self-declared criteria.

St. Louis Park City Council/State Legislator/St. Louis Park School Board opposition to re-route options: The St. Louis Park City Council, School Board and Minnesota State Legislators have all sent letters to the Met Council rejecting the Brunswick Reroute options. The continuation of the SPO to consider these re-route options directly challenges a partner municipality and those who represent it.

Therefore, the scope and timeline of this SDEIS should be broad enough and long enough to completely halt the decision-making process underway by the Met Council on the collocate/relocate decision. Anything other than completion of a similar process to the one completed for the original DEIS before these decisions are made is illogical and violates the public's input on this very public project. Furthermore, the following is a list of impacts that will be felt by the City of St. Louis Park should a relocation decision be made. Regardless of the above concerns on public process, the impacts of a St. Louis Park re-route are disconcerting at least, disastrous at most.

Safety: The number one concern of this community is safety. To our point above, no derailment studies have been enacted by the SPO. However, it is common sense that placing a 20 - foot high railroad berm and bridge above an elementary school playground is not a safe choice. There is empirical evidence showing disaster can strike when a train tumbles over an embankment onto structures and people below. This reason alone is enough to remove the re-route option from consideration.

Livability: An elevated structure of the sort planned by the SPO in combination with grade changes and nature of this freight being hauled

will undoubtedly create noise and visual pollution that will make educating and living near the structure near impossible. Again, no studies have been completed on this topic because the SPO has decided not to conduct them before the Met Council makes its decision.

Community Cohesion: This planned elevated structure will create a very permanent physical division in our community.

Mitigation: No mitigation plans have been shared with the public. No funding source has been identified.

For these reasons and more, the SDEIS scope should be changed to include the following:

A detailed analysis of the relocation options that includes: noise and vibration studies, derailments studies, full environmental impacts to all buildings and people within the same geographic scope as the actual LRT path that was studied in the original DEIS.

A robust public process that allows for public hearings and input after the SDEIS is published **BEFORE any decision is made or even considered by the Met Council.** In particular, the specific concerns of the City of St. Louis Park need addressing.

A fair and equal comparison of co-location and relocation must be possible.

Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

Rachel Raz
St Louis Park

From: [julie_sabo](#)
To: [arthur higinbotham](#); [Jacobson, Nani](#)
Cc: [Stuart A Chazin](#); [Nancy Green](#); [Tom Johnson](#); [info cidna](#); [lisa goodman](#)
Subject: Re: Comments on Supplemental DEIS for SWLRT Transitway
Date: Monday, August 05, 2013 9:04:21 AM

Hi Art,

We need to point those things out. The modeling is illusionary, 1,000 a day at 21st Street? When they need more, change the model and wall-a! more riders. It's all crazy.

Julie

From: arthur higinbotham <ahiginbotham@msn.com>
To: nani.jacobson@metrotransit.org
Cc: Stuart A Chazin <Stuart@chazingroup.com>; julieannsabo <julieannsabo@yahoo.com>; Nancy Green <nancygreen1@comcast.net>; Tom Johnson <tom.johnson@co.hennepin.mn.us>; info cidna <info@cidna.org>; lisa goodman <lisa.goodman@ci.minneapolis.mn.us>
Sent: Sunday, August 4, 2013 5:11 PM
Subject: Comments on Supplemental DEIS for SWLRT Transitway

I am attaching a statement showing the shortcomings of a shallow tunnel for the SWLRT in the Kenilworth corridor; I would like to add that a shallow tunnel will be a major safety hazard for children using Park Siding during tunnel construction and for residents who live along the corridor.

I would like to object to the ridership being increased from 29,000 to 34,000-36,000 without any further ridership study when the 2030 basis for ridership should now show a decline due to the Great Recession of 2008-12.

Art Higinbotham
SWLRT CAC Representative

From: [Sean Gilbertson](#)
To: [Jacobson, Nani](#); [Safety In the Park](#); newsroom@mpr.org; stories@minnpost.com
Subject: Re: SDEIS for southwest LRT proposals
Date: Tuesday, August 06, 2013 10:50:36 AM

Any St. Louis Park location should be ruled out before or during the SDEIS because it's a mathematical certitude that any of those options would result in significant negative environmental impacts to the local population.

One of the proposals has an elevated train line passing so close to two large schools that one of the *playgrounds* would have to be destroyed. This is a perfect metaphor for what this proposal would do to our city: effect a deep laceration to our quality of life. We're not going to stand for our houses, our schools, our businesses, and our safety being destroyed or devastated because a few entitled rich people who live hundreds of feet above and away from an existing safe location stamp their feet and demand to get their way. There's nothing different here from what an environmental disaster would do to our neighborhood, except for the fact that we can prevent this disaster.

The people of Kenwood have no stake in this LRT project: they would not be affected by its location in the Kenilworth corridor, and they won't be using it for commuting. This is our project; those of us in the real world could benefit from LRT, but if we damage our communities and our quality of life, we've lost the very thing we're meant to be serving.

Thank you,
Sean Gilbertson
55426

DOUGLAS J. PETERSON
3315 SAINT PAUL AVENUE
MINNEAPOLIS, MN 55416-4317

August 6, 2013



Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Ms. Jacobson:

Below are my written comments under the National Environmental Policy Act (NEPA) on the scope of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Extension Project (Formerly Referred to as the Southwest Transitway) (the SDEIS). These comments are submitted on August 6, 2013, within the 20-day period for submitting comments, which ends on August 12, 2013. In accordance with the Minnesota Environmental Policy Act (MEPA) these comments, and the responses to them, will be included in the SDEIS.

Southwest Corridor Light Rail Transit Extension Project Must Include Deep Tunnel in Kenilworth Corridor or Be Rerouted

A deep tunnel in the Kenilworth Corridor for the Southwest LRT is absolutely necessary to avoid lawsuits by parties affected by the proposed light rail line and the probable loss of federal funding incident to the commencement of any such lawsuit. My wife, Linda, and I own and reside in a townhome in the Cedar Lake Shores town homes. We both bike extensively – 1,000 to 2,000 miles a year. We generally bike on the Kenilworth Trail and the Minneapolis and Hennepin Parks bike trails at least two or three times a week. We also use the Kenilworth Trail three or four times a week to walk to the coffee shops, stores and restaurants located in Calhoun Village and Calhoun Commons.

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Kenilworth pedestrian/bike trail. The City of St. Louis Park will not consent to relocating the freight rail traffic to run through that city along a new right of way that includes putting the railroad on a berm that runs as high as 20 feet higher than the surrounding property. Minneapolis reluctantly agreed, for purposes of the Southwest LRT Draft Environmental Impact Statement, to have the light rail run along the Kenilworth Corridor only on the condition that the freight traffic would be re-located through St. Louis Park along presently existing right of way.

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A shallow tunnel would, at best, require at least one family to lose their home in the neighborhood and would destroy many acres of parkland. Both a shallow tunnel and co-location would create tremendous pedestrian and vehicle safety issues as well as nearly constant noise from LRT bells ringing as the trains approach the West Lake Street station at grade in a heavily residential area. The failure of the Met Council to agree to run the LRT down the Midtown Greenway Corridor, a decision that continues to make less and less sense, has resulted in the City of Minneapolis to plan a trolley service from a point east on that corridor, terminating at the West Lake Street station, to serve the transportation needs of the

residents of South Minneapolis that the Met Council refuses to serve. The individuals transferring from the trolleys to light rail would create additional safety problems. A shallow tunnel would also, according to the Met Council, require three years of construction, leaving an ugly scar through Minneapolis parkland.

A deep tunnel, with the freight trains continuing to run through the Kenilworth Corridor (with an upgrade in the rail bed to eliminate the horribly squealing train wheels), while not an ideal solution, would satisfy nearly all of the concerns of the Minneapolis and St. Louis Park residents and of the residents in the greater metropolitan region who use the Kenilworth pedestrian/bike path nearly one million times each year. The Met Council suggests that a deep tunnel would add \$420 million dollars to the originally estimated \$1.25 billion dollar cost of the entire LRT project. If LRT is constructed in the Kenilworth Corridor and the freight trains remain in the corridor, it is money that must be spent. Otherwise, the project must be rerouted, modified at the southwest end or scrapped completely.

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“The Met Council needs to get it right. Given the high stakes, it should not limit its consideration set to the eight options that have been developed to address the dispute. Instead, the metro planning agency should consider rethinking the route altogether.

....

“Rising costs may make an alternative route more cost-efficient, especially considering the increasing population density in Uptown and other Minneapolis neighborhoods that could be an alternative to the Kenilworth corridor. This is especially true because under some of the scenarios, the planned 21st Street station in Minneapolis would be eliminated. And the FTA’s cost-effectiveness index has changed under the Obama administration, so what was once considered a less-efficient option may now be looked at more favorably by federal funders....”

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location issues, but must not be considered a roadblock to a common sense, responsible plan for construction of LRT through the Kenilworth Corridor.

The Met Council has yet to release its estimates of what must be enormous costs for the huge LRT bridges and two LRT tunnels in Eden Prairie and Minnetonka. Nor has it released the costs for the three LRT stations and tracks that are planned to extend the LRT southwest of the Golden Triangle station in Eden Prairie. If money is short for a deep tunnel in the Kenilworth Corridor, those three stations, and possibly more, should be eliminated and built at a later date.

It makes absolutely no sense to take away homes and destroy a major part of the nationally acclaimed Minneapolis park and trail system to accommodate a poorly conceived and designed LRT project. If there is not enough money to build it responsibly and correctly from Target Field to the last proposed station in Eden Prairie, the LRT, including a deep tunnel in the Kenilworth Corridor, should be built with the money available only to the proposed Hopkins or possibly the proposed Golden Triangle station in Eden Prairie. Park and ride bus accommodations could be provided for the potential LRT users farther to the southwest until additional money is found to extend the service. Alternatively, the LRT could run down the Midtown Greenway Corridor from the West Lake Street Bridge. This should not be a problem with the Met Council as it has not to date expressed any reservations about changes desired by the railroad, St. Louis Park or Eden Prairie from the "locally preferred" LRT route and design originally agreed to in the Southwest LRT Draft Environmental Impact Statement.

The numerous meetings that I have attended in both Minneapolis and St. Louis Park have made it evident that there is a complete lack of trust by virtually everyone who has attended those meetings of nearly all of the individuals pushing for this light rail project. We are all aware that Met Council led everyone to believe that a tunnel would be constructed through the University of Minnesota campus. At the last minute, the Met Council determined that its "plans" for a tunnel were too expensive. The project was at that time too far along to stop.

If both freight-rail and LRT rails are located within the Kenilworth Corridor, a deep tunnel must be constructed through the Corridor for LRT. If the Met Council does in fact agree to the construction of a deep tunnel in the Kenilworth Corridor, then all relevant planning and construction documents must include binding provisions to the effect that construction of the 1.4 mile deep tunnel and renovation and/or demolition and reconstruction of the West Lake Street Bridge shall be adequately budgeted and planned for and construction of the tunnel together with work and construction relating to the present or reconstructed West Lake Street Bridge must be substantially completed prior to the time construction begins on any other bridge in the Southwest Light Rail Transit Extension Project. The documentation must also provide that in the event of a violation of such provision,

any interested party, including any resident of the state of Minnesota, shall have standing in federal and Minnesota courts of competent jurisdiction to commence and prosecute, without the requirement of posting a bond, an action to restrain construction of any of such other bridges. The Met Council will be watched closely to make sure it completes this project correctly, or perhaps not at all.

Yours truly,

A handwritten signature in black ink, appearing to read "Douglas J. Peterson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Douglas J. Peterson

From: bjschmitt89@aol.com
To: [Jacobson, Nani](#)
Subject: Supplemental Draft Environmental Impact Statement for SWLRT
Date: Tuesday, August 06, 2013 12:17:52 PM

August 6, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson:

I am in complete agreement with the statement sent to you by Safety in the Park dated August 6, 2013.

That the Brunswick Central remains as an option remains a mystery to me as it ranks higher on the scale of negative impacts than other co-location options that have already been removed from consideration.

Safety concerns, livability in an area of elevated rail (noise, vibration, nature of freight being hauled) as well as the lack of any mitigation plan or funding source for one makes me request that the SDEIS study should include the following:

1. A detailed analysis of relocation options that includes: noise and vibration studies, derailments studies, full environmental impacts to all buildings and people within the same geographic scope as the actual LRT path that was studied in the original DEIS.
2. A robust public process that allows for public hearings and input after the SDEIS is published **BEFORE** any decision is made or even considered by the Met Council. In particular, the specific concerns of the City of St. Louis Park need addressing.
3. A fair and equal comparison of co-location and relocation must be possible. Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

Bert & Beverly Schmitt
2833 Brunswick Avenue South
St. Louis Park, MN 55416

From: [Karen J. Scott](#)
To: [Jacobson, Nani](#)
Subject: SLP Resident opposes Freight Rail Reroute
Date: Tuesday, August 06, 2013 11:29:02 AM

Hi Ms. Jacobson, I hope you have received numerous emails/ letters Opposing Freight Rail in SLP. I am not as eloquent a writer as those who organized SafetyinthePark! Or Lightraildoneright.org.

Both of these organizations have presented strong arguments for and against re- route and co- location and over the years have essentially opposed each other.

Now these neighborhoods are coming together and stating that if Light Rail happens, then the deep bore tunnel option is the best choice.

We cannot allow the unpredictable number of future riders to outweigh the predictability of events that will occur to St. Louis Park and the environment.

I am, overall, opposed to the entire Light Rail Line as it is stated. I do not stand alone in my concerns. Seriously, if the re-route/colocation is Technical issue #21 then what does that say about this entire plan?

I encourage you to please take into thoughtful consideration the future of St. Louis Park, the community, school district and children and allow that to take precedence over all other decisions. Then secondly, preserve the chain of lakes area and protect our environment. If SWLRT has to happen with the current line proposal, then you have an ethical civic responsibility to oppose any option that creates the most harm. You must protect St. Louis Park's community and the Environment.

Thank you for your time and serious attention to this matter.

Karen Scott
Proud St. Louis Park Community Member



August 7, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

This letter constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit (SWLRT) Project published in the Minnesota EQB dated July 22, 2013. As required, this comment is post-marked before the published comment deadline of August 12, 2013.

I have the following concerns regarding the proposed relocation plans (named by the SWLRT Project Office as Brunswick West and Brunswick Central):

- **Decision Process and Criteria:** The Met Council and SWLRT project team appear to be using arbitrary inconsistent decision criteria for choosing freight route options. They have not published their criteria, yet they approve a tunnel option for Kenwood stating above ground structures would be unsightly, yet an above ground structure is a key part of the St Louis Park options. Also, many years ago discussions started about light rail, and when asked about where freight trains would go, citizens were told those discussions would come later and we would be part of those discussions/decisions. Yet that never happened. Similarly, there are locally preferred alternatives to the location of the light rail itself. Again, the Met Council is choosing to put the trains where ridership is the least, in complete violation of their stated goal to attract young people to the twin cities. Uptown is where ridership is stronger.
- **Safety:** The St Louis Park options are not a safe alternative, give the other options that are or have been on the table. Running long freight trains hauling ethanol, coal and agricultural products at 25mph on an up to 18+foot high berm/bridge through our neighborhood is one thing, but to have it run next to an elementary school, removing that school's playground, within 100 feet of that school building (where babies and toddlers attend ECFE classes 100s of preschoolers attend preschool, and within 500 feet of our High School is not the best choice given there are other options that do not affect babies and children. This should be reason enough to remove the freight re-route option from consideration.
- **Community:** An elevated structure through the heart of St Louis Park is unsightly, and puts a 18+ foot wall in the middle of cohesive, safe, neighborhoods. At a time when the president is asking for neighbors to come together, help each other, and create safe places to work and live, the Met Council is proposing to destroy where that situation actually exists. Our own MN Governor is quoted as saying St Louis Park is one of the safest cities in MN. Our schools are in the top in the nation, and we can boast some of

the strongest neighborhood associations in the state. Our chief of police has been quoted saying neighboring cities have come to them to find out how to replicate what St Louis Park has in terms of its active, involved neighborhood associations. The re-route option would destroy what others hope to replicate, and should be removed from consideration.

- Mitigation: No mitigation plans have been shared with the public to address the above concerns. In fact, at the May 28 unveiling, it was stated that there would be no mitigation.
- Reroute opposition: The St Louis Park City Council, the State Legislator, The St Louis Park School Board have all sent letters to the Met Council rejecting the St Louis Park re-route options. The continuation of the SWLRT Project Office to consider these re-route options directly challenges a partner community municipality and those who represent it.

For these reasons, the SDEIS scope should be changed to include, the following:

A detailed analysis of the full environmental impacts to all buildings and people using the same geographic scope as the actual LRT path that was studied in the original DEIS

The analysis should include, but not be limited to, the following:

- o noise and vibration studies
- o air pollution studies
- o derailment studies
- o visual impact studies

A robust public process that allows for public hearings and INPUT (not just comment cards) BEFORE any decision is made or even considered by the Met Council. The decision made on SWLRT will impact the face of the Twin Cities for generations. It seems prudent to take a thoughtful community involved approach when affecting peoples' homes, lives, schools and tax dollars.



Thank you for your consideration.

Mary Beth Gaines

5740 W Lake Street

St Louis Park, MN 55416

From: [Thatcher Imboden](#)
To: [Gail Dorfman](#); [swlrl](#)
Subject: SW LRT: Trail reroute
Date: Wednesday, August 07, 2013 5:38:31 PM
Attachments: [kenilworth.pdf](#)

Commissioner Dorfman and project planners,

In reviewing a few of the documents pertaining to the Kenilworth corridor and various scenarios where the existing trail may be relocated, I wanted to inquire about another trail reroute option.

I've attached a quick plan I put together outlining a much shorter and potentially more enjoyable reroute than the reroute option that contemplated crossing Lake Street near France Avenue. I biked the route the other day and, while not as nice as the existing Kenilworth, it may be more politically viable and cost effective.

It essentially relocates the trail from just north of the Lake Street bridge then going west along the northwest bridge abutment. Today there is a cow path there and the area is generally sloped perhaps at a 2 to 4% incline in a wooded section. Near the end of the bridge abutment, the path would turn north through a grassy section and proceed onto Chowen Place.

I am assuming that it would cross the freight and light rail tracks at grade with some sort of signaling. Assuming that no laws prevent this type of crossing, I don't see it as any different than bikers having to cross both freight and light rail at grade at Cedar Lake Pkwy or any other number of LRT or freight tracks across this region.

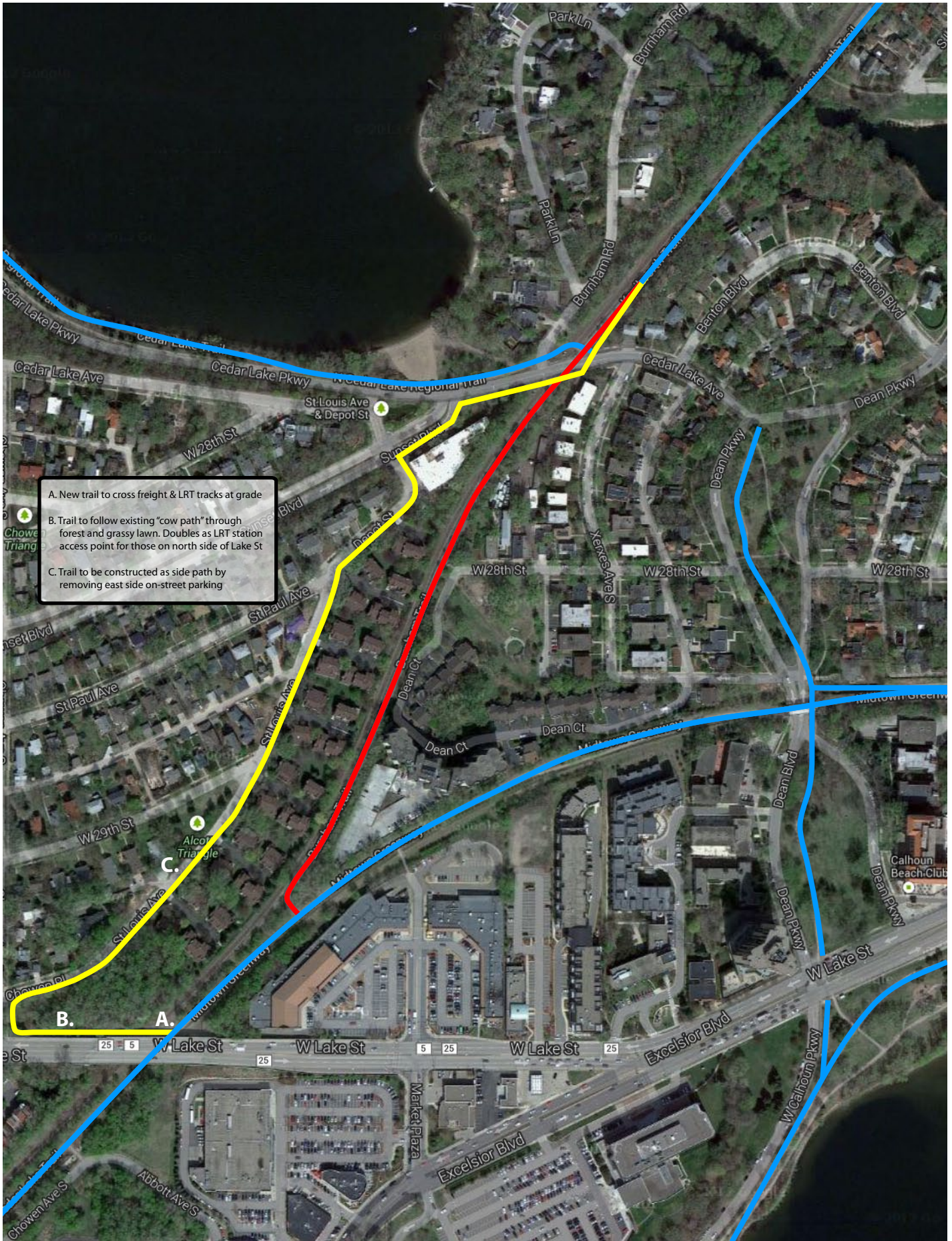
I would assume that the community preference would be to have the street section as a dedicated side path at the top-of-curb height adjacent the street. I would assume that one lane of parking from the east side would need to be removed. Given existing conditions, this may not be that big of a deal relative to other neighborhoods.

It would run along Chowen Place to St. Louis Avenue to Depot Street to Sunrise Blvd. At Sunrise, there is a grassy strip adjacent the apartment building except at the building's entryway. It would then cross at grade across Cedar Lake Pkwy, perhaps on the east side of the RR tracks.

I'm sure this has been considered but hadn't seen it out there, so I thought I'd pass it along just in case. I would love to hear your thoughts.

I'm not sure if I favor this solution or not, but as a biker, it would be far preferable than the other relocation plan.

Thanks,
Thatcher Imboden
thatcher@ouruptown.com
612-810-6642



A. New trail to cross freight & LRT tracks at grade
 B. Trail to follow existing "cow path" through forest and grassy lawn. Doubles as LRT station access point for those on north side of Lake St
 C. Trail to be constructed as side path by removing east side on-street parking

Existing Trails Removed Bike Trails New Bike Trails

From: [Joe King](#)
To: [Jacobson, Nani](#)
Subject: freight trains by SLP school
Date: Wednesday, August 07, 2013 9:30:01 PM
Attachments: [SitP SDEIS - Scoping comment \(1\).docx](#)

I do not support the idea of the freight trains running through SLP by the elementary school. Attached is a letter in regards to this point. I'd be happy to show further support to reconsider or change these plans.

--

[joe king](#)
group account director

[mono](#)
612-454-4909 direct
612-454-4900 main
[mono-1.com](#)

August 06, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

The below constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. Note that this comment is post-marked before the published comment deadline of August 12, 2013.

This comment is officially from the neighborhood advocacy group, Safety in the Park, which while led by a steering committee of 7 residents represents perhaps thousands of residents in St. Louis Park MN as evidenced by over 1500 signed petitions supporting our stated cause, an email/blog recipient list of over 1000 individuals, and a Facebook page with over 325 participants. Safety in the Park is not-for-profit, volunteer neighborhood advocacy group based in St. Louis Park, MN. Safety in the Park supports the SWLRT project as a whole, but rejects the SWLRT proposal to relocate freight rail traffic onto newly built tracks and tracks that were never built for such a purpose. As a group, we have worked on this issue for over three years holding numerous public meetings, meetings with elected officials, and other stakeholders. We know our understanding of the issues and impacts of this project are strong.

Our comments are summarized as follows. The relocation plans named by the SPO (SWLRT Project office) as Brunswick West and Brunswick Central affect St. Louis Park in numerous ways. Before commenting on these effects, Safety in the Park challenges the very nature of the Met Council's decision-making process

- **Lack of Public Process:** For approximately three years, Hennepin County and MNDOT took responsibility for the re-routing of freight trains. During that time, there were numerous opportunities for public process including consultancy led public input meetings, City of St. Louis Park sponsored listening sessions, Hennepin County initiated hearings, a MNDOT EAW (eventually vacated) and a full DEIS. All of the above process featured a re-route option that planned for freight traffic to travel on the original MN&S track in St. Louis Park.
- As of approximately two months ago a completely new plan was established, essentially discarding all of the public process that took place for the last three years. (A delay that could have been avoided had Hennepin County reached out to the railroad that would be re-routed earlier.) Since these new plans were introduced no meaningful public process has occurred. On Jun13 and July 17 and 18 the Met Council held public meetings. The format for public input was inappropriate to the issue presented. At each of these meetings residents were given file cards

and sticky notes on which to write comments. Sticky notes and comment cards do not lend themselves to substantive comments. Comments received in this format cannot be anything but superficial and therefore easily dismissed. Also, without a longer period for comment many in the community could be left out just because they were unavailable at the times designated for comment.

Conspicuous by absence are any public hearings and most importantly any detailed environmental impact study on these new plans. This is particularly disturbing since the decision on these routes is to be made by the Met Council within 30 days of this comment period on the **scope** of this SDEIS and before the SDEIS is complete. It is beyond our understanding how state appointees on the Met Council can make such a decision with no environmental impact study and no hearings from the public. In addition, we do not understand how the FTA, State of Minnesota, and Hennepin County can allow such an impact to be even considered under these circumstances.

- **Inappropriate consideration of options:** In just the last three weeks, the SPO has officially made comments that of all eight options for freight rail relocation/co-location, only three remain as viable—two co-location options and one relocation. The SPO has commented that the following criteria were applied to their culling of the other five alternatives—the taking of property, cost, above ground structures, and community opposition. The remaining reroute option, Brunswick Central ranks higher on this scale of negative impacts than co-location options that have already been removed from consideration. This arbitrary and capricious choice by the SPO does not align with their self-declared criteria.
- **St. Louis Park City Council/State Legislator/St. Louis Park School Board opposition to re-route options:** The St. Louis Park City Council, School Board and Minnesota State Legislators have all sent letters to the Met Council rejecting the Brunswick Reroute options. The continuation of the SPO to consider these re-route options directly challenges a partner municipality and those who represent it.

Therefore, the scope and timeline of this SDEIS should be broad enough and long enough to completely halt the decision-making process underway by the Met Council on the collocate/relocate decision. Anything other than completion of a similar process to the one completed for the original DEIS before these decisions are made is illogical and violates the public's input on this very public project.

Furthermore, the following is a list of impacts that will be felt by the City of St. Louis Park should a relocation decision be made. Regardless of the above concerns on public process, the impacts of a St. Louis Park re-route are disconcerting at least, disastrous at most.

- **Safety:** The number one concern of this community is safety. To our point above, no derailment studies have been enacted by the SPO. However, it is common sense that placing a 20 - foot

high railroad berm and bridge above an elementary school playground is not a safe choice. There is empirical evidence showing disaster can strike when a train tumbles over an embankment onto structures and people below. This reason alone is enough to remove the re-route option from consideration.

- **Livability:** An elevated structure of the sort planned by the SPO in combination with grade changes and nature of this freight being hauled will undoubtedly create noise and visual pollution that will make educating and living near the structure near impossible. Again, no studies have been completed on this topic because the SPO has decided not to conduct them before the Met Council makes its decision.
- **Community Cohesion:** This planned elevated structure will create a very permanent physical division in our community.
- **Mitigation:** No mitigation plans have been shared with the public. No funding source has been identified.

For these reasons and more, the SDEIS scope should be changed to include the following:

- A detailed analysis of the relocation options that includes: noise and vibration studies, derailments studies, full environmental impacts to all buildings and people within the same geographic scope as the actual LRT path that was studied in the original DEIS.
- A robust public process that allows for public hearings and input after the SDEIS is published **BEFORE** any decision is made or even considered by the Met Council. In particular, the specific concerns of the City of St. Louis Park need addressing.
- A fair and equal comparison of co-location and relocation must be possible. Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

From: ggday@aol.com
To: [Jacobson, Nani](#)
Subject: SWLRT comment
Date: Wednesday, August 07, 2013 4:49:21 PM

Dear Ms. Jacobson:

Please put me down as one more person who opposes co-location of freight rail and LRT in the Kenilworth Greenway.

The proposed co-location of freight and LRT (even with the supposed "win-win" of the shallow tunnel which is nothing more than at grade co-location) will permanently damage the unique and valuable regional asset that is the Greenway. There will be safety issues as well as negative environmental impact on the area. (water and air quality, noise and light pollution, wildlife and tree destruction)

The Metropolitan Council must re-consider the alignment of the LRT through the Kenilworth Greenway. It is NOT the only wa

Sincerely,

From: [O'Connell, Pat](#) on behalf of [PublicInfo](#)
To: [Jacobson, Nani](#)
Subject: FW: Letter to Governor Dayton re SW LRT
Date: Wednesday, August 07, 2013 7:14:38 AM
Attachments: [Ltr to Gov Dayton 8-6-2013.docx](#)

From: Douglas Peterson [mailto:douglasjpeterson.djp@gmail.com]
Sent: Tuesday, August 06, 2013 10:35 PM
To: rep.frank.hornstein; Senator Scott Dibble; anita; lisa Goodman; Haigh, Susan; Gail.Dorfman; MNRealtors; jeanette Colby; Munt, Jennifer; EldonJohn; meg forney; peter.rogoff fta; cwreg w; Stuart A Chazin; peter.wagenius; julieannsabo; Shelley; mikeerlandson; Nancy Green; David Lilly; docsafari; kenilworthpreservationgroup; bobbemel; michaelwilsonmpls; thomas.johnson@gpmlaw.com; ahiginbotham@msn.com; abbyruben@earthlink.net; angie_sandeep@yahoo.com; Duininck, Adam; Zachary.Farley@minneapolismn.gov; PublicInfo; O'Connell, Sam; courtneyck@comcast.net
Subject: Letter to Governor Dayton re SW LRT

Attached is a copy of my letter dated 8-6-2013 to Gov. Mark Dayton. The last day to submit comments relating to the proposed Supplemental Draft Environmental Impact Statement (SDEIS) is August 12, 2013. If you have not already sent your written comments, we need to get them in immediately. At least as important, please immediately write to all of the federal, state, county and local politicians and officials who represent Minneapolis and express your views. The possibility of losing "free" federal funds must not be used as an excuse to construct an ill conceived and poorly designed light rail project.

The Federal Transit Administration, has mandated that the Southwest Project Office prepare a supplemental DEIS report. FTA called for this primarily due to three items/changes that were not fully assessed in the original DEIS document related to location of the Operations and Maintenance Facility, Eden Prairie LRT alignments, and freight rail options. If you haven't already, you may want to take advantage of this opportunity to comment on the scope of the Supplemental DEIS. Particularly in regard to both shallow and deep tunnel options, this is an opportunity to make sure the supplemental document studies and responds to the many environmental concerns raised by community members over the past few weeks.

>
> The notice of intent to prepare a Supplemental Draft Environmental Impact Statement was released on July 22 and gave a 20 day period for public comment. [REDACTED]

. Ways to submit public comment:

>
> 1. Send a comment to Ms. Nani Jacobson, Project Manager, Southwest Light Rail Transit Project Office, 6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426, Telephone: [612-373-3808](tel:612-373-3808);
Email: nani.jacobson@metrotransit.org.

>
> 2. Comment are also being accepted online. Post comments via the link below:

>
> <https://www.federalregister.gov/articles/2013/07/22/2013-17506/intent-to-prepare-a-supplemental-draft-environmental-impact-statement-for-the-southwest-light-rail>
>
>

Douglas J Peterson
3315 Saint Paul Ave.
Minneapolis, MN 55416

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DOUGLAS J. PETERSON
3315 SAINT PAUL AVENUE
MINNEAPOLIS, MN 55416-4317

August 7, 2013

The Honorable Mark Dayton
Governor of Minnesota
Office of the Governor
130 State Capitol
75 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

Re: Southwest LRT - Southwest Corridor Light Rail Transit Extension Project Must Include
Deep Tunnel in Kenilworth Corridor, Be Rerouted or Not Built

Dear Governor Dayton:

A deep tunnel in the Kenilworth Corridor for the Southwest LRT is absolutely necessary to avoid lawsuits by parties affected by the proposed light rail line and the probable loss of federal funding incident to the commencement of any such lawsuit. My wife, Linda, and I own and reside in a townhome in the Cedar Lake Shores town homes. We both bike extensively – 1,000 to 2,000 miles a year. We generally bike on the Kenilworth Trail and the Minneapolis and Hennepin Parks bike trails at least two or three times a week. We also use the Kenilworth Trail three or four times a week to walk to the coffee shops, stores and restaurants located in Calhoun Village and Calhoun Commons.

The City of Minneapolis will not consent to co-locating freight train and light rail train (LRT) traffic on the Kenilworth Corridor. Doing so would force 30 to 60 families to lose their homes, take away more than one and one half acres of parkland and, while destroying the public's enjoyment of much additional parkland, eliminate the Kenilworth pedestrian/bike trail. The City of St. Louis Park will not consent to relocating the freight rail traffic to run through that city along a new right of way that includes putting the railroad on a berm that runs as high as 20 feet higher than the surrounding property. Minneapolis reluctantly agreed, for purposes of the Southwest LRT Draft Environmental Impact Statement, to have the light rail run along the Kenilworth Corridor only on the condition that the freight traffic would be re-located through St. Louis Park along presently existing right of way.

The freight trains now stop traffic on Cedar Lake Parkway at least one half hour each day. The LRT will send at least 220 trains a day through the corridor. According to light rail experts, the amount of time it takes a light rail train to clear a street crossing,

depending on the length of the train, is between 32 and 43 seconds including the time it takes for the signal arms to operate. This means that each day Cedar Lake Parkway will be closed for a minimum of one hour and 45 minutes for light rail and at least a half hour for freight trains. In other words, Cedar Lake Parkway will be closed to rail traffic for at least two hours and fifteen minutes each day in the event of co-location. The Grand Rounds Scenic Byway, of which Cedar Lake Parkway and the Cedar Lake Regional Bike Trail are a part, could lose its national designation of "Grand Rounds Scenic Byway" because of the change in character of the parkway and bike trail. Loss of such designation could result in loss of federal funding to help with future improvements to the Byway.

Twin Cities and Western Railroad, the railroad company that currently leases the tracks and right of way from the Hennepin County Regional Railway Authority, has declared that it would not relocate its rail traffic to St. Louis Park onto the currently existing right of way. It demands that the right of way be reconfigured to run on a 20-foot high berm through the area in which the local high school football stadium is located. The Metropolitan Council is in charge of working with the various cities, governmental agencies, citizens groups, public and private companies and the county, state and federal governments to facilitate, if possible, the construction and operation of a Southwest Corridor LRT. Because of the impasse created by the railroad, the Met Council has suggested that either a deep tunnel or a shallow covered tunnel could be constructed in the Kenilworth Corridor. A deep tunnel is the only practical solution if the LRT is run through the Kenilworth Corridor.

A shallow tunnel would, at best, require at least one family to lose their home in the neighborhood and would destroy many acres of parkland. Both a shallow tunnel and co-location would create tremendous pedestrian and vehicle safety issues as well as nearly constant noise from LRT bells ringing as the trains approach the West Lake Street station at grade in a heavily residential area. The failure of the Met Council to agree to run the LRT down the Midtown Greenway Corridor, a decision that continues to make less and less sense, has resulted in the City of Minneapolis to plan a trolley service from a point east on that corridor, terminating at the West Lake Street station, to serve the transportation needs of the residents of South Minneapolis that the Met Council refuses to serve. The individuals transferring from the trolleys to light rail would create additional safety problems. A shallow tunnel would also, according to the Met Council, require three years of construction, leaving an ugly scar through Minneapolis parkland.

A deep tunnel, with the freight trains continuing to run through the Kenilworth Corridor (with an upgrade in the rail bed to eliminate the horribly squealing train wheels), while not an ideal solution, would satisfy nearly all of the concerns of the Minneapolis and St. Louis Park residents and of the residents in the greater metropolitan region who use the Kenilworth pedestrian/bike path nearly one million times each year. The Met Council suggests that a deep tunnel would add \$420 million dollars to the originally estimated \$1.25 billion dollar cost of the entire LRT project. If LRT is constructed in the Kenilworth Corridor and the freight trains remain in the corridor, it is money that must be spent. Otherwise, the project must be rerouted, modified at the southwest end or scrapped completely.

The Star Tribune newspaper, in an editorial on August 4, 2013, stated in part:

The Met Council needs to get it right. Given the high stakes, it should not limit its consideration set to the [eight options](#) that have been developed to address the dispute. Instead, the metro planning agency should consider rethinking the route altogether.

....

Rising costs may make an alternative route more cost-efficient, especially considering the increasing population density in Uptown and other Minneapolis neighborhoods that could be an alternative to the Kenilworth corridor. This is especially true because under some of the scenarios, the planned 21st Street station in Minneapolis would be eliminated. And the FTA's cost-effectiveness index has changed under the Obama administration, so what was once considered a less-efficient option may now be looked at more favorably by federal funders....

A "Counterpoint" article in the Star Tribune newspaper by Mark Wegner, president of Twin Cities & Western Railroad ("Railroad is neutral in LRT dispute," August 3) confirms the statement in the Draft Environmental Impact Statement (DEIS) that federal regulators consider that the issue of freight-rail location is a separate issue that needs to be resolved by local planners (Metropolitan Council, cities of Minneapolis and St. Louis Park, etc.) before seeking federal funds for LRT. Costs for the resolution of the freight-rail relocation/co-location issue should not be included as a cost for the LRT construction project, but rather as a cost to resolve the freight-rail relocation/co-location issue. Cost of the deep tunnel through the Kenilworth Corridor that resolves the freight issue may be included in the funding for resolving both the LRT rail corridor site and the site for freight-rail location issues, but must not be considered a roadblock to a common sense, responsible plan for construction of LRT through the Kenilworth Corridor.

The Met Council has yet to release its estimates of what must be enormous costs for the huge LRT bridges and two LRT tunnels in Eden Prairie and Minnetonka. Nor has it released the costs for the three LRT stations and tracks that are planned to extend the LRT southwest of the Golden Triangle station in Eden Prairie. If money is short for a deep tunnel in the Kenilworth Corridor, those three stations, and possibly more, should be eliminated and built at a later date.

It makes absolutely no sense to take away homes and destroy a major part of the nationally acclaimed Minneapolis park and trail system to accommodate a poorly conceived and designed LRT project. If there is not enough money to build it responsibly and correctly from Target Field to the last proposed station in Eden Prairie, the LRT, including a deep tunnel in the Kenilworth Corridor, should be built with the money available only to the proposed Hopkins or possibly the proposed Golden Triangle station in Eden Prairie. Park and ride bus accommodations could be provided for the potential LRT users farther to the southwest until additional money is found to extend the service. Alternatively, the LRT could run down the Midtown Greenway Corridor from the West Lake Street Bridge. This should not be a problem with the Met Council as it has not to date expressed any reservations about changes desired by the railroad, St. Louis Park or Eden Prairie from the "locally preferred" LRT route and design originally agreed to in the Southwest LRT Draft Environmental Impact Statement.

The numerous meetings that I have attended in both Minneapolis and St. Louis Park have made it evident that there is a complete lack of trust by virtually everyone who has attended those meetings of nearly all of the individuals pushing for this light rail project. We are all aware that Met Council led everyone to believe that a tunnel would be constructed through the University of Minnesota campus. At the last minute, the Met Council determined that its "plans" for a tunnel were too expensive. The project was at that time too far along to stop.

If both freight-rail and LRT rails are located within the Kenilworth Corridor, a deep tunnel must be constructed through the Corridor for LRT. If the Met Council does in fact

agree to the construction of a deep tunnel in the Kenilworth Corridor, then all relevant planning and construction documents must include binding provisions to the effect that construction of the 1.4 mile deep tunnel and renovation and/or demolition and reconstruction of the West Lake Street Bridge shall be adequately budgeted and planned for and construction of the tunnel together with work and construction relating to the present or reconstructed West Lake Street Bridge must be substantially completed prior to the time construction begins on any other bridge in the Southwest Light Rail Transit Extension Project. The documentation must also provide that in the event of a violation of such provision, any interested party, including any resident of the state of Minnesota, shall have standing in federal and Minnesota courts of competent jurisdiction to commence and prosecute, without the requirement of posting a bond, an action to restrain construction of any of such other bridges. The Met Council will be watched closely to make sure it completes this project correctly, or perhaps not at all.

Yours truly,

Douglas J. Peterson

CC: arthur higinbotham <ahiginbotham@msn.com>
rep.frank.hornstein <rep.frank.hornstein@house.mn>; Senator Scott Dibble
<sen.scott.dibble@senate.mn>; anita <anita@robtabb.com>; lisa Goodman
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David Lilly <dlilly@danburygroup.com>;
mnrealtors <mnrealtors@aol.com>; docsafari <docsafari@hotmail.com>;
kenilworthpreservationgroup <kenilworthpreservationgroup@gmail.com>; bobbemel
<bobbemel@mnmicro.net>; michaelwilsonmpls <michaelwilsonmpls@gmail.com>;

From: [Aimee Saloka](#)
To: [Jacobson, Nani](#)
Subject: Opposed to Freight trains by SLP school
Date: Wednesday, August 07, 2013 9:47:44 PM
Attachments: [ATT00001.gif](#)
[SitP SDEIS - Scoping comment .docx](#)

Dear Ms. Jacobsen,

I do not support the idea of the freight trains running through SLP by the elementary school. Attached is a letter in regards to this point. I'd be happy to show further support to reconsider or change these plans.

Thank you,

Aimee Saloka
Project Manager

Phone: 612-217-5074
E-mail: asaloka@us.ibm.com



901 Marquette Avenue
Minneapolis, MN 55402
United States

August 06, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

The below constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. Note that this comment is post-marked before the published comment deadline of August 12, 2013.

This comment is officially from the neighborhood advocacy group, Safety in the Park, which while led by a steering committee of 7 residents represents perhaps thousands of residents in St. Louis Park MN as evidenced by over 1500 signed petitions supporting our stated cause, an email/blog recipient list of over 1000 individuals, and a Facebook page with over 325 participants. Safety in the Park is not-for-profit, volunteer neighborhood advocacy group based in St. Louis Park, MN. Safety in the Park supports the SWLRT project as a whole, but rejects the SWLRT proposal to relocate freight rail traffic onto newly built tracks and tracks that were never built for such a purpose. As a group, we have worked on this issue for over three years holding numerous public meetings, meetings with elected officials, and other stakeholders. We know our understanding of the issues and impacts of this project are strong.

Our comments are summarized as follows. The relocation plans named by the SPO (SWLRT Project office) as Brunswick West and Brunswick Central affect St. Louis Park in numerous ways. Before commenting on these effects, Safety in the Park challenges the very nature of the Met Council's decision-making process

- **Lack of Public Process:** For approximately three years, Hennepin County and MNDOT took responsibility for the re-routing of freight trains. During that time, there were numerous opportunities for public process including consultancy led public input meetings, City of St. Louis Park sponsored listening sessions, Hennepin County initiated hearings, a MNDOT EAW (eventually vacated) and a full DEIS. All of the above process featured a re-route option that planned for freight traffic to travel on the original MN&S track in St. Louis Park.
- As of approximately two months ago a completely new plan was established, essentially discarding all of the public process that took place for the last three years. (A delay that could have been avoided had Hennepin County reached out to the railroad that would be re-routed earlier.) Since these new plans were introduced no meaningful public process has occurred. On Jun13 and July 17 and 18 the Met Council held public meetings. The format for public input was inappropriate to the issue presented. At each of these meetings residents were given file cards

and sticky notes on which to write comments. Sticky notes and comment cards do not lend themselves to substantive comments. Comments received in this format cannot be anything but superficial and therefore easily dismissed. Also, without a longer period for comment many in the community could be left out just because they were unavailable at the times designated for comment.

Conspicuous by absence are any public hearings and most importantly any detailed environmental impact study on these new plans. This is particularly disturbing since the decision on these routes is to be made by the Met Council within 30 days of this comment period on the **scope** of this SDEIS and before the SDEIS is complete. It is beyond our understanding how state appointees on the Met Council can make such a decision with no environmental impact study and no hearings from the public. In addition, we do not understand how the FTA, State of Minnesota, and Hennepin County can allow such an impact to be even considered under these circumstances.

- **Inappropriate consideration of options:** In just the last three weeks, the SPO has officially made comments that of all eight options for freight rail relocation/co-location, only three remain as viable—two co-location options and one relocation. The SPO has commented that the following criteria were applied to their culling of the other five alternatives—the taking of property, cost, above ground structures, and community opposition. The remaining reroute option, Brunswick Central ranks higher on this scale of negative impacts than co-location options that have already been removed from consideration. This arbitrary and capricious choice by the SPO does not align with their self-declared criteria.
- **St. Louis Park City Council/State Legislator/St. Louis Park School Board opposition to re-route options:** The St. Louis Park City Council, School Board and Minnesota State Legislators have all sent letters to the Met Council rejecting the Brunswick Reroute options. The continuation of the SPO to consider these re-route options directly challenges a partner municipality and those who represent it.

Therefore, the scope and timeline of this SDEIS should be broad enough and long enough to completely halt the decision-making process underway by the Met Council on the collocate/relocate decision. Anything other than completion of a similar process to the one completed for the original DEIS before these decisions are made is illogical and violates the public's input on this very public project.

Furthermore, the following is a list of impacts that will be felt by the City of St. Louis Park should a relocation decision be made. Regardless of the above concerns on public process, the impacts of a St. Louis Park re-route are disconcerting at least, disastrous at most.

- **Safety:** The number one concern of this community is safety. To our point above, no derailment studies have been enacted by the SPO. However, it is common sense that placing a 20 - foot

high railroad berm and bridge above an elementary school playground is not a safe choice. There is empirical evidence showing disaster can strike when a train tumbles over an embankment onto structures and people below. This reason alone is enough to remove the re-route option from consideration.

- **Livability:** An elevated structure of the sort planned by the SPO in combination with grade changes and nature of this freight being hauled will undoubtedly create noise and visual pollution that will make educating and living near the structure near impossible. Again, no studies have been completed on this topic because the SPO has decided not to conduct them before the Met Council makes its decision.
- **Community Cohesion:** This planned elevated structure will create a very permanent physical division in our community.
- **Mitigation:** No mitigation plans have been shared with the public. No funding source has been identified.

For these reasons and more, the SDEIS scope should be changed to include the following:

- A detailed analysis of the relocation options that includes: noise and vibration studies, derailments studies, full environmental impacts to all buildings and people within the same geographic scope as the actual LRT path that was studied in the original DEIS.
- A robust public process that allows for public hearings and input after the SDEIS is published **BEFORE** any decision is made or even considered by the Met Council. In particular, the specific concerns of the City of St. Louis Park need addressing.
- A fair and equal comparison of co-location and relocation must be possible. Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

From: [Joel Schou](#)
To: [swlrt](#)
Subject: Some thoughts on the freight rail issue for the Green Line Extension
Date: Wednesday, August 07, 2013 12:49:11 PM

Good afternoon,

My name is Joel Schou. I'm a resident of the Field neighborhood in South Minneapolis, so while the Green Line Extension currently under discussion does not immediately affect or benefit me, I have a general interest in Metro-area transportation policy and execution. That, and I'm a huge train nut who finds LRT fascinating and interesting. I've been following the developments in planning the new line from afar and just have a few small thoughts to share regarding the Kenilworth corridor issues.

First of all, I am not going to harp on the 3A vs. 3C choice. I trust that the original plan made a sufficient case for why the particular alignment was chosen. That said, I think freight relocation is the proper choice, but not in the way that the Met Council is currently studying. I think neither of the considered alignments through St. Louis Park are the right choice; there's too much property taking, street disruption, and splitting of the community due to the huge embankments necessary to accommodate safe curves and grades.

So what do I suggest? I came across a document on the SLP web site discussing the freight reroute (http://www.stlouispark.org/pdf/freight_rail_realignment_study.pdf), with which you are certainly familiar. I realize that the study is >4 years old and the cost estimates have certainly changed, but the former ROW that runs along/near TH 169 (page 16 and Exhibit 8) seems to me to make a tremendous amount of sense. I realize that the cost estimate of \$120MM in 2008 put it far behind the routes currently being studied. However, we've now learned that the MNS sub is far more expensive than the original \$48MM estimate. Given that the current estimates for that alignment are anywhere from \$190MM to \$210MM, the TH 169 route strikes me as awfully competitive even if were to come in as much as 50% higher than its 2008 numbers.

I realize that it has some complications with property taking, road bridges, a freeway, and the new office development at Excelsior and TH 169, but these all seem solvable with less friction than we're experiencing currently. Obviously, there would be a whole new group of people (and a new city) to engage in the discussion, as there is currently nothing but a bike trail running through this corridor. However, the friendlier curves and grades of this route would allow trains to glide silently (relatively, of course) through the neighborhood. The ROW even appears to have enough room to preserve the bike trail next to the freight line, but it's tough for me to estimate that using just satellite imagery.

Thank you for taking the time to read my thoughts on the project. I think that high-quality transit lines are vital to the entire Metro region and I don't want to see this particular line discarded. For that reason, I think that reconsidering the TH 169 freight realignment has the potential to be a great solution. I hope those of you involved in

the decision-making process are willing and able to take another look at the option.
This is a solvable problem. I'll be cheering for you.

Sincerely,
Joel Schou

From: [Brian Z.](#)
To: [Jacobson, Nani](#)
Subject: Response to Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013
Date: Wednesday, August 07, 2013 8:32:58 PM

August 7th, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

The below constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. Note that this comment is post-marked before the published comment deadline of August 12, 2013.

My family owns and lives in the home closest to the MN&S Railroad tracks. The distance of the tracks to our home is 34 feet. In addition, the tracks are on a berm which is approximately 21 feet high. This puts me in the unfortunate position of having the most intimate knowledge of the physical danger, constant disturbance and extreme ugliness and unlivability which would be forced on hundreds of families in the city I love and would quite literally divide the city in half. Perhaps even more offensive, indefensible and disgusting is the Brunswick Central freight re-route plan's blatant disregard for the physical safety and educational needs of pre-schoolers and primary school students at our Spanish Immersion School.

As I have been deeply involved in the fight to stop the re-route for over 4 years, I can vouch for the truth and thoroughness of the SDEIS reply written by the neighborhood advocacy group Safety in the Park. I include their response below for your consideration.

This comment is officially from the neighborhood advocacy group, Safety in the Park, which while led by a steering committee of 7 residents represents perhaps thousands of residents in St. Louis Park MN as evidenced by over 1500 signed petitions supporting our stated cause, an email/blog recipient list of over 1000 individuals, and a Facebook page with over 325 participants. Safety in the Park is not-for-profit, volunteer neighborhood advocacy group based in St. Louis Park, MN. Safety in the Park supports the SWLRT project as a whole, but rejects the SWLRT proposal to relocate freight rail traffic onto newly built tracks and tracks that were never built for such a purpose. As a group, we have worked on this issue for over three years holding numerous public meetings, meetings with elected officials, and other stakeholders. We know our understanding of the issues and impacts of this project are strong.

Our comments are summarized as follows. The relocation plans named by the SPO (SWLRT Project office) as Brunswick West and Brunswick Central affect St. Louis Park in numerous ways. Before commenting on these effects, Safety in the Park challenges the very nature of the Met Council's decision-making process

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- **Mitigation:** No mitigation plans have been shared with the public. No funding source has been identified.

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- **A robust public process that allows for public hearings and input after the SDEIS is published BEFORE any decision is made or even considered by the Met Council.** In particular, the specific concerns of the City of St. Louis Park need addressing.

- **A fair and equal comparison of co-location and relocation must be possible.** Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

Thank you for your careful consideration of this most important issue of physical safety, community and civil engineering.

Sincerely,

Brian, Wing and Zoey Zachek
6108 Minnetonka Blvd.
Saint Louis Park, MN 55438
952-922-9165

Ms Nini Jacobson
Project Manager SWLRT
Suite 500
6465 Wayzata Blvd
St Louis Park, MN 55426



Robert M. Brockway
3145 Dean Court #904
Minneapolis, MN 55416

rmbrockway@comcast.net
August 8, 2013

Reference: Supplemental DEIS Freight rail options for the LRT on the Kenilworth.

There are no good freight rail options unless the LRT is buried under ground.

If the LRT were buried:

- The present freight rail could stay where it is for now.
- There would be no need to try to relocate the freight to St Louis Park.

If the LRT were at grade:

- There is not enough space for the freight, the LRT, and the bike and walking trails unless many homes are removed.
- There would be an effort to move the freight to St Louis Park, over their strong objections.
- The environment of the Kenilworth Trail would be completely destroyed.
 - Two hundred and fifty trains a day.
 - The ugly posts and suspended wiring.
 - The complete separation of the communities on either side of the LRT.
 - The vibration, wheel screech (it's on a curve), station warning bells.
 - The environment at the Cedar Lake South Beach would be destroyed.
 - The environment of the beautiful channel between Cedar Lake and Lake of the Isles would be destroyed. If a tunnel were the ditch and cover type and go over the channel rather than under the channel, the results would be equally as bad.
- Car traffic at Cedar Lake Pkwy would be greatly reduced, forcing more cars to Lake Street.
- Condos and town homes on the south east side would be within 35 feet of the right of way, well less than the FTA minimum standard of 50 feet. The patios of some condos in the high rise building are at the very edge of the right of way, no space at all.

From: ggday@aol.com
To: [Jacobson, Nani](#)
Subject: SWLRT - supplemental DEIS comment
Date: Thursday, August 08, 2013 11:08:12 AM

Dear Ms. Jacobson:

With the newly announced fact that there will be a supplement added to the previous DEIS I would like to see these issues covered:

- * What would the effect of the shallow or deep tunnel be on water quality of the channel and lakes ?
- * How many trees would be destroyed in putting a shallow or deep tunnel in the Kenilworth Greenway?
- * How would wildlife be affected?
- * What will the noise level be--not simply at grade-- but at greater heights (affecting the condo's on the Greenway)?
- * What will the vibration level be on the surrounding town homes, high-rise condo's, and experienced by bikers and walkers?
- * What would the effect be on air quality during and after construction?
- * If freight rail did not move: ditto all above questions as it relates to co-location.

If any of these were not covered in the original DEIS (before a shallow and deep tunnel and co-location were being considered) they should be added now.

Thank you. I hope citizen input is valued and used to make a more thorough investigation of the environmental impact of this project.

Georgianna Day Ludcke



August 8, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobsen,

I wish to comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. I support the opinion that the scope and timeline of this SDEIS should be broad enough and long enough to completely halt the decision-making process underway by the Met Council on the collocate/relocate decision.

I am 100% opposed to the SWLRT proposal to relocate freight rail traffic to St. Louis Park onto newly built tracks and tracks that were never built for such a purpose. The St. Louis Park City Council, School Board and Minnesota State Legislators share my opposition. The relocation plans named by the SPO (SWLRT Project office) as Brunswick West and Brunswick Central affect St. Louis Park in extremely negative, unsafe and unjust ways. For example:

- **Safety:** I understand that no derailment studies have been enacted by the SPO. Placing freight trains on tracks on a 20 foot high berm and close to schools/playgrounds is by any logical way of thinking less safe than having the trains at grade or in tunnels, as in some of the co-location options. A criterion for the co-location options is having trains at grade which makes sense – yet that same standard is not being applied to the re-location options. This is UNJUST and reason enough to remove the re-route option from consideration.
- **Livability:** I live within 500 feet of where these elevated freight trains would be traveling in the re-location plans. I fear that the noise and visual pollution will make living in my home of over 20 years nearly impossible. I understand that no studies have been completed on this topic because the SPO has decided not to conduct them at this time which seems unfair to St. Louis Park residents.
- **Community:** Re-routed freight traffic would divide my award-winning community in two. Doing this would be unjust and unfair to my community.
- **Mitigation:** No mitigation plans have been shared with the public. No funding source has been identified.

Therefore, the SDEIS scope should be changed to include the following:

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- A fair and equal comparison of co-location and relocation must be possible. Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

In addition, I have serious concerns about the integrity of the Met Council's decision-making process to date. On June 13 and July 17 and 18 the Met Council held public meetings. I was at the July 18 hearing. This public process was inadequate for sufficient public input and comment on these re-route plans that were established about 2 months ago. There have been no detailed environmental impact studies on these new plans. **How is the Met Council supposed make a wise and informed decision without this fair public process and environmental information? This is irresponsible.** As I alluded to above, the SPO does not seem to be applying its criteria fairly to all plans (co-location and re-location) – that is: the taking of property, cost, above ground structures, and community opposition. The Brunswick Central option ranks higher on this scale of negative impacts than co-location options that have already been removed from consideration. The SPO should be held to a fair process – across the board - using its own self-declared criteria.

Thank you in advance for taking my concerns into consideration.



Mary Weddle
2667 Alabama Ave South
St. Louis Park, MN 55416

From: weddleml@aol.com
To: [Jacobson, Nani](#)
Subject: scope of SDEIS comment
Date: Thursday, August 08, 2013 11:12:02 AM
Attachments: [8.8.13.to.N.Jacobson.docx](#)

August 8, 2013

Dear Ms. Jacobson,

Please see the attached for my comments on the scope of the SDEIS for SWLRT published in the MN EQB on July 22, 2013. I have serious concerns to share with you. I am also sending you a hard copy of this letter.

Thank you in advance for your careful reading of my input.

Mary Weddle

2667 Alabama Ave So

St. Louis Park, MN 55416

August 8, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobsen,

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Thank you in advance for taking my concerns into consideration.

Mary Weddle
2667 Alabama Ave South
St. Louis Park, MN 55416

From: lewquin@comcast.net
To: [Jacobson, Nani](#)
Cc: [Stephen Quinlivan](#); [Lori Quinlivan](#)
Subject: Supplemental Draft Environmental Impact Statement - Comments
Date: Friday, August 09, 2013 6:59:38 AM

August 9, 2013

Ms. Nani Jacobson

Project Manager, Southwest Light Rail Transit Project Office

6465 Wayzata Boulevard, Suite 500

St. Louis Park, MN 55426

Via Email: nani.jacobson@metrotransit.org.

Dear Ms. Jacobson:

We are homeowners at Calhoun Isles, a large condominium and townhouse association that will be adjacent to the proposed Southwest Light Rail Transit Extension (SWLRT) Project. The purpose of this letter is to submit comments under the National Environmental Policy Act and related state and federal laws on the scope of the Supplemental Draft Environmental Impact Statement.

We believe at grade co-location of freight traffic and light rail along the Kenilworth Corridor will have adverse impacts on the environment and the quality of life of near-by residents.

Some of the reasons include:

- Loss of homes by residents
- Impairment and elimination of parkland and trails along the Kenilworth trail
- Constant noise and vibration
- Traffic congestion at the crossing at Cedar Lake Parkway
- Safety concerns for vehicles and pedestrians

The only responsible solution to mitigate the adverse impacts of Light Rail is a deep tunnel. It is the only solution that accommodates the needs of SWLRT, the current freight train operator; Twin Cities and Western Railroad, and the interests of residents.

Other solutions do not properly mitigate the adverse impact of the project. A shallow tunnel still results in noise and vibration and will create pedestrian and vehicle safety issues.

Because of its close proximity, Light Rail will have a disproportionate impact on Calhoun Isles.

This solution is important for the residents of the Calhoun Isles community. Thank you for the opportunity to submit these comments.

Very truly yours,

Steve and Lori Quinlivan

3141 Dean Court #704

Minneapolis, MN 55416

Email: lewquin@comcast.net



August 9, 2013
Ms. Nani Jacobson
Project Manager, Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson:

We feel the Metropolitan Council's Design Option for a deep bore tunnel through the Kenilworth Corridor with an underground West Lake Street Station best meets these three objectives for light rail:

- Preserving the Kenilworth Corridor as a "Natural Regional Resource"
- Insuring pedestrian, bicyclist, and vehicle safety
- Maintaining the area's quality of life

Respectfully yours,
Dr. & Mrs. Nicholas Shuraleff
3134 Dean Court
Minneapolis, MN 55416
Email: shuraleff@gmail.com

From: [Bob Bemel](#)
To: [Jacobson, Nani](#)
Cc: jennifer.orourke@minneapolismn.gov; peter.wagenius@minneapolismn.gov; seantordibble@gmail.com; [Ginis, Sophia](#); betsy@betsyhodges.org; swcorridor@hennepin.mn.us
Subject: SW LRT comments
Date: Saturday, August 10, 2013 12:27:50 PM

Dear Ms Jacobson. I have been following the SW LRT planning and recent public communication about this significant project with great interest. Living within feet of the current freight rail tracks and proposed light rail line gives me direct and heightened interest. As Gail Dorman stated in her article in the Tribune last week, there "are losers, and winners" in projects of this magnitude, with so many interested parties affected. I am one. Living so close to the tracks, within "feet", I fear I will be one of the losers. Can you, or do you think any of your planners, engineers, administrators, imagine, having your bedroom window, your deck, your living room window, within very close proximity, to over 200 trains passing each day. Every 3 minutes during rush hour twice per day, and, running for 20 hours per day. With my home being directly opposite the proposed W. Lake Street station I would be with easy earshot/hearing, of the bells required of the trains as they enter and exit the station. Auditory, and visual pollution is what I imagine, in what is now a pastoral setting in the city. I am directly also on the greenway, and enjoy walking the trails daily and watching the bikers and walkers pass by. I wondered how it could be possible that the distance now determined allowable between the center of the tracks, and dwellings could have been reduced from 24 to 15 feet? 15 FEET!!!! This is some kind of cruel joke. Just a month ago when I learned at the most recent meetings that my building was identified for a possible buy out, this, seemed reasonable! It appeared that my quality of life was being considered, even though I would prefer NOT to leave my home. I have loved living there. So, please, please, seriously consider, and choose, a deep bore tunnel. If this route continues to be the chosen route, to preserve a quality of life that has given the city of Minneapolis, and residents like me a quality of life that is nationally recognized, and, individually appreciated, by myself, and thousands of others! Thank you in advance for taking my opinions into consideration. My fear though, that you and the other decision makers are heading off a cliff. That will negatively impact the quality of life in Mpls. You should know that I am a believer in the needs for mass transit, to efficiently move people in cities. I have traveled the world extensively and have ridden such transit. From subways in New York, Mexico City, Tokyo and London. Implementing such transit in our area is your challenge. I know you must balance quality of "living", with transit needs. Please do this with wisdom!

If decisions are made that I do not consider "wise" I will oppose them. Including lawsuits, if that is my only resort. And I would work politically to defeat politicians who would make adverse decisions. With time, and money.

I feel that strongly about what is transpiring.

Bob Bemel
3066 Lake Shore Drive
Mpls 55416
Lakes CitiHomes

_____ Information from ESET NOD32 Antivirus, version of virus signature database 7403 (20120820) _____

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

From: [Zack Ellsworth](#)
To: [swlrt](#)
Subject: Comment on the SW LRT
Date: Sunday, August 11, 2013 11:10:21 PM

Hello,

I am currently an urban planning grad student at MSU Mankato and as such will soon be joining the ranks of professional planners as a planner or consultant. A recent article in Twin Cities Daily Planet has brought to my attention how off track, pardon the pun, the current alignment for the SW Light Rail favored by the Met Council is. I have detailed my criticisms here on my blog, which can be found here <http://daydreamemporium.wordpress.com/2013/08/11/the-daydream-alignment-what-the-southwest-corridor-light-rail-should-be/> , as well as provided my alternative alignment which I feel would be much more successful and better serve the people of the southwest Metro.

Thank you for taking the time to read what I have to say and consider the points I raise.

Sincerely,
Zack Ellsworth

From: horizongreen@comcast.net
To: [Jacobson, Nani](#)
Subject: Comment Submitted fo SDEIS
Date: Sunday, August 11, 2013 10:27:18 PM
Attachments: [SDEID Submission Shannon Green.docx](#)

Dear Nani:

Please include my attached comment in the Supplemental DEIS for the SWLRT. I am submitting this comment prior to the August 12, 2013 deadline. Please let me know by return email if you need any additional information from me or if this needs to be in any different format.

Thank you.

Sincerely,

Shannon Green
3429 St. Louis Avenue
Minneapolis, MN 55416
612-928-4871 Home
horizongreen@comcast.net

Related to Technical Issue #21, the SWLRT Shallow Tunnel option is portrayed deceptively—it is co-location of freight rail and LRT lines, with significant safety and livability issues for Minneapolis. Two LRT lines and the freight line would be co-located north of the Lake Street Bridge, to the juncture of the Kenilworth and Midtown Corridors, at the tightest point in the entire SWLRT, with only feet to the closest residences. Bells would be sounded for safety each time a train enters or leaves the tunnels, every 3-1/2 minutes, with noise echoing into the surrounding Cedar-Isles-Dean neighborhood, increasing the number of homes impacted. There is no room at this narrowest of pinch points for adequate noise mitigation for the sound of the bells.

With this option, freight rail is proposed to continue in the Kenilworth Corridor, despite not complying with the federal standard of 25 feet from center of the rail to nearest structure. The President of TC&W Railroad has asked for “shared liability,” indicating his awareness that this option is not safe and limiting TC&W liability if people are killed or homes destroyed. It is clearly in TC&W’s best financial interests not to have to relocate.

Without changes, the Shallow Tunnel is not an option. The Shallow Tunnel option could work for our area if livability and safety are addressed: extend the tunnel back to Lake Street, eliminating the need for extra neighborhood bells in addition to nearby station bells, and implement freight safety solutions such as an inner rail guides and frequent third-party inspections of rails and railcars to increase safety and prevent derailments. Similar ideas should be explored for crossing the Kenilworth Channel to address noise issues at that end of the tunnels. With changes, the Met Council could offer a medium-cost option, with improved neighborhood and bike/walking trail aesthetics, which would provide a better solution than running the LRT at grade and relocating the freight rail into neighboring St. Louis Park. While costs need to be managed to allow funding for other transit priorities, a counterpoint is that we need to do fewer projects and do each one right.

From: [Robert Corrick](#)
To: [Jacobson, Nani](#)
Subject: Comments for Supplemental DEIS
Date: Monday, August 12, 2013 4:28:43 PM

To: Metropolitan Council

Nani.jacobson@metrotransit.org

Ms. Nani Jacobson, Project Manager

Southwest Light Rail Transit Project Office

6465 Wayzata Boulevard, Suite 500

St. Louis Park, MN 55426

I have the following comments on the supplemental DEIS for SW LRT:

(1) Some sort of shallow tunnel or similar mitigation seems essential if freight is to stay in the corridor. The proposal at Jones Harrison in July fell short of the city's mitigation requirements. To keep freight in the corridor, LRT should be underground or covered. This means that the channel crossing could be covered and sound insulated. The bike trail could proceed on top of the cover if there is not room at the channel; i.e., the trail could rise gradually on the "roof" of the cover as the LRT proceeds over the channel. The bike trail might proceed to the side of a covered crossing if there was enough room. Any covered crossing should be treated aesthetically with attractive design and vines, etc. Of course, the LRT might proceed under the channel to solve this problem and meet the co-lo objections of the city, but I am sure that you have already considered this option. A covered bridge (old fashioned) is another possibility, but it seems that it would be a very long one (1000 feet or so).

2) In the July Jones Harrison presentation, you proposed the shallow tunnel emerging 1000 feet north of 21st St. It should be noted that the bike trail could be routed to the south at this point to preserve tranquility of the trail. The Kenilworth Corridor is quite wide at this point. So it seems co-lo at grade could happen in this section of the Kenilworth. Perhaps at-grade co-lo should happen a little beyond 1000 feet because there are still homes to be seen on the south side of the corridor at this point.

3) I would strongly encourage solution for the Cedar Lake Trail bike crossing (the

"confluence"). Some sort of bridge seems to be in order for the bike crossing.

I would strongly recommend a solution for the dangerous bike trail crossing at Cedar Lake Parkway.

4) To the extent that the LRT emerges from the shallow tunnel to the north of the Lake Street Bridge, I would strongly recommend a solution to the co-lo that would happen there. Perhaps another cover would be in order.

5) Provision must be made for connection with the Midtown Greenway Streetcar somewhere around the West Lake Street Station. Much has been made of this issue, but it seems that there must be a solution.

6) A wilder idea, which might solve de-watering problems, and cost less, is a "High Line" type of structure (à la New York City High Line) from the West Lake Street station to somewhere north of 21st St. The bike trail could proceed on an attractively designed trail on a "roof" of an LRT cover, which would sound insulated. This structure could be partially buried most of the way except of course for the channel crossing.

7) When the LRT emerges from a shallow tunnel or "High Line" type of structure north of 21st St., consider placing the LRT in a depression (like the Midtown Greenway) so that the 250 daily trains are heard less by trail users, homes, etc. Surround by landscaping.

8) Of course, we would not be talking about a lot of this mitigation if it were not for co-lo. Met Council is asking a lot to put both in the same corridor.

As a side comment, Met Council should be more proactive in proposing solutions that would be acceptable to the City and neighbors. Public relations is pretty terrible at the moment. I would also recommend a more direct connection with some trusted neighborhood representatives through this final process. But perhaps this is just not possible considering the negative campaigning that is going on.

Please feel free to contact me with questions. Let's make this deal happen.

Robert Corrick

2816 West Lake of the Isles Parkway

Minneapolis, MN 55416

612.927.5599

robertcorrick@mentorplanet.com

From: [O'Connell, Sam](#)
To: ["Robert Corrick"](#); [Loring, Deborah](#); [Eiler, Stephanie](#); [Ginis, Sophia](#)
Cc: [SPODMC](#); [Jacobson, Nani](#)
Subject: RE: SW LRT Supplement DEIS Comment
Date: Monday, August 12, 2013 4:49:38 PM
Attachments: [image001.png](#)
[image002.gif](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.gif](#)

Thank you. Nani is receiving all e-mails regarding the SDEIS and yours has been received by the project office.

EMAILLOGO.png



Sam O'Connell, AICP

Manager | Public Involvement
sam.oconnell@metrotransit.org
P. 612.373.3815 | F. 612.373.3899
Southwest LRT Project Office
6465 Wayzata Blvd., Suite 500 | St. Louis Park, MN | 55426 | swlrt.org



From: Robert Corrick [mailto:robertcorrick@mentorplanet.com]
Sent: Monday, August 12, 2013 4:35 PM
To: Loring, Deborah; Eiler, Stephanie; O'Connell, Sam
Subject: SW LRT Supplement DEIS Comment

My email to Nani Jacobson stated that she was out of the office even though Supplement DEIS Comments are due today, so I am sending my comments to you as well.

Thank you.

To: Metropolitan Council

Nani.jacobson@metrotransit.org

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

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(1) Some sort of shallow tunnel or similar mitigation seems essential if freight is to stay in

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Please feel free to contact me with questions. Let's make this deal happen.

Robert Corrick
2816 West Lake of the Isles Parkway
Minneapolis, MN 55416
612.927.5599
robertcorrick@mentorplanet.com

From: [John Doe](#)
To: [Jacobson, Nani](#); [Jacobson, Nani](#)
Date: Monday, August 12, 2013 11:57:11 PM

I would like to include in the scope of the SDEIS the removal of park and ride lots that are now not being proposed by Met Council. It is my understanding that the engineers do not want to have a park ride at the 21st station which my neighborhoods wants to see.

I also wanted to say that it was nearly impossible to find where to send this comment. There is no notice on the Met Council website. It is as if you do NOT want anyone to find out how to comment. I commented on teh scope of the DEIS and could find everythign really easy.....JD

From: dougildner@aol.com
To: [Jacobson, Nani](#)
Subject: Comments on SDEIS SWLRT
Date: Monday, August 12, 2013 12:01:15 AM

Dear Ms. Jacobson,

Because significant changes have occurred since the publication of the DEIS and the selection of the Kenilworth Corridor as the LPA (May 2010) I am writing with several questions and comments.

It would appear that the Project Goals are not being met, even with the solutions offered. The cost increase over budget, the unsatisfactory answers as to how to protect the quality of life, protect the environment and provide a cost effective travel option would indicate that the project needs more work.

If indeed, the Kenilworth Corridor is the best alternative, then the only acceptable solution is a Deep Bore Tunnel. How can this be accomplished without massive budget increases? Are the numbers presented in the Cost Estimate Summary correct? Are the comparisons of all solutions being presented fairly...ie: contingency budget, cost of stations, mitigation, groundwater systems cost etc. included in all design option costs? Why must the West Lake Street Bridge be demolished in this plan? Has the option of a single LRT track through the corridor option been explored? What about introducing a Minimum Operating Segment within the DEIS, thus allowing the best alternative, the deep tunnel, to be built?

Perhaps the project, which recently the Met Council Chair, Susan Haigh acknowledged appeared rushed, needs to re-open Scoping. The choice of the LPA might have been different had the relocation of the freight line been included as part of the project (see Scoping Summary Report "Issues outside of the DEIS.") This would also address the critique that the LPA ignores the transit needs of denser areas and could open the opportunity to explore an alignment running N. along HW 100 and E along HW 394, which was not considered in the earlier preferred alternatives.

There are many issues that have not been fully addressed and many questions that have not been answered. Most constituencies agree that all modes at grade, would be unsafe and negatively impact the neighborhoods, parks, and Grand Rounds Historic District that are part of or adjacent to the Kenilworth Corridor. It would also result in many many homes being taken. The Deep Bore Tunnel option would solve these problems and eliminate the Freight Rail re-location issue. It would also positively impact the construction process, causing less disruption to neighborhoods and traffic during this phase of the project. However, the engineers have not adequately addressed the levels of noise and vibration or the risk of potential settlement of adjacent buildings should the Deep Bore Tunnel be used. These are but a few of the issues that require further study.

I recognize the importance of keeping the project on schedule. However, in order to fully present the options and impacts of the various alternatives, I believe more time is needed. It is also possible, that on closer inspection the LPA will prove to be less acceptable and a new and much better alternative will emerge.

Thank you,
Gretchen Gildner

From: mnrealtors@aol.com
To: [Jacobson, Nani](#)
Subject: What the supplemental DEIS should cover
Date: Monday, August 12, 2013 4:57:33 PM

To whom it may concern:

I invite you all to re-read Chapter 1 of the DEIS...Purpose and Need...in particular 1.4 (pages 13 and 14) and ask **you (in the S-DEIS) to hold yourselves accountable to your Project Goals and Objectives**, in particular the following items:

1.4 Project Goals and Objectives

- 3) Protect the environment
- 4) Preserve the quality of life in the study area and the region

Goal 1: Improve mobility

- *Provide a travel option that enhances pedestrian and bicycle activity...* Running LRT and/or both LRT and freight along the Cedar Lake Trail/Kenilworth Trails, per the DEIS, has severe negative environmental impacts ("added negative visual and noise impacts where previously there were none", taking the area from that of "sounds of birds and recreation" to that of "constant noise levels over the HUD unacceptable livability level", removing the existing developed greenery and trees with no planned mitigation). Hopefully you are aware that nearly \$1m bicyclists and pedestrians use the Cedar Lake Trail/Kenilworth Trail annually...with 30 % of the bicyclists using these trails as their preferred means of transportation year round. In addition, the Cedar Lake Trail is the first Federally designated Bicycle Highway. That designation draws not only tourists from around the world, but bicyclists from other regions of the twin cities. The Kenilworth section of the Cedar Lake Trail is THE connective trail for Regional Trails to the Grand Rounds...another major tourist and suburbanite draw. Consistent with your Goal #1, address in the S-DEIS how the Cedar Lake Trail/Kenilworth Trail will not only remain as they are currently environmentally, but ENHANCED to ENSURE bicycle and pedestrian transit use and activity.

Goal 3: Protect the environment

- *Provide a travel option that protects natural resources including fish, wildlife habitat and water quality.* Per Goal #3, address in the S-DEIS a plan for mitigation to ENSURE protection of natural resources along the Cedar Lake Trail/Kenilworth Trail, the Grand Rounds, and Cedar Lake. Address guidelines which include consultation with affected neighborhoods, communities, the Park Board, and the City of Minneapolis for acceptable mitigation.

Goal 4: Preserve and protect the quality of life in the study area and the region

- *Provide a travel option that ensures fair distribution of benefits and (ensures fair distribution of) adverse effects of the project for the region, communities, and neighborhoods adjacent to the project area.*

Per the DEIS, the section of LRT between the West Lake Station and 21st Station had the most severely impacted property of the entire SWLRT line. However, as the SWLRT budget grows, the \$\$\$ portion for Mpls is under debate and scrutiny, and even has been suggested to drop lower. Mitigation of co-location or LRT at grade for this area is unacceptable and goes completely against Goal #4. Address in the S-DEIS how you will achieve Goal #4 for the section of SWLRT between West Lake Station and 21st Station without co-location or LRT at grade.

Finally, as the DEIS quotes numerous times "connecting the Southwest Suburbs and downtown"; documents the need for "rail transit from the Southwest Suburbs to downtown" because of the declining mobility in the southwest suburbs"; expresses that the jobs are 1) downtown Mpls, 2) Golden Triangle,

3) Opus, 4) Eden Prairie Center, 5) Excelsior Grand. However, the same "connection" or "need" or "job growth areas" are NOT made in relation to Minneapolis and downtown or the Southwest Suburbs. As the SWLRT need seems to be Southwest suburbs to downtown Minneapolis, please address the obvious in the S-DEIS. Address a different LRT route other than going through Minneapolis/Cedar Lake. Address the possibility of a streetcar connecting LRT in St. Louis Park to Uptown, and then on to the Hiawatha Line.

Thank you for your considerations,

Cheryl LaRue
LRT Done Right
Kenilworth Alliance

From: ggday@aol.com
To: [Jacobson, Nani](#)
Subject: Supplemental DEIS questions
Date: Monday, August 12, 2013 4:00:25 PM

Dear Ms. Jacobson:

As this is the last day to get in comments/questions for the supplemental DEIS I am sending you the following:

1. In 2010 MnDOT issued a "negative declaration" in response to whether a full blown EIS would be needed for the freight rail re-route to St. Louis Park meaning that they did not feel it was necessary to analyze the environmental impact because there would be nothing significant to report. Why is the re-route now considered to be a problem? What changed?
2. Previously in the DEIS process the RR said the Kenilworth Greenway did not meet safety standards for the industry. What happened to the results of those studies?
3. What safety standards were referenced by the RR that indicated it could not agree to heavy freight in Kenilworth Greenway?
4. There will clearly be significant impact if heavy freight and LRT are both allowed to go through Kenilworth Greenway:
 - a. Parkland will be not just disrupted but destroyed (trees removed, wildlife habitats destroyed)
 - b. Quality of life will be significantly downgraded (noise, air, light pollution).
 - c. Safety on trails and crossings will become a serious issue.
 - d. Traffic patterns around Dean Parkway and on Cedar Lake Parkway where there are already problems will be made chaotic.
 - e. Hazardous materials being carried by heavy rail through this neighborhood already pose potential danger.
 - f. Crossing accidents are more likely to occur with three rails carrying trains of different weight and speed.

The effect of co-location must be more thoroughly investigated in light of these factors.

5. Hennepin County purchased the Kenilworth Greenway for transit but not for heavy rail. Heavy rail was always meant to be a temporary solution. What has changed?
6. With co-location there would be times when both heavy and light rail would pass each other. When heavy rail is carrying toxic material how can assurance be made that any kind of potential accident would not be significantly dangerous to a large number of people traveling by LRT?

I look forward to seeing the answers to these questions among others included in any

supplement to the DEIS.

Georgianna Day Ludcke

From: [Judy Meath](#)
To: [Jacobson, Nani](#)
Subject: Comment on scope of supplemental DEIS
Date: Monday, August 12, 2013 8:19:32 PM

Dear Ms. Jacobson,

I recommend that the supplemental DEIS for the SWLRT answer the following questions:

1. Concerning the social and economic impact of shallow tunnel in Kenilworth corridor: Will potential future transit projects such as streetcars on the Midtown Greenway be able to connect to a shallow tunnel, where the Midtown Greenway meets the Kenilworth corridor? Transit experts tell me a shallow tunnel will create serious problems for future transit connections.
2. Please also investigate the impact of construction of a shallow tunnel on flora and fauna in the area, and on the water table.
3. Will light rail in the Kenilworth corridor create a barrier between St. Louis Park and Minneapolis?
4. Since a majority of people who work in downtown Minneapolis live in Minneapolis, and since the SWLRT is not going to serve the heavily populated Uptown neighborhoods, how will the SWLRT make economic sense?

Thank you for the opportunity to contribute my ideas to the scope of the supplemental DEIS for the SW LRT alignment.

Sincerely,

Judy

Judy L. Meath
2700 Kenilworth Place
Minneapolis, MN 55405
Home: 612-925-1771
Cell: 612-360-3445

From: [Douglas Peterson](#)
To: [Haigh, Susan](#)
Cc: [MNRealtors](#); [EldonJohn](#); [Richard Logan](#); [STUART CHAZIN](#); [ahiginbotham@msn.com](#); [Bob Bemel](#); [michaelwilsonmpls](#); [gail.dorfman@co.hennepin.mn.us](#); [courtney Kiernat](#); [Sara Gurwitch](#); [hdevoto@hotmail.com](#); [crannon4@gmail.com](#); [odajos@hotmail.com](#); [burke-john.e@gmail.com](#); [Heid Erdrich](#); [info@cidna.org](#); [ltruckenbrod@gmail.com](#); [campbellindeke@comcast.net](#); [jalcarroll@msn.com](#); [appleman.michael@gmail.com](#); [Sandeep Patel](#); [borgessi@hotmail.com](#); [anne_graham@caryacademy.org](#); [clindeke@rrtlarchitects.com](#); [Marya Morstad](#); [Julie Darst](#); [loudesjardins@aol.com](#); [farra005@umn.edu](#); [smfstan@gmail.com](#); [larrymoran1955@gmail.com](#); [marshajf@gmail.com](#); [sarahkennedy63@gmail.com](#); [mmc_1963@hotmail.com](#); [Sara Brenner](#); [Jennifer & Mark Labovitz](#); [mark.labovitz@comcast.net](#); [esthermullen@gmail.com](#); [mickman@stolaf.edu](#); [annikagutzke@gmail.com](#); [cherdesign@aol.com](#); [haleyking@gmail.com](#); [pj.guernsey@comcast.net](#); [Bill Lewis](#); [dgutzke@earthlink.net](#); [ruthjones73@gmail.com](#); [cwreg w](#); [docgarden@comcast.net](#); [mtelfer@keyindicators.com](#); [cburkefl@yahoo.com](#); [emcconaghay@keyindicators.com](#); [jmcommerford@hotmail.com](#); [joel.tyler.carlson@gmail.com](#); [graham.francors@gmail.com](#); [Zoe & Gram Francois](#); [Jim & Cindie Smart](#); [Bryce Hamilton](#); [Donna Hamilton](#); [zookeeper@thelocalbar.com](#); [betsyrhowe@gmail.com](#); [kristi.granacher@gmail.com](#); [laurel@betsyhodges.org](#); [Jim & Cindie Smart](#); [kreidkel@att.net](#); [elarsson@att.net](#); [ryan@ryanfox.com](#); [kbcram@yahoo.com](#); [Nancy Crocker](#); [cindy.marsh2588@gmail.com](#); [bjmmurphy@msn.com](#); [smurphy612@gmail.com](#); [volleyballstar306@gmail.com](#); [agreen4@comcast.net](#); [Sally Rouse](#); [cindacollins@comcast.net](#); [jan.nielsen61@gmail.com](#); [bjrasmus@comcast.net](#); [dgporter2@comcast.net](#); [docaloo@aol.com](#); [bsdprg@hotmail.com](#); [Dorothy Childers](#); [bjwillette@hotmail.com](#); [rsdye20@hotmail.com](#); [jel@dpu.dk](#); [luckylashlarue@gmail.com](#); [meixi@hotmail.com](#); [lorielizabeths@gmail.com](#); [scott.harris@leonard.com](#); [gail@mighty-fine.com](#); [ypolydorow@gmail.com](#); [rnoel@varde.com](#); [lisanoel67@gmail.com](#); [robertcorrich@motorplanet.com](#); [rhudedg@yahoo.com](#); [duffyfitz@mac.com](#); [kendall@umn.edu](#); [Lara.miklaseurs@gmail.com](#); [doug@limonfineart.com](#); [Dan & Barb Schmiechen](#); [thomas.johnson@gpmlaw.com](#); [hccra@co.hennepin.mn.us](#); [Kozlak, Connie](#); [Elmer, Steven](#); [PublicInfo](#); [swlrlt](#); [Brimeyer, James](#); [sen.terri.bonoff@senate.mn](#); [rep.steve.simon@house.mn](#); [peter.wagenius@minneapolis.mn.gov](#); [Duininck, Adam](#); [Senator Scott Dibble](#); [rep.frank.hornstein](#); [Munt, Jennifer](#); [Schreiber, Lona](#); [kevin.reich@minneapolis.mn.gov](#); [diane.hofstede@minneapolis.mn.gov](#); [Sandra.Colvin.Roy@ci.minneapolis.mn.us](#); [admin@minnehahacreek.org](#)
Subject: Southwest LRT Kenilworth Corridor
Date: Friday, August 16, 2013 2:35:06 PM

Metropolitan Council Chair Susan Haigh;

There is a serious issue that might have been swept under the rug relating to the quality of water in Lake Calhoun, Lake Harriet, Lake of the Isles, Cedar Lake and Brownie Lake resulting from the construction of LRT in the Kenilworth Corridor. There is a large section of land east of the West Lake Street bridge bordered by the corridor, West Lake Street, Chowen Ave., and Chowen Place that is owned by the Cedar Lake Shores Townhome Association (Association) that is designated as "protected wetland". There is also an adjacent section of land west of the bridge on the north side of the corridor that is also wetland. Although Chapter 4 of the DEIS extensively addressed wetlands throughout the entire proposed LRT route, it failed to address the wetland west of the bridge or the wetland owned by the Association in spite of the fact that there are signs on the Association property stating its presence.

If the Metropolitan Council elects to choose the co-location alternative or the shallow tunnel suggestion, it likely will require the taking for railroad purposes of a significant part of both wetlands. The wetlands are located within the Minnehaha Creek Watershed District and are located close to the northern shore of Lake Calhoun. As you know, various governmental organizations, which include the City of Minneapolis, the watershed district, Minnesota Department of Natural Resources, Minnesota Pollution Control Agency and the U.S. Army Corps of Engineers,* all have an interest in protecting wetlands.

The City of Minneapolis is extremely concerned about how the construction and operation of the LRT project might affect the quality of water in the lakes. Partial destruction of the wetlands could adversely affect the filtration of surface ground water pollution which in turn would adversely affect the water quality of the lakes. It would be impossible to mitigate the destruction of the wetlands because there is no

other land near the chain of lakes that is available to create a wetland or holding pond for mitigation.

Any argument that it is premature to be concerned about the wetland permitting process just won't hold water. Ever since the Metropolitan Council decided to seriously entertain ignoring the railroad relocation agreement in the DEIS, the process has become poisoned. Issues that had been resolved in the DEIS have been reopened; each time, the City of Minneapolis and its residents living near the corridor have been further disenfranchised by the Council's actions. Delay in consideration of environmental pollution caused by the project will, tragically, result in it being ignored until it is too late and could be further grounds for a law suit.

Consequences of the destruction of the wetlands should be considered now, before any further action is taken by the Metropolitan Council or any of its committees. Destruction of the wetlands could, of course, be avoided by the construction of a deep tunnel in the Kenilworth Corridor.

* "Draft Guidance on Identifying Waters Protected by the Clean Water Act"
http://water.epa.gov/lawsregs/guidance/wetlands/upload/wous_guidance_4-2011.pdf

Douglas J. Peterson
3315 Saint Paul Ave.
Minneapolis, MN 55416

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From: benjamin@marth.benkay.net
To: [swlrt](#)
Subject: kennilworth trail bottleneck
Date: Sunday, August 18, 2013 3:21:28 PM

I was reading about the planned Southwest Light Rail extension in the news and learned that there is some disagreement about part of the alignment along the Kenilworth corridor. It seems that there is a "bottleneck" along this corridor where addition of the light rail line has the potential to disrupt an existing freight line and a pedestrian/bicycle trail. The proposed workarounds have been to either reroute the freight traffic or tunnel the light rail, both very expensive proposals! (Apparently changing the SWLRT alignment isn't an option.) Has anyone considered elevating the pedestrian/bicycle trail along the bottleneck to make room for the light rail? It seems this would be way less expensive than the alternatives, not to mention the bonus of a nicer view for trail users!

From: [Miles Lindberg](#)
To: [Jacobson, Nani](#)
Cc: [Richard Weiblen \(rweiblen@libertyproperty.com\)](mailto:rweiblen@libertyproperty.com)
Subject: Southwest Light Rail Transit Project SDEIS
Date: Monday, August 05, 2013 3:42:44 PM

Ms Jacobson:

I have been asked to follow up on the preparation of the SDEIS as announced in the July 22, 2013 copy of the EQB Monitor. I am working with Liberty Property Trust, the owner of several land parcels adjacent to, and affected by the alignments of the LRT through the City of Eden Prairie. It is my understanding that the notice was to allow for input into the scope of the SDEIS, which I believe has been previously communicated through comments on the original DEIS and in subsequent meetings with Liberty Property Trust representatives. What is not included in the notice, and is of critical interest to Liberty Property Trust is the timing for the SDEIS preparation and the expected publication date and public comment period.

If you could provide a schedule for these events, even if it is subject to future changes based on how the study progresses, it would be very helpful to us.

Thanks in advance,

Miles Lindberg, ASLA
Senior Project Planner

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From: [Safety In the Park](#)
To: [Jacobson, Nani](#)
Cc: [Thom Miller](#); [Ginis, Sophia](#)
Subject: SDEIS Scoping comment
Date: Monday, August 05, 2013 8:59:53 PM
Attachments: [SitP SDEIS - Scoping comment.docx](#)

Hello Nani,

Please see the attached letter. It is the Safety in the Park comment to the SDEIS scoping.

Thank you,

Jami LaPray

August 06, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

The below constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. Note that this comment is post-marked before the published comment deadline of August 12, 2013.

This comment is officially from the neighborhood advocacy group, Safety in the Park, which while led by a steering committee of 7 residents represents perhaps thousands of residents in St. Louis Park MN as evidenced by over 1500 signed petitions supporting our stated cause, an email/blog recipient list of over 1000 individuals, and a Facebook page with over 325 participants. Safety in the Park is not-for-profit, volunteer neighborhood advocacy group based in St. Louis Park, MN. Safety in the Park supports the SWLRT project as a whole, but rejects the SWLRT proposal to relocate freight rail traffic onto newly built tracks and tracks that were never built for such a purpose. As a group, we have worked on this issue for over three years holding numerous public meetings, meetings with elected officials, and other stakeholders. We know our understanding of the issues and impacts of this project are strong.

Our comments are summarized as follows. The relocation plans named by the SPO (SWLRT Project office) as Brunswick West and Brunswick Central affect St. Louis Park in numerous ways. Before commenting on these effects, Safety in the Park challenges the very nature of the Met Council's decision-making process

- **Lack of Public Process:** For approximately three years, Hennepin County and MNDOT took responsibility for the re-routing of freight trains. During that time, there were numerous opportunities for public process including consultancy led public input meetings, City of St. Louis Park sponsored listening sessions, Hennepin County initiated hearings, a MNDOT EAW (eventually vacated) and a full DEIS. All of the above process featured a re-route option that planned for freight traffic to travel on the original MN&S track in St. Louis Park.
- As of approximately two months ago a completely new plan was established, essentially discarding all of the public process that took place for the last three years. (A delay that could have been avoided had Hennepin County reached out to the railroad that would be re-routed earlier.) Since these new plans were introduced no meaningful public process has occurred. On Jun13 and July 17 and 18 the Met Council held public meetings. The format for public input was inappropriate to the issue presented. At each of these meetings residents were given file cards

and sticky notes on which to write comments. Sticky notes and comment cards do not lend themselves to substantive comments. Comments received in this format cannot be anything but superficial and therefore easily dismissed. Also, without a longer period for comment many in the community could be left out just because they were unavailable at the times designated for comment.

Conspicuous by absence are any public hearings and most importantly any detailed environmental impact study on these new plans. This is particularly disturbing since the decision on these routes is to be made by the Met Council within 30 days of this comment period on the **scope** of this SDEIS and before the SDEIS is complete. It is beyond our understanding how state appointees on the Met Council can make such a decision with no environmental impact study and no hearings from the public. In addition, we do not understand how the FTA, State of Minnesota, and Hennepin County can allow such an impact to be even considered under these circumstances.

- **Inappropriate consideration of options:** In just the last three weeks, the SPO has officially made comments that of all eight options for freight rail relocation/co-location, only three remain as viable—two co-location options and one relocation. The SPO has commented that the following criteria were applied to their culling of the other five alternatives—the taking of property, cost, above ground structures, and community opposition. The remaining reroute option, Brunswick Central ranks higher on this scale of negative impacts than co-location options that have already been removed from consideration. This arbitrary and capricious choice by the SPO does not align with their self-declared criteria.
- **St. Louis Park City Council/State Legislator/St. Louis Park School Board opposition to re-route options:** The St. Louis Park City Council, School Board and Minnesota State Legislators have all sent letters to the Met Council rejecting the Brunswick Reroute options. The continuation of the SPO to consider these re-route options directly challenges a partner municipality and those who represent it.

Therefore, the scope and timeline of this SDEIS should be broad enough and long enough to completely halt the decision-making process underway by the Met Council on the collocate/relocate decision. Anything other than completion of a similar process to the one completed for the original DEIS before these decisions are made is illogical and violates the public's input on this very public project.

Furthermore, the following is a list of impacts that will be felt by the City of St. Louis Park should a relocation decision be made. Regardless of the above concerns on public process, the impacts of a St. Louis Park re-route are disconcerting at least, disastrous at most.

- **Safety:** The number one concern of this community is safety. To our point above, no derailment studies have been enacted by the SPO. However, it is common sense that placing a 20 - foot

high railroad berm and bridge above an elementary school playground is not a safe choice. There is empirical evidence showing disaster can strike when a train tumbles over an embankment onto structures and people below. This reason alone is enough to remove the re-route option from consideration.

- **Livability:** An elevated structure of the sort planned by the SPO in combination with grade changes and nature of this freight being hauled will undoubtedly create noise and visual pollution that will make educating and living near the structure near impossible. Again, no studies have been completed on this topic because the SPO has decided not to conduct them before the Met Council makes its decision.
- **Community Cohesion:** This planned elevated structure will create a very permanent physical division in our community.
- **Mitigation:** No mitigation plans have been shared with the public. No funding source has been identified.

For these reasons and more, the SDEIS scope should be changed to include the following:

- A detailed analysis of the relocation options that includes: noise and vibration studies, derailments studies, full environmental impacts to all buildings and people within the same geographic scope as the actual LRT path that was studied in the original DEIS.
- A robust public process that allows for public hearings and input after the SDEIS is published **BEFORE** any decision is made or even considered by the Met Council. In particular, the specific concerns of the City of St. Louis Park need addressing.
- A fair and equal comparison of co-location and relocation must be possible. Therefore, the four co-location options with property acquisitions and above grade structures must be returned to consideration and evaluated as part of the SDEIS.

From: [Bill Weber](#)
To: [Jacobson, Nani](#)
Subject: Comments Regarding the Light Rail Project - Southwest Corridor
Date: Tuesday, August 06, 2013 8:26:22 AM

Ms. Nani Jacobson, Project Manager, Southwest Light Rail Transit Project:

I am the President of SPS Companies, Inc. located at 6363 Highway 7 in St. Louis Park, MN. At least a portion of our property would be taken if the freight re-route (Brunswick Central and Brunswick West) is chosen so SPS does have a stake in the outcome in the SWLRT freight re-reroute issue. The light rail has been proposed for a number of years and was assumed to follow the existing freight train corridor. However, the freight train re-route plans were introduced in May of 2013 to move the freight trains off the light rail route leaving little time to consider the issue. The re-routes, while I understand were required to be engineered and considered, cannot be a real possibility.

To move large freight trains through new areas, areas that are currently residential and light industrial, would significantly alter the City of St. Louis Park especially with large berms located throughout the City. The freight trains run next to our building now and from personal experience I can tell you they do create significant noise and vibrations. From a commercial standpoint, this is okay, but from a residential standpoint I cannot imagine what the thought process would be to even consider this alternative. A similar situation is the airport. How many years has the Metropolitan Airport Commission dealt with the noise issues and soundproofing required in homes? My guess is you would be in a similar situation in St. Louis Park if a re-route option is chosen. I have not even addressed the safety issues, but others will deal with that far better than me.

What I am asking is to take the re-route options off the table. The Star Tribune editorial a few days ago even suggested that the SWLRT go back and consider other routes rather than have St. Louis Park and Minneapolis compete as adversaries.

Thank you for your consideration,

Bill Weber

Thomas J. Radio
Attorney DIRECT 612.349.5680
tradio@bestlaw.com



BEST & FLANAGAN LLP
225 South Sixth Street, Suite 4000 Minneapolis, Minnesota 55402
TEL 612.339.7121 FAX 612.339.5897 BESTLAW.COM

BEST & FLANAGAN

August 9, 2013

VIA EMAIL AND U.S. MAIL

Ms. Nani Jacobson
Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426
nani.jacobsonW@metrotransit.org

Re: Comments on Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Extension Project

Dear Ms. Jacobson:

Please find for inclusion in the official record the comments of Eaton Corporation-Hydraulics Group on issues raised in the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Extension Project. These comments are set forth in the attached letter from Mr. William VanArsdale, dated July 22, 2013.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Thomas J. Radio".

Thomas J. Radio
Attorney

TJR/cmc
Enclosure

cc:



Hydraulics Group

14615 Lone Oak Road
Eden Prairie, MN, 55344
tel: 952-937-9800

July 22, 2013

VIA U.S. Mail and email

James Alexander
Project Manager
Southwest Project Office
Park Place West Building, Suite 500
6465 Wayzata Boulevard
St. Louis Park, MN 55426

Re: Southwest LRT: Siting of OMF

Dear Mr. Alexander:

Eaton Corporation-Hydraulics Group ("Eaton") wishes to state its deep and abiding concern over the locating of the Operations and Maintenance Facility ("OMF") near the Eaton campus in Eden Prairie. The siting of the OMF on the current Eden Prairie Public Works site would have a devastating effect on the Eaton's operations and property, which would cost millions of dollars to either correct or compensate Eaton.

In Eaton's written comments on the Draft EIS and repeated submitted comments at the various public forums, Eaton's position has been clear and consistent:

- Eaton supports the efforts to construct the Southwest LRT.
- Eaton will work with the City of Eden Prairie and the Southwest LRT planning agency on the siting of the Mitchell Road/Technology Drive station and the parking facility.
- Eaton is concerned that concentrating the OMF, the Mitchell Road/Technology Drive station, and the parking facility will create a situation that will severely damage the value and operational viability of the Eaton campus.

Eaton relies upon and incorporates its prior comments submitted in response to the Draft EIS. Those comments were based upon and supported by the independent analysis of a property valuation firm that concluded that locating the station and associated parking facility on Eaton's northern border will significantly impact Eaton, resulting in the loss of the manufacturing building and the loss of land for future expansion. The valuation consultant also noted the adverse impact of the resulting traffic congestion. The consultant concluded that the decision to locate

the station and parking facility will result in a significant cost of relocation and the potential loss of 650 jobs. Those conclusions are only strengthened and further supported if the OMF facility is located on the Eden Prairie Public Works site.

The OMF would exacerbate an already complicated and adverse impact on the Eaton campus. As Eaton representatives have explained at public forums and the recent tour of its facility, locating the OMF adjacent to the Eaton campus will create a "perfect storm" of impacts that will severely diminish the value and efficiency of the Eaton operation. The chief impacts are as follows:

- **NOISE AND VIBRATION**—Eaton maintains substantial and sensitive testing facilities on its site that will be adversely affected by noise and vibration generated by the OMF and its operations. These testing facilities are critical to Eaton's operations. The loss of them places in jeopardy the viability of the entire site.
- **SECURITY**—The OMF could present a direct threat to protection of Eaton's property and personnel.
- **SAFETY**—If the station is located on the northeast portion of Eaton's property, the connecting tracks between the station and the OMF will have to either run through the heart of the Eaton campus or require the acquisition of one of its testing facilities, with a resulting threat to the safety of Eaton employees, guests, consultants, and customers as they attempt to negotiate safe passage between Eaton's buildings and the tracks.
- **LOSS OF EXPANSION POTENTIAL**—In a similar fashion, the combined impact of the OMF, the Mitchell Road/Technology station, and the parking facility will likely result in the direct taking by acquisition or condemnation of part of Eaton's property, thereby limiting Eaton's ability to expand its operations on this site.
- **COST**—The cost to the public to address, correct, or compensate Eaton for the impacts will be considerable and certainly in the tens of millions of dollars.

In light of these factors and associated costs, Eaton urges the Southwest LRT and all associated decision-makers to weigh carefully the cost and adverse impact of locating the OMF on the Eden Prairie Public Works site, and, in light of those costs, to select an alternative site.

Thank you for your consideration of these comments.

Sincerely,



William VanArsdale
Group President
Hydraulics, Filtration, and Golf Grip
Eaton Corporation

August 10, 2013



Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

Dear Ms. Jacobsen,

This letter constitutes a comment in response to the announcement of the Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Project published in the Minnesota EQB dated July 22, 2013. As required, this comment is post-marked before the published comment deadline of August 12, 2013.

This comment comes from the Sorensen Neighborhood Association Steering Committee. We represent the 763 households and 51 businesses of the neighborhood that would be most dramatically impacted by the relocation proposals.

We have the following concerns regarding the proposed relocation plans (named by the SWLRT Project office as Brunswick West and Brunswick Central):

The number one concern of this neighborhood is safety. Derailments do happen - we have seen multiple examples in the news over the past year. Running long freight trains hauling ethanol, coal and agricultural products at 25mph on an up to 20-foot high berm/bridge through our neighborhood is one thing, but to have it run next to and/or through the Park Spanish Immersion Elementary school playground, within 100 feet of that school building, which also houses an Early Childhood Family Education program and a pre-school, and within 500 feet of our High School is just asking for something to go wrong. This should be reason enough to remove the re-route option from consideration.

An elevated structure of the sort planned by the SPO, in combination with grade changes and the nature of the freight being hauled, will create noise, air and visual pollution that will have an impact on not only those people who live and work in this neighborhood, but especially on the schools it passes.

This planned elevated berm/bridge structure will create a very permanent physical and visual barrier within our neighborhood and between us and the surrounding neighborhoods.

No mitigation plans have been shared with the public to address the above concerns. In fact, at the May 28 unveiling of the new proposals, it was stated that there would be no mitigation. At the very least, there needs to be mitigation to protect the children and maintain an environment conducive to learning.

For these reasons, we ask that the scope of the Supplemental Draft Environmental Impact Statement be changed to include the following:

- A detailed analysis of the full environmental impacts to all buildings and people using the same geographic scope as the path that was studied in the original DEIS
- The analysis should include, but not be limited to, the following:
 - vibration studies
 - noise studies
 - air pollution studies
 - derailment studies
 - visual impact studies
 - the mitigations required to thoroughly address the results of each of the studies

We thank you for your consideration.

The Sorensen Neighborhood Association Steering Committee

Lois Zander, Meghan Phimister, Mary Beth Gaines, Bette Garske, Daniel Kriete, Jeff Persigehi

Cc: Marisol Simon

Gov. Mark Dayton

From: [Kulsrud, Geri M.](#)
To: [Jacobson, Nani](#)
Cc: ["mark.furhmann@metrotransit.org"](#); [Haigh, Susan](#); ["roxanne.smith@metc.state.mn.us"](#); [Schreiber, Lona](#); [Munt, Jennifer](#); [Vaneyll, Gary](#); [Elkins, Steve](#); ["mes.brimeyer@metc.state.mn.us"](#); [Cunningham, Gary](#); [Duininck, Adam](#); [Reynoso, Edward](#); [Doan, John](#); [Rummel, Sandy](#); [Melander, Harry](#); [Kramer, Richard](#); [Commers, Jon](#); [Chavez, Steven](#); [Wulff, Wendy](#); ["tschneider@eminnetonka.com"](#); ["dallendorf@eminnetonka.com"](#); ["pacomb@eminnetonka.com"](#); ["bellingson@eminnetonka.com"](#); ["twagner@eminnetonka.com"](#); ["bwiersum@eminnetonka.com"](#); ["jhiller@eminnetonka.com"](#); ["edurbin@eminnetonka.com"](#)
Subject: Comments on the Supplemental Draft Environmental Impact Statement for the Southwest LRT Line
Date: Monday, August 12, 2013 4:59:30 PM
Attachments: [Document.pdf](#)

Good afternoon,

I am emailing the attached at the request of Bill Griffith on behalf of SFI Ltd. Partnership 54 the owner of Claremont Apartments located at 10745 Smetana Road, in Minnetonka MN.

Thank you.

Geri Kulsrud
Legal Secretary
p | 952-896-3285
f | 952-896-3333
www.larkinhoffman.com Larkin Hoffman Attorneys

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August 12, 2013

Ms. Nani Jacobson
Project Manager
Southwest Light Rail Transit Project Office
St. Louis Park, Minnesota 55426

Via Email and U.S. Mail

Re: Comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest LRT Line ("SW LRT") on behalf of SFI Ltd. Partnership 54 ("Owner") of the Claremont Apartments located 10745 Smetana Road, Minnetonka, Minnesota ("Claremont Apartments") - Failure to Consider Impact to Section 4(f) Property
Our File # 36,292-00

Dear Ms. Jacobson:

This letter supplements our comment letter, dated December 28, 2012, on behalf of SFI Partnership 54, the owner of the Claremont Apartments. In our meeting with project management staff, including Mark Fuhrmann, Metro Transit, we expressed strong concerns that Segment 3 of the SW LRT-LPA severely and negatively impacts the Claremont Apartments and the public recreational trail (the "Public Trail"). The Public Trail travels through Opus Hill and is part of a citywide recreational trail system maintained and operated by the City of Minnetonka. (Please see the graphic depiction of the alternative under discussion by the Southwest Corridor Management Committee, identified as "TI #7 Opus Hill".)

It is important to note that the location of either the LPA or the proposed alternative will remove at least 50 percent of the existing vegetation through a densely wooded conservation area. In addition, the retaining wall design places a long wall a few feet from the trains causing noise from train operations to reflect back against the Public Trail and the Claremont Apartments, while removing the mitigating effect of the existing vegetation. This creates a significant negative environmental impact on both the Public Trail and the Claremont Apartments.

Further, Chapter 7 of the DEIS addresses the impact of the SW LRT-LPA on Section 4(f) property. (See 23 CFR Part 774.) The Public Trail is located in Segment 3 of the LPA, but the only potentially impacted Section 4(f) property identified by the DEIS in Segment 3 is 0.227 acres of land in the Nine Mile Creek Conservation Area. We believe the Public Trail must also be classified as Section 4(f) property. As a result, we ask if the project addressed whether the Public Trail was considered for Section 4(f) purposes? If so, what were the findings and results? If the Public Trail was not considered for Section 4(f) purposes, why was it excluded from Section 4(f) consideration?

If a Section 4(f) analysis has not been conducted for the Public Trail, then at a minimum, we expect a written determination of the applicability of Section 4(f) to the Public Trail before a final decision is made as to the alignment of LRT through the Opus Hill adjacent to the Claremont Apartments.

The Public Trail is located within a permanent public easement in favor of the City of Minnetonka for use as a public recreational trail within a large city wide trail system. In sum, the Public Trail is publicly owned through permanent easements, and it will be directly affected by the LPA or the alternatives under consideration. Therefore, a determination of applicability and Section 4(f) analysis must be performed for the Public Trail in the Opus Hill area.

Please address this analysis as part of the Supplemental DEIS and the FEIS and advise us of any actions or analysis regarding Section 4(f) that may have been conducted through the course of the project for the Opus Hill area and specifically the Public Trail. If no actions or analysis have been conducted then we fully expect a Section 4(f) determination of applicability to be initiated and a subsequent Section 4(f) analysis to be completed. The Southwest LRT project cannot go forward until its proposers fully satisfy the requirements of NEPA and applicable federal law.

Sincerely,

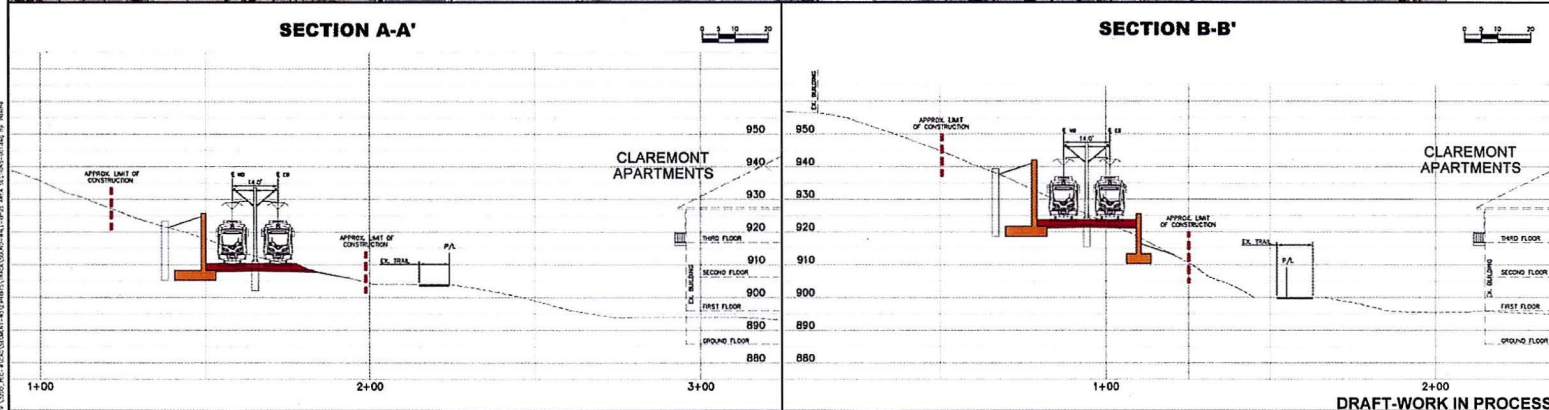
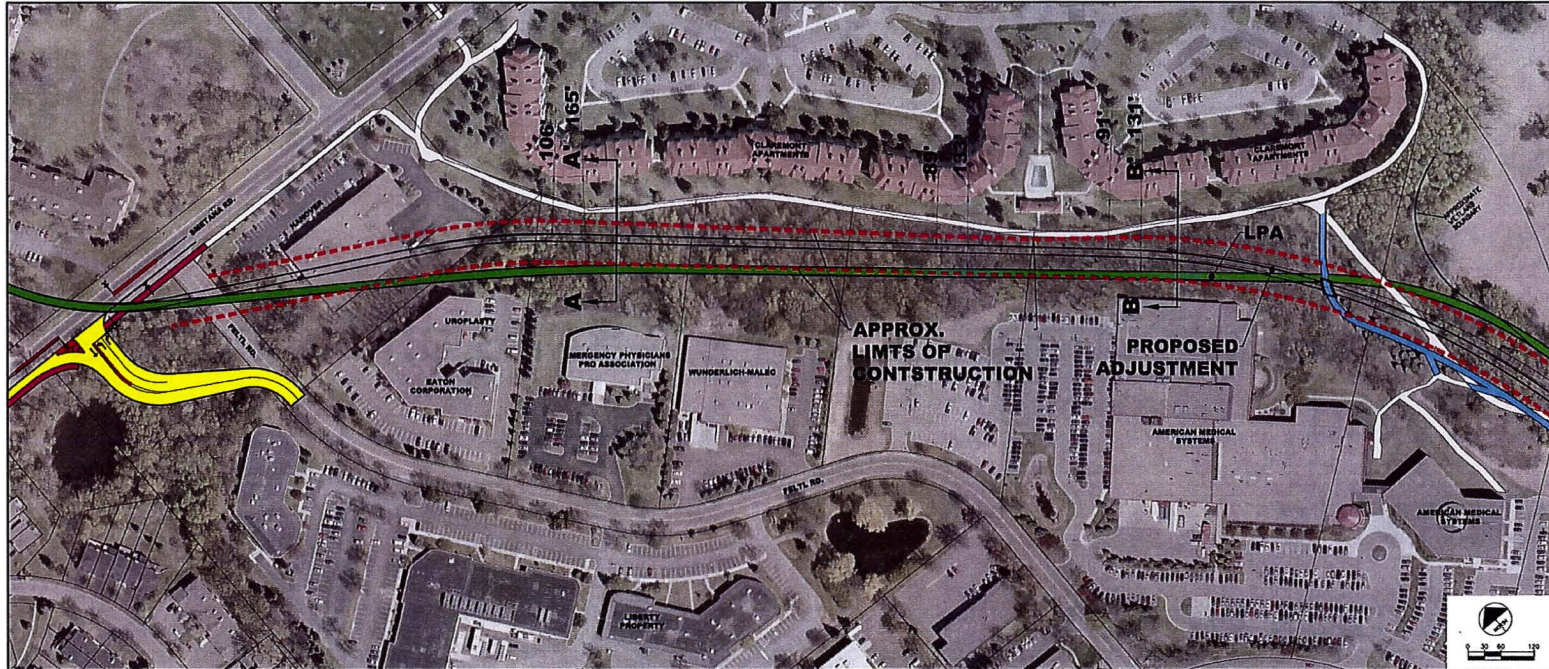


William C. Griffith, for
Larkin Hoffman Daly & Lindgren Ltd.

Direct Dial: 952-896-3290
Direct Fax: 952-842-1729
Email: wgriffith@larkinhoffman.com

cc: Mark Fuhrmann, Metro Transit
Members of the Metropolitan Council (via email with enclosures)
Members of the Minnetonka City Council (via email with enclosures)
Elise Durbin, Community Development Supervisor, City of Minnetonka (via email with enclosures)

TI #7: Opus Hill



SOUTHWEST LRT
TI-7: OPUS HILL

DRAFT-WORK IN PROCESS

IR: #7
REV: 0
DATE: 04/24/2013



August 12, 2013



Ms. Nani Jacobson
Project Manager
Southwest Light Rail Transit Project Office
St. Louis Park, Minnesota 55426

Via Email and U.S. Mail

Re: Comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest LRT Line ("SW LRT") on behalf of SFI Ltd. Partnership 54 ("Owner") of the Claremont Apartments located 10745 Smetana Road, Minnetonka, Minnesota ("Claremont Apartments") - Failure to Consider Impact to Section 4(f) Property
Our File # 36,292-00

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This letter supplements our comment letter, dated December 28, 2012, on behalf of SFI Partnership 54, the owner of the Claremont Apartments. In our meeting with project management staff, including Mark Fuhrmann, Metro Transit, we expressed strong concerns that Segment 3 of the SW LRT-LPA severely and negatively impacts the Claremont Apartments and the public recreational trail (the "Public Trail"). The Public Trail travels through Opus Hill and is part of a citywide recreational trail system maintained and operated by the City of Minnetonka. (Please see the graphic depiction of the alternative under discussion by the Southwest Corridor Management Committee, identified as "TI #7 Opus Hill".)

It is important to note that the location of either the LPA or the proposed alternative will remove at least 50 percent of the existing vegetation through a densely wooded conservation area. In addition, the retaining wall design places a long wall a few feet from the trains causing noise from train operations to reflect back against the Public Trail and the Claremont Apartments, while removing the mitigating effect of the existing vegetation. This creates a significant negative environmental impact on both the Public Trail and the Claremont Apartments.

Further, Chapter 7 of the DEIS addresses the impact of the SW LRT-LPA on Section 4(f) property. (See 23 CFR Part 774.) The Public Trail is located in Segment 3 of the LPA, but the only potentially impacted Section 4(f) property identified by the DEIS in Segment 3 is 0.227 acres of land in the Nine Mile Creek Conservation Area. We believe the Public Trail must also be classified as Section 4(f) property. As a result, we ask if the project addressed whether the Public Trail was considered for Section 4(f) purposes? If so, what were the findings and results? If the Public Trail was not considered for Section 4(f) purposes, why was it excluded from Section 4(f) consideration?


Ms. Nani Jacobson
August 12, 2013
Page 2

If a Section 4(f) analysis has not been conducted for the Public Trail, then at a minimum, we expect a written determination of the applicability of Section 4(f) to the Public Trail before a final decision is made as to the alignment of LRT through the Opus Hill adjacent to the Claremont Apartments.

The Public Trail is located within a permanent public easement in favor of the City of Minnetonka for use as a public recreational trail within a large city wide trail system. In sum, the Public Trail is publicly owned through permanent easements, and it will be directly affected by the LPA or the alternatives under consideration. Therefore, a determination of applicability and Section 4(f) analysis must be performed for the Public Trail in the Opus Hill area.

Please address this analysis as part of the Supplemental DEIS and the FEIS and advise us of any actions or analysis regarding Section 4(f) that may have been conducted through the course of the project for the Opus Hill area and specifically the Public Trail. If no actions or analysis have been conducted then we fully expect a Section 4(f) determination of applicability to be initiated and a subsequent Section 4(f) analysis to be completed. The Southwest LRT project cannot go forward until its proposers fully satisfy the requirements of NEPA and applicable federal law.

Sincerely,

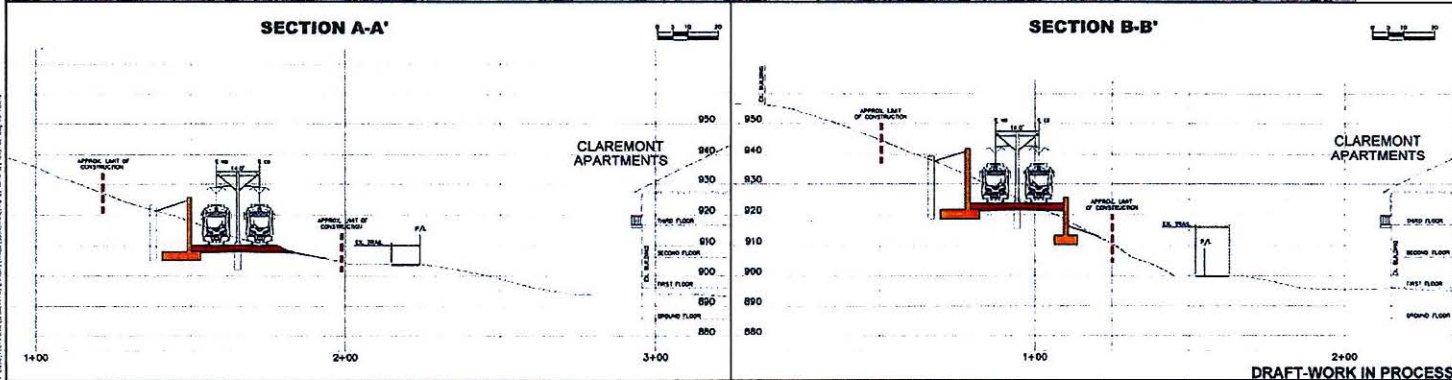
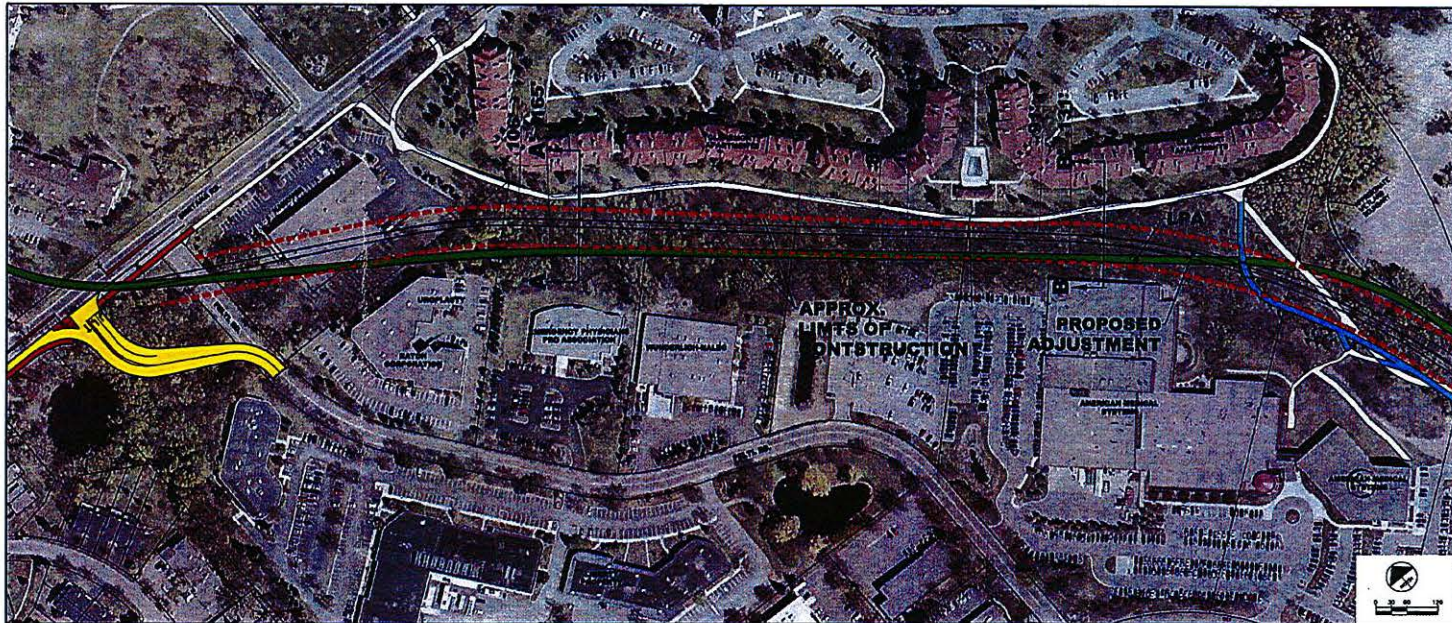


William C. Griffith, for
Larkin Hoffman Daly & Lindgren Ltd.

Direct Dial: 952-896-3290
Direct Fax: 952-842-1729
Email: wgriffith@larkinhoffman.com

cc: Mark Fuhrmann, Metro Transit
Members of the Metropolitan Council (via email with enclosures)
Members of the Minnetonka City Council (via email with enclosures)
Elise Durbin, Community Development Supervisor, City of Minnetonka (via email with enclosures)

TI #7: Opus Hill



SOUTHWEST LRT
TI-7: OPUS HILL

DRAFT-WORK IN PROCESS

IRT: 97
REV: 0
DATE: 04/24/2013

SOUTHWEST METROPOLITAN **AECOM** **SRM**

From: [Barb Thoman](#)
To: [Jacobson, Nani](#)
Subject: Comments on SDEIS
Date: Monday, August 12, 2013 9:26:30 PM
Attachments: [SW LRT SDEIS 2013 TLC comments.pdf](#)

Hello Ms. Jacobson:

TLC's comments are attached. Would you please confirm that you received my e-mail?

Thank you.

Barb Thoman

Barb Thoman, Executive Director

Transit for Livable Communities | Bike Walk Twin Cities

2356 University Avenue West, Suite 403

Saint Paul, MN 55114

Desk: 651-789-1405 | Cell: 651-500-5958

barbt@tlcminnesota.org

www.tlcminnesota.org | www.bikewalktwincities.org

TRANSIT for Livable Communities



2356 University Avenue West, Suite 403, Saint Paul, MN 55114
Phone: 651-767-0298 E-mail: tlc@tlcminnesota.org Web site: www.tlcminnesota.org

August 12, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Via e-mail: Nani.jacobson@metrotransit.org

Re: Comments on Scope of Southwest Light Rail SDEIS

Dear Ms. Jacobson:

Transit for Livable Communities strongly supports the implementation of Southwest Light Rail Transit (SWLRT) as a key part of a growing transit system in the Twin Cities region. This corridor already has solid bus ridership and a strong employment base. New light rail will provide attractive opportunities for future transit-oriented development and for the establishment and expansion of transit hubs along the corridor. When it opens, SWLRT is projected to carry 23,000 riders daily, traveling to work, school, and other destinations. [Ridership estimate is from July 2011 for a 2017 opening.]

Eden Prairie Alignment and Stations

TLC's interest is in ensuring that the routing of SWLRT is reasonably direct from a rider's point of view and the stations are spaced far enough apart so that travel time will be attractive and convenient. We hope that the Twin Cities region can avoid the outcome of light rail to Hunt Valley in Baltimore and light rail to Golden in Denver. In these cases, alignments and station spacing resulted in long ride times that are burdensome for transit riders and not an attractive alternative to people who drive.

Location of Operations and Maintenance Facility

The evaluation of the site location for an Operations and Maintenance Facility (OMF) should include a full exploration of the pros and cons of the Hopkins and Eden Prairie locations (including payment in lieu of property taxes if necessary) to secure the best location for the facility from an operations standpoint and from the perspective of access to potential future OMF employees.

Potential Increases in Cost Due to Freight Rail Relocation or Co-location

TLC is mindful of the need for adequate revenue to provide for the build-out of the Metropolitan Council's Transit System Plan of expanded bus and rail. In addition we seek a full build out of safe and convenient connecting networks for bicycling and walking. For that reason, we urge project planners to keep total capital costs for the SWLRT project within a budget target (that assumes new future state/local funding) that will not delay the implementation of the Bottineau Corridor, an east metro rail corridor, the proposed arterial rapid bus system, and the expansion of regular and express bus service.

Please consider identification of a Minimum Operating Segment within the DEIS tied to the original budget. Upgrades were made to the Hiawatha Line after project opening as funds became available (e.g., for structured parking, for additional stations, for longer station platforms). An additional station was added to the Northstar line after the line opened.

In addition to the study of relocation and co-location of freight rail, TLC recommends that the SDEIS include study of the feasibility of a single track LRT segment in the Kenilworth Corridor (West Lake Station to Penn Avenue Station). What would be the operational issues, including travel time impacts, of this option? The new west side light rail from Denver to Golden in Colorado includes several miles of single track.

Other issues

We ask that bicycle and pedestrian connections be carefully assessed including: 1) design of proposed LRT and freight rail alignments; 2) stations and park-and-ride lots; and 3) OMF site. Station locations along the line must allow for safe and convenient access by walking and bicycling and for people using a mobility assistive device.

We believe that the cost, feasibility, and impacts of elevating the bicycle/pedestrian trail in the Kenilworth Corridor should be examined. Based on a count made in September 2009, the trail carried approximately 2,300 daily bicyclists/pedestrians (More recent data is not available, but is likely substantially higher). An elevated trail could be landscaped, aesthetically pleasing, and in keeping with the corridors period housing and natural environment.

Land aquisition at stations for development and redevelopment should be identified in the SDEIS, in addition to the land needed for the purposes of access by trains, buses, cars, bicycles and pedestrians. This would be consistent with the Metropolitan Council TOD Strategic Action Plan.

Sincerely,



Barb Thoman
Executive Director

From: [Margret Forney](#)
To: [Jacobson, Nani](#)
Subject: Supplemental Draft Environmental Impact Statement Comments
Date: Thursday, August 15, 2013 9:22:47 AM

NANI -

I just realized the due date was the 12th and not the 15th. I hope these comments from West Calhoun Neighborhood Council and The Edge Business Association will be taken into consideration.

MEG FORNEY

C:612-926-7707/W:612-924-4343/F:612-920-4706

www.megforney.com

<https://www.facebook.com/meg.forney>

Realtor, Coldwell Banker Burnet

Minneapolis Lakes Office



Think green. Please consider the environment before you print this email.

Dear Ms. Jacobson

Following the meetings and open houses of the past few weeks, West Calhoun Neighborhood Council (WCNC) feels compelled to make some points regarding the options for SWLRT that have been presented.

While WCNC is eager to welcome the SWLRT West Lake Street Station, we are concerned that the Project Office understand the careful planning that will be required to keep traffic flowing--pedestrian, auto, bus, bicycle--to, from and around the station. Without adding a bus lane on the Lake St. bridge, or taking the bus stops off the bridge entirely, traffic congestion will surely increase to a gridlock level. The current plan shows pick-up and drop off in the traffic lane.

WCNC does not support any co-location of freight rail. And we do not believe either tunnel plan is the solution. It is clear to us that freight rail has to be relocated. Given the high cost of both tunnel options--and the fact that the freight rail route was always considered to be temporary--WCNC strongly encourages the Project Office to seek a better route than the one through the middle of St. Louis Park.

WCNC does not want to derail federal support for this project; however, the current plans are unacceptable to both South Minneapolis and St. Louis Park residents who would be affected. We urge the Met Council to seek some fresh alternatives to the plans as they have been presented, and to do it soon. WCNC is also concerned that the controversy and contentious debate will sink what is truly an exciting project that will enliven cities along the route and serve the residents and businesses of all the communities involved.

We thank you for all your hard work, but please don't consider the planning finished yet.

West Calhoun Neighborhood Council and The Edge Business Association for West
Calhoun
August 15, 2013

From: [Darby, Valincia](#)
To: [Jacobson, Nani](#)
Cc: [Lindy Nelson](#)
Subject: Southwest Light Rail Transit Extension
Date: Monday, August 12, 2013 9:47:02 AM
Attachments: [er_13-0513.pdf](#)

Good Morning,

U.S. Department of the Interior correspondence on the subject project is attached.
If there are questions please contact this office at (215) 597-5378.

Regards,

Valincia Darby

--

Valincia Darby

Regional Environmental Protection Assistant

Department of the Interior, OEPC

200 Chestnut Street, Rm. 244

Philadelphia, PA 19106

Phone: (215) 597-5378 Fax: (215) 597-9845

Valincia_Darby@ios.doi.gov



IN REPLY REFER TO:

United States Department of the Interior

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



August 12, 2013

9043.1
ER 13/0513

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson:

The U. S. Department of the Interior (Department) has no comment on Notice of Intent to prepare a Supplemental Draft Environmental Impact Statement for the Southwest Light Rail Transit Extension Project (Formerly referred to as the Southwest Transitway) located in Hennepin County, Minnesota.

Thank you for the opportunity to comment.

Sincerely,

Lindy Nelson
Regional Environmental Officer

From: [Gail Dorfman](#)
To: [Jacobson, Nani](#)
Subject: Thank you for the opportunity to comment on the scope of the SDEIS.docx
Date: Monday, August 12, 2013 4:58:59 PM
Attachments: [Thank you for the opportunity to comment on the scope of the SDEIS.docx](#)

Hi Nani,

Here is the final version. I don't know why two versions were sent through before.

Please find attached a comment I'm submitting to the scope of the SDEIS. Thank you.

Gail Dorfman
Hennepin County Commissioner
District 3

Disclaimer: Information in this message or an attachment may be government data and thereby subject to the Minnesota Government Data Practices Act, Minnesota Statutes, Chapter 13, may be subject to attorney-client or work product privilege, may be confidential, privileged, proprietary, or otherwise protected, and the unauthorized review, copying, retransmission, or other use or disclosure of the information is strictly prohibited. If you are not the intended recipient of this message, please immediately notify the sender of the transmission error and then promptly delete this message from your computer system.

Thank you for the opportunity to comment on the defined scope of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit (LRT) Extension project.

The Southwest LRT Project is a critical link in the development of a comprehensive transit system for our Twin Cities region. More than a decade of planning and analysis went into studying more than 30 LRT alignments and building the community consensus and technical basis to support the approval of the Locally Preferred Alignment (LPA) by the Cities, County and Metropolitan Council in 2010.

As the County Commissioner representing the two cities impacted by both the LRT and freight alignments, and as the Chair of the Southwest Policy Advisory Committee that managed the Alternatives Analysis process and LPA recommendation, I am pleased to see that the Southwest Project Office, through the SDEIS, will thoroughly evaluate the environmental impacts associated with proposed adjustments to the LPA and to the freight alignment options. It is important that the public fully understands the environmental impacts and costs of all reasonable adjustments to the LPA and freight alternatives.

I ask that the scope of the SDEIS includes a thorough assessment of the following:

- For the Minneapolis Segment, all environmental impacts associated with the shallow and deep tunnel options and co-location of the freight should be identified, analyzed and shared with the public. Methods to mitigate those impacts and the costs of mitigation should be defined and evaluated. The impacts on economic development, affordable housing and community connections should also be identified, analyzed and shared with the public.
- For the St. Louis Park Segment, all environmental impacts associated with the Brunswick Central freight rail relocation option should be identified, analyzed and shared with the public. Methods to mitigate those impacts and the costs of mitigation should be defined and evaluated. The impacts of freight co-location on economic development, affordable housing and community connections at the Wooddale and Beltline Stations should also be identified, analyzed and shared with the public.
- For the St. Louis Park Segment, an analysis of a modified MN&S freight relocation alternative should be evaluated – one that would moderate grade increases and curves combined with property acquisition to widen the berm and the MN&S rail bed to address the safety, noise and vibration concerns expressed by TC&W, the City of St. Louis Park and members of the St. Louis Park community. This expanded scope and additional evaluation need not extend the time needed for SDEIS analysis as it calls for refining alternatives previously studied.

From: [Janet Jeremiah](#)
To: [Jacobson, Nani](#)
Cc: [Robert Ellis](#); [David Lindahl](#); [Rick Getschow](#)
Subject: SDEIS Scope Comments
Date: Monday, August 12, 2013 4:22:42 PM
Attachments: [SDEIS Comments EP 2013-08-12 signed.pdf](#)

Hi Nani – Attached are Eden Prairie’s comments on the SDEIS scope for SW LRT. Thank you! –
Janet

Janet Jeremiah, AICP
Community Development Director
City of Eden Prairie
952-949-8529
jjeremiah@edenprairie.org

August 12, 2013

Ms. Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500, St. Louis Park, MN 55426

SUBJECT: SWLRT SDEIS Comments

Ms. Jacobson:

The City of Eden Prairie appreciates the opportunity to provide input on the SDEIS and respectfully submit the following comments:

- 1) The Eden Prairie LRT alignment contemplates a station with a large Park and Ride facility west of Mitchell Road. The scope of the SDEIS analysis should include a station with a Park and Ride facility located on the northwest corner of the City Center property. The scope should review impacts and potential mitigation steps needed to address any potential degradation to emergency service response times of Hennepin County Ambulance, Eden Prairie Police and Eden Prairie Fire. Mitigation of unacceptable traffic impacts caused by an at-grade rail crossing at Mitchell Road should also be reviewed. If acceptable mitigation of Mitchell Road impacts cannot be accomplished, sites east of Mitchell Road and west of SW Station should be reviewed as alternate sites for a westernmost station with a Park and Ride facility.
- 2) The Eden Prairie Maintenance Facility property is a potential site for the SWLRT Operations and Maintenance Facility. If that location is selected as the preferred alternative, then the scope of the detailed analysis should further explore the impacts on the city's ability to provide reliable, timely and economical essential city services should a centralized location in Eden Prairie not be available for relocation.
- 3) The Town Center station alternatives analysis (including the modified LPA, Comp Plan, and Singletree alignments) should include analysis of the need for a new north-south roadway and/or pedestrian/bicycle connections between Singletree Lane and Technology Drive. A roadway connection would improve vehicular access during and after construction, while pedestrian/bicycle connections would serve transit dependent riders in the area and help reduce the need for others to drive to the station. The analysis should also include alternatives for providing park and ride facilities for each station alternative.

Thank you for your consideration.

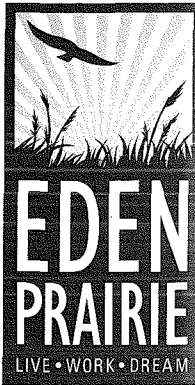
Sincerely,



Janet Jeremiah, Community Development Director
City of Eden Prairie



Robert Ellis, Public Works Director
City of Eden Prairie



OFC 952 949 8300
FAX 952 949 8390
TDD 952 949 8399

8080 Mitchell Rd
Eden Prairie, MN
55344-4485

edenprairie.org



Minneapolis
City of Lakes

**Department of
Public Works**

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

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Minneapolis MN 55415

Office 612 673-3000
Fax 612 673-3565
TTY 612 673-2157

**Community Planning &
Economic Development**

105 5th Avenue South - Suite 200
Minneapolis MN 55401-2534

Office 612 673-5095
Fax 612 673-5100
TTY 612 673-5154

August 12, 2013

Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426



Dear Ms. Jacobson:

The City of Minneapolis appreciates the opportunity to comment on the scope of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit Extension Project (formerly referred to as the Southwest Transitway). As indicated in the Federal Register notice, "the SDEIS scope will include, but not be limited to, the following areas: Eden Prairie LRT alignment and stations; LRT OMF site; freight rail alignments (i.e. Relocation and Co-location); and other areas where FTA and the Council determine that there is a need to be supplemented with additional information which was not included in the Project's October 2012 DEIS."

At the time of this writing, our understanding from the Southwest LRT Project Office is that the Metropolitan Council is carrying forward three options for freight rail alignments, all of which differ substantially from the alternatives considered in the October 2012 Draft Environmental Impact Statement. Two of the alignments involve LRT tunnels through the Kenilworth corridor in Minneapolis, with freight rail remaining in the corridor.

When documenting the environmental effects of the tunnel options in the SDEIS, the City of Minneapolis requests that the Metropolitan Council and the Federal Transit Administration include consideration of the following:

- The effect that a tunnel may have on lake levels in Cedar Lake and Lake of the Isles and the effect that a tunnel may have on groundwater movement between the lakes.
- The effect that tunnel dewatering may have on the aquatic environment of the lakes, including but not limited to the water temperature in Cedar Lake and Lake of the Isles, any effect on the lakes' current freeze-thaw cycle, and any effects on aquatic ecology.
- An analysis of the capacity of the sanitary and storm sewer systems and their ability to handle the additional load from tunnel dewatering.
- Documentation of the loss of vegetation in the Kenilworth corridor that results from each option, with an analysis of the degree to which vegetation would be re-established following construction.
- Documentation of the effects that each option would have on full implementation of regional transitways as shown in the Regional 2030 Transportation Policy Plan, including but not limited to the ridership effects of building the West Lake Street station underground, the ridership effects of eliminating the 21st Street



City Information
and Services

station, and the connection between Southwest LRT and the Midtown Corridor.

- Documentation of noise and vibration for all elements of the options that differ from the locally-preferred alternative, including the effect of freight and LRT noise resulting from the construction of crash walls, retaining walls, and other infrastructure that was not previously analyzed.
- Documentation of the environmental effects of any proposed changes to the layout of freight tracks in the Kenilworth corridor.

While it is important to understand and document the above environmental effects, there are likely other potential effects that have not been anticipated at this time but should be considered in your analysis and documentation. As you know, these alternatives are relatively new in the history of Southwest Transitway project development, and it is incumbent on the Metropolitan Council and the FTA to develop a comprehensive scope for the SDEIS.

Thank you for the opportunity to submit suggestions for scoping.

Sincerely,



Steven A. Kotke
City Engineer - Director of Public Works



Jeremy Hanson-Willis
Director of Community Planning and Economic Development

CC: Mayor Rybak
Council Member Colvin Roy, Chair Transportation & Public
Works Committee
Jenifer Hager
Jack Byers

From: [Pflaum, Donald C.](#)
To: [Jacobson, Nani](#)
Cc: [Rybak, R.T.](#); [Colvin Roy, Sandra K.](#); [Kotke, Steven A.](#); [Hanson Willis, Jeremy J.](#); [Hager, Jenifer A](#); [Byers, Jack P.](#)
Subject: SW Corridor: SDEIS Scope
Date: Monday, August 12, 2013 2:35:26 PM
Attachments: [Minneapolis SDEIS NOI Comments.pdf](#)

Nani,

Please see the attached letter, which includes the City of Minneapolis Comments on the SW Corridor SDEIS Notice of Intent. You will receive a copy of the signed letter in the mail.

Thank you.

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



Minneapolis
City of Lakes

**Department of
Public Works**
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August 12, 2013

Nani Jacobson, Project Manager
Southwest Light Rail Transit Project Office
6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Ms. Jacobson:

The City of Minneapolis appreciates the opportunity to comment on the scope of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit Extension Project (formerly referred to as the Southwest Transitway). As indicated in the Federal Register notice, "the SDEIS scope will include, but not be limited to, the following areas: Eden Prairie LRT alignment and stations; LRT OMF site; freight rail alignments (i.e. Relocation and Co-location); and other areas where FTA and the Council determine that there is a need to be supplemented with additional information which was not included in the Project's October 2012 DEIS."

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station, and the connection between Southwest LRT and the Midtown Corridor.

- Documentation of noise and vibration for all elements of the options that differ from the locally-preferred alternative, including the effect of freight and LRT noise resulting from the construction of crash walls, retaining walls, and other infrastructure that was not previously analyzed.
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While it is important to understand and document the above environmental effects, there are likely other potential effects that have not been anticipated at this time but should be considered in your analysis and documentation. As you know, these alternatives are relatively new in the history of Southwest Transitway project development, and it is incumbent on the Metropolitan Council and the FTA to develop a comprehensive scope for the SDEIS.

Thank you for the opportunity to submit suggestions for scoping.

Sincerely,



Steven A. Kotke
City Engineer - Director of Public Works



Jeremy Hanson-Willis
Director of Community Planning and Economic Development

CC: Mayor Rybak
Council Member Colvin Roy, Chair Transportation & Public
Works Committee
Jenifer Hager
Jack Byers

August 12, 2013



Ms. Nani Jacobson
Project Manager
Southwest LRT Project Office
Park Place West, 6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Nani,

This letter is in response to the July 22, 2013 Notice of Intent to prepare a Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit Extension Project.

The City of St. Louis Park submits the attached list of “Key Issues and Comments on Freight Rail Alternatives” that was originally submitted to Mark Fuhrmann on July 9, 2013. This document specifies the issues that are of primary importance to St. Louis Park, especially related to the impacts of the new freight rail routing alternatives. The City of St. Louis Park requests that these issues and impacts, as well mitigation measures for each alternative route be addressed in the SDEIS.

In addition we request all of the standard and required Environmental Assessment Worksheet and Environmental Assessment Impact items and topics be addressed for to the new alignment options.

Thank you for this opportunity to comment.

Sincerely,



Tom Harmening
City Manager

City of St. Louis Park

Key Issues and Comments on Freight Rail Alternatives

July 8, 2013

The City of St. Louis Park has reviewed the eight (8) alternative freight rail routing alignments and provides the following comments and requests for further information for evaluating the alternatives. *It is important to note that any comment, question or suggestion relating to the Re-Location Alternatives should not in any way be construed that the City supports the re-location options.*

Key Issues to address for freight rail routing to be successful:

Co-location Alternatives

1. Presence of freight rail and trains potentially interferes with access to LRT station platforms by foot, bike, bus and auto. Significant traffic impacts will occur at Wooddale Avenue and Beltline Boulevard; these impacts must be assessed and addressed. A circulation study for the areas around the stations is needed to evaluate and mitigate traffic impacts in the area.
2. Grade separation of freight rail at Wooddale Avenue is not practical; however grade separating LRT and the Cedar Lake Regional Trail is feasible and would reduce traffic conflicts. The search for ways to eliminate the negative traffic and access impacts from freight rail and LRT crossing Wooddale Avenue needs to continue. This is a vital north-south route for the community and the Elmwood and Sorensen neighborhoods specifically, and long delays due to LRT and freight trains are not acceptable or safe. Alternative grade separated vehicular crossings or routes under or over the rail/trail corridor are needed at either Yosemite or Xenwood Avenues.
3. Beltline Boulevard must be grade separated from LRT, freight rail and the regional trail by putting Beltline with sidewalks below the rail/trail corridor. Beltline is the only north-south crossing of the rail/trail corridor between the W. Lake Street Bridge and Highway 100. It is critical for circulation in the community and emergency vehicles that traffic movements not be unduly delayed by the presence of freight trains or LRT. Only grade separation will ensure that no matter when freight trains and LRT trains arrive, or whether they are on schedule or not, traffic and emergency vehicles will be able to move where they need to go. The accumulative effects of at grade crossings at both Wooddale and Beltline are particularly troubling, since a train that creates traffic problems at one street crossing will move on to create crossing problems at the next street; and in some cases a single train will be long enough to block both intersections at once. Grade separation at Beltline would mean traffic could at least continue to flow there, and if the Wooddale crossing is blocked, traffic could divert to either Beltline on the east or Louisiana Avenue on the west if needed.

4. Presence of freight rail and LRT at station areas affects development opportunities; design must consider development-friendly configurations.
5. Emergency vehicle delays will occur when freight trains are present at Wooddale Avenue and Beltline Boulevard. Grade separation or other means of maintaining emergency vehicle accessibility in the community must be provided.
6. The Midtown trolley station/platform may be located at the West Lake Station and requires additional property takings; these costs must not be attributed to the SWLRT project.

Re-Location Alternatives

A. Community Cohesion and Aesthetic Impacts

1. Both relocation options create a completely new freight rail right-of-way where one has never existed before. The elevated freight rail right-of-way creates a major visual and physical barrier through the middle of St. Louis Park (SLP), the SLP school district campus, and the Sorensen/Lenox and Bronx Park/Birchwood neighborhoods. Community cohesion is compromised. Physical connections, such as walkways and roadways through the barrier must be created in order to provide needed community connections and reduce the barrier effect. These should include attractive, safe pedestrian underpasses or bridges at street crossings like Dakota Avenue, Wooddale Avenue, Lake Street and 27th Street, as well as facilities to connect portions of the community split by the elevated train tracks, including the Central Community Center with the football field, Roxbury Park with Keystone Park, and Birchwood neighborhood with Bronx Park neighborhood, Dakota Park, Peter Hobart School and Cedar Lake Regional Trail access.
2. Dramatic negative visual impacts will be created by the elevated trains and the structures that support them. A MNDOT Visual Quality Manual type of process must be undertaken to establish the visual treatments and mitigation needed to reduce the impact of the elevated trains. It should guide the aesthetics and appearance of the structure as it crosses through different areas of the city, each with its own characteristics and needs, such as the school campuses, residential areas, commercial areas, the overpass of Highway 7, etc. This process must be conducted with citizens and other stakeholders and must include much more than a bare minimum treatment. It should incorporate public art and other elements designed to minimize the negative aesthetic impacts on the City and use the structures where possible to build community cohesion, identity and sense of place. Specific mitigation items need to be incorporated as a part of the reroute cost.
3. The project budget must include not only the cost of preparing the Visual Quality Manual but also the cost of constructing the aesthetic and community cohesion improvements.

B. Safety impacts

1. Elimination of reverse curves, reductions in grade changes, upgrading of tracks and elimination of at grade freight rail crossings of streets inherently improves safety of freight traffic in St. Louis Park. These improvements reduce the potential for accidents and derailments. Elevating trains on bridges and earthen berms especially in sensitive environments, creates special safety risks and concerns. The impacts of spills and derailments can be more severe on elevated tracks. The proposed freight rail re-location routes elevate tracks significantly and introduce freight rail tracks to areas that have not had tracks before. Measures to improve the safety and eliminate potential negative impacts associated with elevated tracks need to be included in the SWLRT project. They should include:

- a. Softening of side-slopes. The proposed side-slopes are far too steep at 2:1 grades; they should be at 3:1 or flatter for safety, and to maintain proper vegetation.
- b. Inner guard rail should be used. A special extra rail should be placed on tracks to reduce the potential severity of derailments.
- c. Widening the MN&S right-of-way width to a minimum 100 ft. or possibly more in some areas depending on the height of the tracks relative to adjacent property. The current right-of-way is 66 feet or less. This is inadequate especially for elevated tracks. A wider right-of-way must be provided to:
 - i. provide an appropriate area for buffering single-family homes and yards from trains,
 - ii. provide safe, maintainable side-slopes for the tracks elevated by earthen berms; and,
 - iii. allow adequate space to access the tracks for maintenance.

The homes along the west side of Blackstone Avenue between Minnetonka Blvd and 27th Street need to be acquired to create an adequate corridor for train operations and buffer nearby residents from trains. Similarly, four homes on Minnetonka Blvd; and, four homes near Lake Street, one home on Brunswick and three homes on Blackstone, also must be acquired to create adequate right-of-way. The locations of the homes that must be acquired are shown on the attached map.

- d. Align freight tracks in the right-of-way to provide adequate protection for residents and uses on both sides of the freight rail tracks. In general, this means locating the tracks in the middle of a 100 foot right-of-way, but in some cases more buffer area may be needed on one side or both sides of the freight rail tracks. An evaluation of the potential consequences of a train derailment may lead to the conclusion that more than a 50 foot buffer is needed between the center line of the tracks and the nearest property line on one or both sides of a portion of the tracks. Tracks elevated more than 13 feet above adjacent properties will require more than 100 feet of right-of-way to accommodate side-slopes and the freight tracks.
- e. Fencing and signage are needed to minimize railroad right-of-way trespassing.

- f. A derailment study must be done to assess the risks due to the proposed elevated tracks and identify any actions needed to mitigate these risks including potentially widening of the freight rail right-of-way. The cost of the study and any mitigation items identified in the study must be funded by the project.
2. Retaining walls on raised sections of MN&S can be an attractive nuisance and present a dangerous situation for kids; tall retaining walls should be avoided.
3. Both relocation options pass by or through the Xcel electric substation on Hwy 7. The relocation concept plans provide no indication as to what the impacts of trains in close proximity to the electric substation will be, or how any negative impacts will be avoided and/or mitigated. A thorough evaluation of the risks and how those risks will be mitigated must be provided, as well as how the mitigation will be funded must be provided to ensure the safety of the electric substation and the residents, businesses and visitors to St. Louis Park.

C. Property Impacts

1. The information provided by the SPO to date does not fully describe the number and type of properties and acreage and costs of acquisition needed for each alternative. This information must be provided in order to accurately compare alternatives.
2. The height of tracks in relation to surrounding uses must be shown.
3. The property impacts for each alternative (besides takings), i.e. people and operations impacted at the football field, Park Spanish Immersion School, Central Community Center, etc. must be considered and evaluated. These facilities are used by a broad spectrum of the community. Any degradation of the quality, functionality or accessibility of these community wide facilities must be considered as part of the evaluation of the freight rail routing options.
4. The relocation alternatives place elevated freight rail close to Central Community Center and Park Spanish Immersion Elementary school and the young children that use this facility. There are inherent risks with trains in close proximity to young children and there is nothing provided in the proposed re-route plans for how this risk will be addressed and how children will be protected. A plan for how to mitigate any negative impacts and safety risks must be prepared along with a plan for funding the mitigation and safety improvements.
5. It is not shown how the SLP High School football stadium would be replaced. It would not appear to fit north of the proposed relocated Lake Street especially if the power lines are not also relocated and additional properties are not acquired. The football stadium must be replaced. Finding a nearby location will be very difficult. Relocating the football stadium comes with many challenges that go beyond simply obtaining property. They include how to effectively address potential negative neighborhood impacts of noise, lights, and traffic. Selecting a new location for the football stadium will require an

extensive public process of its own that will be time consuming and expensive. This process needs to be funded and completed before a freight rail routing decision is made, if the Brunswick West re-routing alternative is to be seriously considered. The future location and funding for replacing the football stadium must be resolved by the SWLRT project.

6. How the playground serving the Central Community Center (Central) will be replaced and funded must be established before freight rail decisions are finalized. The playground is critical to the operation of the Central facility. Access from Central to the football stadium must be addressed through a pedestrian tunnel or other measure. The connection between these facilities is important for the operation of Central and the commitments made by the SLP School District in the funding of the turf field. Access must be maintained.
7. Freight rail relocation options show a large loss of commercial properties that house many businesses that would have to move but may not be able to be relocated in SLP. The potential loss of locally owned businesses is of particular concern. Every effort to retain locally owned businesses and the jobs they provide must be utilized.
8. The loss of tax base, jobs, and businesses must be minimized.
9. There are significant impacts on commercial/industrial businesses and properties which need to be addressed. In some cases, through streets are turned into cul de sacs or re-routed. In other cases, existing streets are eliminated or re-aligned. All of these changes have impacts on the accessibility and visibility of existing businesses. The plans to date are rudimentary at best and only begin to scratch the surface of identifying issues, much less resolving them. The consequences of the changes to the street system, elimination of existing commercial buildings and the future of the remnant parcels created within the proposed changes in the Lake Street/Wooddale/Walker/Library Lane area must be fully evaluated and mitigation actions identified. Access issues for businesses and uses at Dakota and Walker St. where a cul-de-sac is proposed must be addressed and solutions acceptable to the businesses involved created.
10. How freight trains and the trail will operate during construction must be clearly identified. The massive nature of a freight rail reroute project raises concerns about the constructability of the re-route options. The proposed routes cut through the center of the City of St. Louis Park. How the new rail route can be constructed while the current trains continue to operate is not apparent. A plan for how freight rail service will be maintained during construction and how any negative impacts on the community, its residents, businesses, schools, parks and property owners from the actions needed to maintain freight rail operations will be mitigated must be prepared and approved by St. Louis Park before a decision to re-route freight trains is made.
11. The construction of either of the freight rail re-route options will entail significant disruption to all aspects of the community; residents' daily lives, schools, parks and businesses will all be dramatically affected. Construction will entail hauling massive amounts of fill material through single-family neighborhoods, school campuses, parks

and commercial areas. Today more than 100 single-family homes abut the MN&S corridor. The construction project will literally be happening in their backyards. Local residential streets will be impacted by the heavy equipment traffic and no doubt periodic street closures during the construction process. Noise, vibration, dust, disruption of accessibility, congestion and safety issues are all likely consequences of the construction activity needed for a freight rail reroute. A detailed plan for how construction will be accomplished and how the impacts on the property owners, residents, schools and parks will be mitigated must be prepared and shared with the community before a freight rail routing decision entailing the re-routing options is made.

12. Construction will have major business interruption issues. How access will be maintained and how businesses will continue to operate successfully during construction must be identified and prescribed in a plan prior to consideration of re-routing freight rail traffic. All impacts on businesses need to be identified, addressed and mitigated.
13. Wooddale Avenue and Lake Street alignments and the location of new streets will need much more evaluation. The options shown need to be much more thoroughly considered in order for a road system in the area to work and a specific design established. Roadwork and reconfiguration of streets is necessary for the rerouting alternatives: SW LRT's cost estimates need to include the engineering, design and capital cost of this work. Extensive public involvement would be needed to plan and complete this work.
14. Who would own and maintain the new bridges and tracks is not determined and is an issue of importance to the City. If this new infrastructure is built in SLP it is of great importance that it be well maintained and that the lines of responsibility for it are clear.
15. The SWLRT plans all call for the removal of the freight rail storage tracks along the Bass Lake Spur in St. Louis Park. A commitment and agreement to the removal of the storage track must be in place prior to approval of the SWLRT plans.
16. A pedestrian connection at 27th Street West under the MN&S as discussed in the DEIS is not shown in the proposed re-route plans. This is a needed and important connection between the Birchwood and Bronx Park neighborhoods and as an access point for the neighborhood to Dakota Park, Hobart School and the Cedar Lake Regional Trail access point.
17. The 28th Street options should be evaluated to see if the roadway could be grade separated instead of an at-grade crossing. If it is an at-grade crossing it must include crossing controls needed for a Whistle Quiet Zone (WQZ).
18. A circulation study for the area north of Minnetonka Boulevard is needed to evaluate traffic impacts from street closures in the area. It must identify the appropriate improvements and funding that will be provided to mitigate impacts.
19. The re-route options reduce the viability of reuse of the currently unused portion of Nat'l Lead site; compensation for this loss is needed.

20. South of Bass Lake Spur, the MN&S tracks move east, potentially impacting adjacent residential property and reducing the setbacks to less than 25 ft.; these properties must be acquired.
21. The Cedar Lake Trail Bridge at the Iron Triangle wye is not shown on plans; this must be included on the plans and funded as part of the project.
22. The future of the CP right-of-way in the vicinity of the SLP High School needs to be addressed as the re-route options eliminate the freight rail tracks in this area. No further railroad use of this property must be allowed; the use and ownership of the property needs to be established. The first priority for the use of the property should be the SLP School District or some other public use such as a trail, followed by providing some opportunities for economic development. The potential reuse of the property will be hampered by the on-going presence of overhead power lines that currently follow the MN&S right-of-way.
23. More information on properties shown as "partial acquisition" must be provided to understand if they are usable and if they will have access to a public street or not. Some of these parcels may need to be full acquisitions.
24. The future of the land caught between the MN&S tracks and the wyes connecting the Bass Lake Spur to the MN&S tracks south of Hwy 7 is not explained in the proposed relocation plans. Who will own and maintain these properties and how will they be used must be known in order to evaluate the relocation options.

D. Environmental Impacts

1. Environmental impacts including noise, vibration, safety, wetlands, woodlands, traffic/road systems and all other standard environmental review items must be evaluated. No information on the potential environmental impacts has been provided. This is a critical component in the evaluation of the freight rail options and the design of the project, and must include mitigation measures. It is anticipated that the increased elevation of the tracks and trains will increase the potential for noise impacts on the surrounding neighborhoods. No indication has been provided for how these impacts will be addressed. Mitigation measures must be identified and funding for those measures included in the SWLRT project.
2. The football stadium, Central Community Center playgrounds, Roxbury/Keystone Park, Dakota Park, Birchwood Park and other properties present potential 4f parcel impacts; these must be evaluated, addressed and mitigated.
3. Several potentially historic homes and buildings may be taken and this situation needs to be evaluated. 106 reviews may be required for older buildings now potentially impacted by new re-location routes.

4. The loss of a major swath of trees and vegetation along Iron Triangle eliminates the existing screening of trains and tracks to the residents; this needs to be addressed and landscaping must be replaced.
5. The Brunswick Pond was constructed for flood mitigation and cannot be filled in without replacement in the immediate area to address area flooding issues. How and where this storm water storage is replaced is a critical issue. It must be resolved along with identifying funding of mitigation of any negative impacts created from the relocation of the storm water pond before a freight rail decision is made.
6. The Iron Triangle wye to BNSF moves west into wetland; wetland impacts need to be evaluated and mitigation plans prepared before the freight rail routing decision is made.
7. Stormwater drainage for a new rail route must be carefully studied and evaluated. There is no indication as to where or how the storm water from the freight rail infrastructure would be handled. How this ponding is to be provided and where it will be located must be resolved before a re-routing decision is made. Likewise any negative impacts from the ponding plan and needed mitigation must be identified and funding established. These plans must be approved by the City of St. Louis Park.
8. A new storm water plan for the larger area must be created at the expense of the SWLRT project because the reroute options will alter the overall storm water drainage system and change the direction of surface water drainage for a large portion of the community.
9. The Brunswick Central re-routing alternative entails lowering Hwy 7 by 4.5 feet. This will have an impact on the City's storm water system and that has not been evaluated. Any new infrastructure needed in St. Louis Park as a result of the lowering of Hwy 7 must be included in the SWLRT project.
10. Construction of a new two mile siding along BNSF tracks will result in additional noise and vibration to surrounding properties; these must be addressed and mitigated.
11. Full topographic information from surveys must be completed prior to any decision to re-route freight trains to the MN&S routes to ensure freight trains can operate on the re-location routes as anticipated, and to ensure the heights of bridges, berms and tracks shown in the current proposals are accurate.
12. Computer analysis of operating freight trains on the re-location routes must be completed prior to any decision to re-relocate freight trains to the proposed routes to ensure that trains can operate at the proposed speed of 25 mph. Any change in the operating speeds will change the potential freight train impacts including traffic, noise and vibrations impacts, in turn potentially changing the mitigation measures needed for the project.
13. The location of underground utilities near the proposed heavy earth berms need to be identified and the potential impacts of those berms on underground utilities evaluated. Mitigation must be provided to protect or relocate the underground utilities at the SWLRT's cost.

From: [Meg McMonigal](#)
To: [Jacobson, Nani](#)
Subject: SDEIS
Date: Monday, August 12, 2013 4:01:42 PM
Attachments: [SDEIS letter and comments.pdf](#)

Letter and comments attached.

Thanks

Meg

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

August 12, 2013

Ms. Nani Jacobson
Project Manager
Southwest LRT Project Office
Park Place West, 6465 Wayzata Boulevard, Suite 500
St. Louis Park, MN 55426

Dear Nani,

This letter is in response to the July 22, 2013 Notice of Intent to prepare a Supplemental Draft Environmental Impact Statement (SDEIS) for the Southwest Light Rail Transit Extension Project.

The City of St. Louis Park submits the attached list of “Key Issues and Comments on Freight Rail Alternatives” that was originally submitted to Mark Fuhrmann on July 9, 2013. This document specifies the issues that are of primary importance to St. Louis Park, especially related to the impacts of the new freight rail routing alternatives. The City of St. Louis Park requests that these issues and impacts, as well mitigation measures for each alternative route be addressed in the SDEIS.

In addition we request all of the standard and required Environmental Assessment Worksheet and Environmental Assessment Impact items and topics be addressed for to the new alignment options.

Thank you for this opportunity to comment.

Sincerely,



Tom Harmening
City Manager

City of St. Louis Park

Key Issues and Comments on Freight Rail Alternatives July 8, 2013

The City of St. Louis Park has reviewed the eight (8) alternative freight rail routing alignments and provides the following comments and requests for further information for evaluating the alternatives. *It is important to note that any comment, question or suggestion relating to the Re-Location Alternatives should not in any way be construed that the City supports the re-location options.*

Key Issues to address for freight rail routing to be successful:

Co-location Alternatives

1. Presence of freight rail and trains potentially interferes with access to LRT station platforms by foot, bike, bus and auto. Significant traffic impacts will occur at Wooddale Avenue and Beltline Boulevard; these impacts must be assessed and addressed. A circulation study for the areas around the stations is needed to evaluate and mitigate traffic impacts in the area.
2. Grade separation of freight rail at Wooddale Avenue is not practical; however grade separating LRT and the Cedar Lake Regional Trail is feasible and would reduce traffic conflicts. The search for ways to eliminate the negative traffic and access impacts from freight rail and LRT crossing Wooddale Avenue needs to continue. This is a vital north-south route for the community and the Elmwood and Sorensen neighborhoods specifically, and long delays due to LRT and freight trains are not acceptable or safe. Alternative grade separated vehicular crossings or routes under or over the rail/trail corridor are needed at either Yosemite or Xenwood Avenues.
3. Beltline Boulevard must be grade separated from LRT, freight rail and the regional trail by putting Beltline with sidewalks below the rail/trail corridor. Beltline is the only north-south crossing of the rail/trail corridor between the W. Lake Street Bridge and Highway 100. It is critical for circulation in the community and emergency vehicles that traffic movements not be unduly delayed by the presence of freight trains or LRT. Only grade separation will ensure that no matter when freight trains and LRT trains arrive, or whether they are on schedule or not, traffic and emergency vehicles will be able to move where they need to go. The accumulative effects of at grade crossings at both Wooddale and Beltline are particularly troubling, since a train that creates traffic problems at one street crossing will move on to create crossing problems at the next street; and in some cases a single train will be long enough to block both intersections at once. Grade separation at Beltline would mean traffic could at least continue to flow there, and if the Wooddale crossing is blocked, traffic could divert to either Beltline on the east or Louisiana Avenue on the west if needed.

4. Presence of freight rail and LRT at station areas affects development opportunities; design must consider development-friendly configurations.
5. Emergency vehicle delays will occur when freight trains are present at Wooddale Avenue and Beltline Boulevard. Grade separation or other means of maintaining emergency vehicle accessibility in the community must be provided.
6. The Midtown trolley station/platform may be located at the West Lake Station and requires additional property takings; these costs must not be attributed to the SWLRT project.

Re-Location Alternatives

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20. South of Bass Lake Spur, the MN&S tracks move east, potentially impacting adjacent residential property and reducing the setbacks to less than 25 ft.; these properties must be acquired.
21. The Cedar Lake Trail Bridge at the Iron Triangle wye is not shown on plans; this must be included on the plans and funded as part of the project.
22. The future of the CP right-of-way in the vicinity of the SLP High School needs to be addressed as the re-route options eliminate the freight rail tracks in this area. No further railroad use of this property must be allowed; the use and ownership of the property needs to be established. The first priority for the use of the property should be the SLP School District or some other public use such as a trail, followed by providing some opportunities for economic development. The potential reuse of the property will be hampered by the on-going presence of overhead power lines that currently follow the MN&S right-of-way.
23. More information on properties shown as “partial acquisition” must be provided to understand if they are usable and if they will have access to a public street or not. Some of these parcels may need to be full acquisitions.
24. The future of the land caught between the MN&S tracks and the wyes connecting the Bass Lake Spur to the MN&S tracks south of Hwy 7 is not explained in the proposed relocation plans. Who will own and maintain these properties and how will they be used must be known in order to evaluate the relocation options.

D. Environmental Impacts

1. Environmental impacts including noise, vibration, safety, wetlands, woodlands, traffic/road systems and all other standard environmental review items must be evaluated. No information on the potential environmental impacts has been provided. This is a critical component in the evaluation of the freight rail options and the design of the project, and must include mitigation measures. It is anticipated that the increased elevation of the tracks and trains will increase the potential for noise impacts on the surrounding neighborhoods. No indication has been provided for how these impacts will be addressed. Mitigation measures must be identified and funding for those measures included in the SWLRT project.
2. The football stadium, Central Community Center playgrounds, Roxbury/Keystone Park, Dakota Park, Birchwood Park and other properties present potential 4f parcel impacts; these must be evaluated, addressed and mitigated.
3. Several potentially historic homes and buildings may be taken and this situation needs to be evaluated. 106 reviews may be required for older buildings now potentially impacted by new re-location routes.

4. The loss of a major swath of trees and vegetation along Iron Triangle eliminates the existing screening of trains and tracks to the residents; this needs to be addressed and landscaping must be replaced.
5. The Brunswick Pond was constructed for flood mitigation and cannot be filled in without replacement in the immediate area to address area flooding issues. How and where this storm water storage is replaced is a critical issue. It must be resolved along with identifying funding of mitigation of any negative impacts created from the relocation of the storm water pond before a freight rail decision is made.
6. The Iron Triangle wye to BNSF moves west into wetland; wetland impacts need to be evaluated and mitigation plans prepared before the freight rail routing decision is made.
7. Stormwater drainage for a new rail route must be carefully studied and evaluated. There is no indication as to where or how the storm water from the freight rail infrastructure would be handled. How this ponding is to be provided and where it will be located must be resolved before a re-routing decision is made. Likewise any negative impacts from the ponding plan and needed mitigation must be identified and funding established. These plans must be approved by the City of St. Louis Park.
8. A new storm water plan for the larger area must be created at the expense of the SWLRT project because the reroute options will alter the overall storm water drainage system and change the direction of surface water drainage for a large portion of the community.
9. The Brunswick Central re-routing alternative entails lowering Hwy 7 by 4.5 feet. This will have an impact on the City's storm water system and that has not been evaluated. Any new infrastructure needed in St. Louis Park as a result of the lowering of Hwy 7 must be included in the SWLRT project.
10. Construction of a new two mile siding along BNSF tracks will result in additional noise and vibration to surrounding properties; these must be addressed and mitigated.
11. Full topographic information from surveys must be completed prior to any decision to re-route freight trains to the MN&S routes to ensure freight trains can operate on the re-location routes as anticipated, and to ensure the heights of bridges, berms and tracks shown in the current proposals are accurate.
12. Computer analysis of operating freight trains on the re-location routes must be completed prior to any decision to re-relocate freight trains to the proposed routes to ensure that trains can operate at the proposed speed of 25 mph. Any change in the operating speeds will change the potential freight train impacts including traffic, noise and vibrations impacts, in turn potentially changing the mitigation measures needed for the project.
13. The location of underground utilities near the proposed heavy earth berms need to be identified and the potential impacts of those berms on underground utilities evaluated. Mitigation must be provided to protect or relocate the underground utilities at the SWLRT's cost.